CROSSINGS CAMPUS

Draft Environmental Impact Report
State Clearinghouse No. 2021110079

Prepared for
City of Culver City
Culver City Case Nos:
P2022-0144 CP/ZCMA
P2021-0272-EIR

July 2022

ESA

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EXECUTIVE SUMMARY

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code Sections 21000 et. seq.) in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

ES.1 Project Description

Culver Crossings Properties LLC, the Applicant, proposes to develop the Crossings Campus Project (Project) (formerly known as Project Crossings), an office project on an approximately 4.46-acre (194,334-square-foot [sf]) site consists 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 8833 and 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 Culver City Parcel is located to the east of the Downtown District of Culver City and in the Washington National Transit Oriented Development District. 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 two freeways; the Santa Monica Freeway (I-10) located approximately 630 feet north of the Project Site and the San Diego Freeway (I-405), located approximately 2.09 miles west of the Project Site. The Project Site is also served by the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and multiple Metro and local bus lines that provide service along Venice, National, and Washington Boulevards.

The Project Site is currently improved with single single-story 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, street edge, and building perimeter planting.

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 an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. 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.

The Project would involve demolition of the three existing buildings on the Project Site, totaling 105,047 sf, to support the proposed 536,000 sf 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 two 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 478 vehicular parking spaces and 51 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.[1] 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, a 7,120-sf publicly accessible, privately maintained amenity area along Washington Boulevard, as well as 51,600-sf internal courtyard for the use of employees and occasional private tenant events.

[1] The estimated occupant projections are based on the tenant's operational space planning for office buildings and similar existing facilities operated by the tenant.

ES.2 Issues Raised during Notice of Preparation Process

The following summarizes the key potential environmental issues raised in response to the NOP and during the public scoping meeting (the reference in parenthesis is the EIR chapter/section in which the analysis is provided). The comments on the Initial Study as part of the NOP process are contained in Appendix A of this Draft EIR.

- Concern that there is not enough open space for community use (Refer to Chapter 2, *Project Description,* of this Draft EIR.)
- Concern that the Project would generate shade and shadow on the neighboring roof-mounted photovoltaic solar array (Refer to Section 4.1, *Aesthetics,* of this Draft EIR.)
- Concern about the Project's sustainability claims (Refer to Section 4.6, *Greenhouse Gas Emissions,* of this Draft EIR.)
- Concern that the Project is inconsistent with the Culver City Transit Oriented Development Visioning Plan (Refer to Section 4.9, *Land Use and Planning,* of this Draft EIR.)
- Concern about the Project's compliance with the City's Bicycle and Pedestrian Action Plan (Refer to Section 4.9, *Land Use and Planning,* of this Draft EIR.)
- Concern about Project construction vibration damage to neighboring buildings (Refer to Section 4.10, *Noise,* of this Draft EIR.)
- Concern about Project construction noise impacts to neighboring buildings (Refer to Section 4.10, *Noise,* of this Draft EIR.)
- Concern that the Project would add significant levels of new vehicular trips that would worsen traffic in the Project Area (Refer to Section 4.12, *Transportation,* of this Draft EIR.)
- Concern about several large-scale related projects in the Project Area that would also contribute to increased traffic (Refer to Section 4.12, *Transportation,* of this Draft EIR.)
- Concern about the Project's driveway configurations being unsafe (Refer to Section 4.12, *Transportation,* of this EIR.)
- Concern that the Project includes too much vehicle parking and does not account for the proximity to the Metro station (Refer to Section 4.12, *Transportation,* of this EIR.)
- Concern that housing should be included on the Project Site (Refer to Chapter 5, Alternatives, and Chapter 6, *Other CEQA Considerations,* of this EIR.)

ES-3 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.2, *Air Quality*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative air quality impacts during construction of the Project and as evaluated in Section 4.10,

Noise, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative on-site construction noise, cumulative off-site construction noise (construction vehicles), and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles) impacts.

Construction Air Quality - Regional NO_X Emissions (Project-Level and Cumulative): As analyzed in Section 4.2, *Air Quality*, of this Draft EIR, during 2025, there will be a period of time when Building 1 is operational and Building 2 is still under construction. The Project's overlapping construction and emissions of NO_X in 2025 would exceed the SCAQMD thresholds of significance. Emissions of other criteria pollutants would be below SCAQMD thresholds. The NO_X emissions result primarily from heavy-duty trucks during overlapping construction of Building 2 while Building 1 is operational. Therefore, the Project's temporary impact related to overlapping construction and operational regional NO_X emissions would be potentially significant. Mitigation Measure AQ-MM-1 would be required to reduce overlapping construction-related NO_X emissions that would be concurrent with the Building 1 regional operational emissions. In addition, there are no feasible mitigation measures to reduce construction emissions further or reduce operational emissions of NO_X. With implementation of feasible mitigation, regional NO_X emissions from overlapping construction and operations would remain above the regional operational significance threshold for NO_X. The use of SCAQMD's operational significance threshold for NO_X provides a conservative analysis of potential regional NO_X emissions impacts as it is lower than the construction significance threshold for NO_X. Therefore, based on this conservative methodology, short-term and temporary impacts related to regional NO_X emissions occurring during this overlapping operational and construction phase would be significant and unavoidable after implementation of feasible mitigation measures. There would also be a cumulatively considerable net increase of NO_X emissions, which would result in a significant and unavoidable cumulative impact.

On-Site Construction Equipment Noise (Project-level and Cumulative): Off-site receptor locations at R1, R2, and R3 have more than two-story buildings represented, and upper floor receivers/units that have outdoor living areas on the side facing the Project construction areas would be exposed to construction noise from the Project Site. Mitigation Measure NOI-MM-1 would provide at least a 10 dBA noise reduction at ground-floor sensitive receptors R1 and R2, and 5 dBA noise reduction at sensitive receptors R3 and R4. Mitigation Measure NOI-MM-2 requires that muffler systems provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system. With implementation of mitigation measures maximum construction noise levels would not increase ambient noise levels at any of the ground-floor noise-sensitive receptor locations above the applicable thresholds of significance. With standard building exterior-to-interior noise attenuation provided by modern building construction, interior noise levels at these off-site receivers would not result in significant impacts. However, with respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units, due to technical limitations including barrier foundation needs and wind load capacities. Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor

residential units at receptor locations R1, R2, and R3 to the west of the Project Site, construction noise would remain significant and unavoidable.

Cumulative construction noise impacts associated with on-site construction equipment could be significant in the event that construction activities as part of Related Project Nos. 5, 8, 9, 11, 14, and 15 occur within 1,000 feet of the Project Site. Each of these related projects are required to comply with the noise standards and ordinances of the City of Culver City and City of Los Angeles, as applicable. Exact construction schedules for these related projects are not known. It is not possible to predict whether construction of these related projects would overlap with construction of the Project. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as the Project. Because the Project would result in potentially significant construction noise impacts prior to mitigation measures, cumulative on-site noise from the Project and related projects could result in potentially significant cumulative construction noise impacts at similar off-site receptors and receivers between the Project Site and the nearest related project sites. Mitigation Measures NOI-MM-1 and NOI-MM-2 would serve to reduce cumulative on-site construction noise impacts. With respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units at receptor locations R1, R2 and R3, due to technical limitations including barrier foundation needs and wind load capacities.

Off-Site Construction Noise – Mobile Sources (Cumulative): With regard to off-site construction noise, construction traffic from related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. Given that it is possible that the Project and related projects could together contribute to cumulative off-site construction traffic noise levels on the same roadways at the same time and could exceed a significance threshold with combined cumulative traffic levels, cumulative off-site construction traffic noise impacts would be potentially significant. The installation of sound barriers would be inappropriate for residential land uses that face the roadway as it would be impractical and create aesthetic and access concerns. Thus, there are no feasible mitigation measures that could be implemented to reduce the temporary cumulative off-site construction traffic noise impacts. Therefore, the Project's contribution to cumulative off-site construction noise would be cumulatively considerable and would represent a significant and unavoidable impact.

Off-Site Construction Vibration – Human Annoyance (Project-level and Cumulative): It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential, hotel and theater uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 25 feet of the sensitive use (residential and hotel use) along Venice Boulevard, Washington Boulevard, S. Robertson Boulevard, and National Boulevard. Temporary vibration levels could reach approximately 72 VdB periodically as

heavy-duty construction trucks, including haul trucks and concrete trucks, pass sensitive receptors along the anticipated haul route(s). Therefore, the residential uses along National Boulevard, Washington Boulevard, S. Robertson Boulevard, and Venice Boulevard (between the Project Site and I-10), would be exposed to ground-borne vibration up to 72 VdB, which would be at the 72-VdB significance criteria from the heavy-duty construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. However, traffic travelling on public roadways, including haul trucks on the haul routes, is beyond the control of the Project. In addition, Project-related heavy-duty construction trucks would be restricted to the designated haul routes (Venice Boulevard, Washington Boulevard, National Boulevard, and La Cienega Boulevard) and avoid other neighborhood streets, so that this potential impact is minimized. Potential vibration impacts associated with heavy-duty construction trucks traveling on public roadways would remain significant and unavoidable.

Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. Construction of the Project, both on-site and off-site, would not result in significant vibration impacts related to structural damage. However, the Project would result in vibration impacts related to human annoyance. As such, should construction traffic of the Project and related projects overlap, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. Therefore, cumulative off-site construction vibration impacts would be potentially significant. However, no feasible mitigation measures are available for off-site construction truck route vibration impacts. Thus, the Project's contribution to cumulative off-site construction vibration would be cumulatively considerable and would represent a significant and unavoidable impact.

ES.4 Alternatives that Would Reduce or Avoid Significant Impacts

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

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, Alternative 1 means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. As mentioned in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently improved with single-story warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. On the Culver City Parcel, the approximately 9,739-sf building is currently used for storage and the 9,082-sf building is currently vacant. On the Los Angeles Parcel, the approximately 86,226-sf warehouse building has been partitioned into six separate spaces

consisting of 51,500 sf of office and 34,726 sf of retail. Under this alternative, the occupied areas on the Project Site would continue to operate as under existing conditions. In addition, as it can be reasonably assumed that the vacant 9,082-sf building could be occupied in the future, under this alternative this building is assumed to be re-occupied by office uses, which was the use of the building prior to becoming vacant. The 9,739-sf building on the Culver City Parcel would continue to be occupied by storage uses.

ES.4.2 Alternative 2: Zoning-Compliant Alternative

With development under the Zoning-Compliant Alternative (Alternative 2), the Project Site would be developed in accordance with the existing Industrial General (IG) and East Washington Overlay (-EW) Zone on the Culver City Parcel and C2-2D-CPIO (Commercial, Height District 2, Community Plan Implementation Overlay) zone, CPIO, and Expo TNP on the Los Angeles Parcel. The IG and -EW Zone both allow for office uses, including creative office and multimedia production. 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 "D" Development Limitation that requires compliance with the West Adams–Baldwin Hills–Leimert CPIO, which includes regulations on permitted uses, floor area, height, setbacks, parking, and landscape. Similar to the Project, this alternative would include creative office uses.

Alternative 2 would develop a total of 491,842 sf of office uses on the Project Site compared to the Project's proposed 536,000 sf of office uses, for an 8 percent reduction in total building sf. To comply with the 43-foot height limit of the existing zoning, Building 1 on the Culver City Parcel would feature a three-story building instead of the four-story building contemplated under the Project. The reduced building would include 122,842 sf of office, 44,158 sf less than the 167,000sf in Building 1 under the Project. Other than the reduced height and square footage, the setbacks and general massing of Building 1 would remain the same under Alternative 2. Building 2 on the Los Angeles Parcel would feature the same total building area, number of stories, and maximum height as under the Project: 369,000 sf of office, configured in a five-story building, with a maximum building height of 75 feet. Alternative 2 would include a similar publicly accessible amenity area as the Project. However, the massing of Building 2 would be materially different than under the Project to strictly comply with the existing zoning. Unlike the Venice Boulevard frontage under the Project, which features an uninterrupted façade with a deeply recessed entryway, the Venice Boulevard frontage in Alternative 2 would be set back a maximum of two feet from the property line, and the street-facing façade would feature a 20-foot passageway effectively dividing Building 2 into two separate buildings, each with approximately 240 feet of frontage on Venice Boulevard. The Venice Boulevard frontage would also be built to a maximum height of 55 feet, rather than the 56 feet proposed in the Project. The National Boulevard frontage of Building 2 would observe a 15-foot dedication. The Venice Boulevard and National Boulevard building facades would be massed vertically from these setbacks, unlike the varied massing proposed under the Project. Levels three and four would be massed to observe the 5-foot step back from the Helms Building that applies above 30 feet. To recapture the lost building area resulting from the 20-foot passageway along Venice Boulevard, each level of Building 2 would increase in overall depth toward the central courtyard. However, Building 2 would provide the required open space under the CPIO. To be

consistent with the tower massing requirements under the CPIO, the fifth level would be reduced to a significantly smaller floorplate and would be located toward the center of the Los Angeles parcel, away from Venice Boulevard. Finally, to comply with the mid-block Paseo requirements of the Expo TNP, a publicly accessible pedestrian connection would be provided along portion of Building 2 adjacent to the Helms alley.

While the number of vehicle parking spaces provided would be reduced from 1,216 spaces under the Project to 1,095 spaces under Alternative 2, this alternative would still require a three-level subterranean garage under both the Building 1 and Building 2 and would require a maximum excavation depth of 50 feet, similar to the Project. However, the footprint of the subterranean parking garages would be reduced, which would in turn would reduce the amount of required soil excavation. Proposed circulation and loading dock locations would be similar under the Project and Alternative 2.

As with the Project, Alternative 2 would require the demolition of the existing buildings and associated paved surface parking areas on the Project Site. Although only an 8 percent reduction in sf is proposed under Alternative 2, given the reduced density and sf, the overall duration and intensity of construction under Alternative 2 would be incrementally less than that of the Project.

ES.4.3 Alternative 3: Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 3), the Project would see a 25 percent reduction in density and sf. With this reduction, Alternative 3 would include a total of 402,000 sf of creative office uses compared to the Project's proposed 536,000 sf of creative office uses. Specifically, Building 1 on the Culver City Parcel would include 125,250 sf, a reduction of 41,750 sf as compared to 167,000 sf in Building 1 under the Project. Building 2 on the Los Angeles Parcel would include 276,750 sf, a reduction of 92,250 sf as compared to 369,000 sf in Building 2 under the Project. The height of Building 1 would remain unchanged under Alternative 3 and would reach a maximum of 56 feet, although the fourth level of Building 1 would be significantly reduced as compared to the Project. As Building 2 would consist of four stories instead of five stories as under the Project, the height of Building 2 would be reduced to a maximum of 56 feet, from the maximum of 75 feet proposed under the Project. Alternative 3 would include a similar publicly accessible amenity area as the Project.

While the number of vehicle parking spaces provided by Alternative 3 would be reduced from 1,216 spaces under the Project to 911 spaces under Alternative 3, this alternative would still require a three-level subterranean garages under both Building 1 and Building 2 and would require a maximum excavation depth of 50 feet. However, the footprint of the subterranean parking garages would be reduced, which would in turn reduce the amount of required soil excavation. Proposed circulation and loading dock locations would be similar under the Project and Alternative 3.

As with the Project, Alternative 3 would require the demolition of the existing buildings and associated paved surface parking areas on the Project Site. Given the reduced density and sf, the overall duration and intensity of construction under Alternative 3 would be less than that of the Project.

ES.4.4 Alternative 4: Alternate Project Access Alternative

Under the Alternate Project Access Alternative (Alternative 4), the design, use programming and configurations of Buildings 1 and 2 proposed under the Project would remain the same. However, the difference in Alternative 4 compared to the Project is the addition of a traffic signal at the intersection of Venice Boulevard and the proposed driveway along Venice Boulevard, located at the eastern edge the northern Project Site boundary, and the removal of office-related vehicular access on Washington Boulevard (the Washington Boulevard driveway would continue to serve as emergency access). As the required demolition, building sf, heights, land use uses, amenity areas, and proposed subterranean parking would be the same under Alternative 4 and the Project, it is assumed that the overall duration and intensity of construction under Alternative 4 would be similar to that of the Project.

Given that the on-site Project characteristics would be essentially the same under both Alternative 4 and the Project, it can be concluded that impacts related to aesthetics, air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, tribal cultural resources, and utilities and service systems would be similar to those of the Project and no further analysis is required. The proposed signal along Venice Boulevard would not materially impact the analysis and conclusions of these issue areas. However, the proposed signal would affect trip distribution and intersection volumes, which may impact noise and transportation impacts.

ES.4.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "No Project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes (1) the No Project/No Build Alternative, (2) Zoning-Compliant Alternative, (3) the Reduced Project Alternative, and (4) the Alternate Project Access Alternative. A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in Table 5-2, *Comparison of the Impacts of the Project and Alternatives*, in Chapter 5, *Alternatives*, of the Draft EIR. In addition, Table 5-3, *Ability of Alternatives to Meet Project Objectives*, is also provided in Chapter 5, *Alternatives*, of the Draft EIR to show a comparison of the ability of the analyzed alternatives to meet Project Objectives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions, with the exception of the vacant areas on the Project Site, which are assumed to continue to be vacant. Alternative 1 would not meet most of the Project Objectives, would only partially meet three of the Project Objectives, and would avoid all of the Project's potentially significant impacts and would have reduced impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 2, the Zoning-Compliant Alternative, and Alternative 3, the Reduced Project Alternative, would both involve less development compared to the Project, and both alternatives would reduce, but not eliminate, the Project's significant unavoidable impacts related to Project-level and cumulative regional air quality emissions, Project-level and cumulative on-site construction noise, cumulative off-site construction noise (construction vehicles), and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles) impacts. In addition, Alternative 4, Alternate Project Access, proposes a similar development as the Project and, as such, would results in similar significant and unavoidable impacts. However, Alternative 3 is considered the environmentally superior alternative, as it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 2 as it would require less building construction and shortened building height for Building 2.

However, because Alternative 3 would develop a smaller office development, the number of employees would be reduced. As such, Alternative 3 would meet to a lesser extent than the Project the Project Objectives related to increasing employee density in proximity to transit; providing a high-quality office space to attract and retain desirable innovative companies; strengthening the area's economic vitality by attracting and retaining highly skilled workers; and increased sales taxes from increased economic activity from the additional jobs.

ES.5 Summary of Environmental Impacts

This section summarizes the environmental impacts of the Project as evaluated in Chapter 4, *Environmental Impacts Analysis*, of the Draft EIR. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*. Following Table ES-1, the Project's proposed project design features and required mitigation measures are listed.

As shown in Table ES-1, based on analyses contained in this Draft EIR, the Project would result in significant and unavoidable Project-level and cumulative regional NOx emissions impacts, Project-level and cumulative on-site construction noise impacts, cumulative off-site construction noise impacts, and Project-level and cumulative off-site vibration impacts related to human annoyance during construction. The implementation of PDFs and/or feasible mitigation measures would not reduce these effects to a less than significant level. As such, impacts associated with regional NOx emissions, on-site construction noise, off-site construction noise, and off-site vibration related to human annoyance would remain significant and unavoidable.

Other issues evaluated in the Draft EIR, in which impacts were determined to be less than significant with or without mitigation, include aesthetics, consistency with applicable air quality plans, operational criteria air pollutants, air pollutant concentration exposure, odors, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, construction noise, construction and operational vibration, public services (fire and police), transportation, tribal cultural resources, and utilities and service systems.

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.1 Aesthetics			
SCENIC VISTAS	See Project Design Feature AES-PDF-1 (Construction Fencing), below.	None required	No Impact
SCENIC RESOURCES	Not applicable	None required	No Impact
REGULATIONS GOVERNING SCENIC QUALITY	See Project Design Feature AES-PDF-2 (Screening of Utilities), below.	None required	No Impact
LIGHT AND GLARE	See Project Design Features AES-PDF-1 (Construction Fencing), AES-PDF-3 (Glare), and AES-PDF-4 (Lighting), below.	None required	No Impact
4.2 Air Quality			
CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN			
Construction	Not applicable	None required	Less Than Significant
Operation	See Project Design Feature TRAF-PDF-2 (Transportation Demand Management (TDM) Program), below.	None required	Less Than Significant
CUMULATIVELY CONSIDERABLE INCREASE OF CRITERIA POLLUTANTS IN NONATTAINMENT AREA			
Project – Construction	Not applicable	See Mitigation Measure AQ-MM-1 (Construction Equipment Features), below.	Significant and Unavoidable
Cumulative – Construction	Not applicable	See Mitigation Measure AQ-MM-1 (Construction Equipment Features), below.	Significant and Unavoidable
Operation	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS			
Construction	Not applicable	None required	Less Than Significant
Operation	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.3 Cultural Resources			
HISTORICAL RESOURCES	Not applicable	None required	Less Than Significant
ARCHAEOLOGICAL RESOURCES	Not applicable	See Mitigation Measures CUL-MM-1 through CUL-MM-3 and TCR-MM-1 through TCR-MM-3, below.	Less Than Significant with Mitigation
4.4 Energy			
WASTEFUL, INEFFICIENT, AND UNNECESSARY CONSUMPTION OF ENERGY RESOURCES			
Construction	Not applicable	None required	Less Than Significant
Operation	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
CONFLICT OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY			
Construction	Not applicable	None required	Less Than Significant
Operation	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
4.5 Geology and Soils			
FAULT RUPTURE	Not applicable	None required	Less Than Significant
STRONG SEISMIC GROUND SHAKING	Not applicable	None required	Less Than Significant
SEISMIC-RELATED GROUND FAILURE	Not applicable	None required	Less Than Significant
SOIL EROSION OR LOSS OF TOPSOIL	Not applicable	None required	Less Than Significant
UNSTABLE GEOLOGIC UNIT OR SOILS	Not applicable	None required	Less Than Significant
EXPANSIVE SOILS	Not applicable	None required	Less Than Significant
PALEONTOLOGICAL RESOURCES			
Construction	Not applicable	See Mitigation Measures GEO-MM-1 through GEO-MM-3, below.	Less Than Significant with Mitigation
Operation	Not applicable	None required	No Impact

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.6 Greenhouse Gas Emissions			
GREENHOUSE GAS EMISSISONS	See Project Design Features GHG-PDF-1 (Green Building Features), WATER-PDF-1 (Water Conservation), and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
CONFLICT WITH ANY APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS	See Project Design Features GHG-PDF-1 (Green Building Features), WATER-PDF-1 (Water Conservation), and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
4.7 Hazards and Hazardous Materials			
SIGNIFICANT HAZARD THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	Not applicable	See Mitigation Measures HAZ-MM-1 (Health and Safety Plan) and HAZ-MM-2 (Soil and Groundwater Management Plan), below.	Less Than Significant with Mitigation
SIGNIFICANT HAZARD THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS	Not applicable	See Mitigation Measures HAZ-MM-1 (Health and Safety Plan) and HAZ-MM-2 (Soil and Groundwater Management Plan), below.	Less Than Significant with Mitigation
HAZARDOUS CONDITIONS WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
HAZARDOUS MATERIALS SITES	Not applicable	None required	Less Than Significant
ADOPTED EMERGENCY RESPONSE PLAN	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
4.8 Hydrology and Water Quality			
CONSISTENCY WITH WATER QUALITY STANDARDS AND WASTE DISCHARGE REQUIREMENTS			
Construction	Not applicable	See Mitigation Measure HAZ-MM-2 (Soil and Groundwater Management Plan), below.	Less Than Significant with Mitigation
Operation	Not applicable	None required	Less Than Significant
GROUNDWATER SUPPLIES AND RECHARGE	Not applicable	None required	Less Than Significant
ALTERATION OF DRAINAGE PATTERNS, EROSION, EXCEEDANCE OF STORMWATER DRAINAGE SYSTEM, OR IMPEDED FLOOD FLOWS	Not applicable	None required	Less Than Significant

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN	Not applicable	None required	Less Than Significant
RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED STORMWATER DRAINAGE FACILITIES	Not applicable	None required	Less Than Significant
4.9 Land Use and Planning			
SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT	See Project Design Features GHG-PDF-1 (Green Building Features and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
4.10 Noise			
SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS			
Project – On-Site Construction	See Project Design Features NOI-PDF-1 (Project Construction Schedule), NOI-PDF-2 (Use of Impact Pile Driver), and NOI-PDF-3 (Construction Rules Sign), below.	See Mitigation Measures NOI-MM-1 and NOI-MM-2, below.	Significant and Unavoidable
Project – Off-Site Construction	NOI-PDF-5 (Neighborhoods Streets), below.	None required	Less Than Significant
Cumulative – On-Site Construction	See Project Design Features NOI-PDF-1 (Project Construction Schedule), NOI-PDF-2 (Use of Impact Pile Driver), and NOI-PDF-3 (Construction Rules Sign), below.	See Mitigation Measures NOI-MM-1 and NOI-MM-2, below.	Significant and Unavoidable
Cumulative – Off-Site Construction	NOI-PDF-5 (Neighborhoods Streets), below.	No feasible or practical mitigation measures are available	Significant and Unavoidable
Operation	See Project Design Features NOI-PDF-4 (Compliance with Noise Element), NOI-PDF-6 (Mechanical Equipment Noise), and NOI-PDF-7 (Loading Dock Operating Hours), and NOI-PDF-8 (Noise Control – Amplified Sound Systems), below.	None required	Less Than Significant
GROUNDBORNE VIBRATION AND GROUNDBORNE NOISE			
Project – Construction (Structural)	Not applicable	None required	Less Than Significant

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
Project – Construction (Human Annoyance)	Not applicable	No feasible or practical mitigation measures are available	Significant and Unavoidable
Cumulative – Construction (Human Annoyance)	Not applicable	No feasible or practical mitigation measures are available	Significant and Unavoidable
Operation	Not applicable	None required	Less Than Significant
4.11.1 Public Services – Fire Protection			
FIRE PROTECTION			
Construction	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
Operation	Not applicable	None required	Less Than Significant
4.11.2 Public Services – Police Protection			
POLICE PROTECTION			
Construction	See Project Design Features POL-PDF-1 (Project Site Security and Access During Construction) and TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
Operation	See Project Design Feature POL-PDF-2 (Project Site Security and Access During Operation), below.	None required	Less Than Significant
4.12 Transportation			
CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES	See Project Design Feature TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) - VEHICLE MILES TRAVELED (VMT)	See Project Design Feature TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
GEOMETRIC HAZARDS	Not applicable	None required	Less Than Significant
EMERGENCY ACCESS	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.13 Tribal Cultural Resources			
TRIBAL CULTURAL RESOURCES	Not applicable	See Mitigation Measures CUL-MM-2 and TCR-MM-1 through TCR-MM-3, below.	Less Than Significant with Mitigation
4.14.1 Utilities and Service Systems – Water Supply			
WATER INFRASTRUCTURE	See Project Design Features WATER-PDF-1 (Water Conservation) and TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
WATER SUPPLY	See Project Design Feature WATER-PDF-1 (Water Conservation), below.	None required	Less Than Significant
4.14.2 Utilities and Service Systems – Wastewater			
WASTEWATER INFRASTRUCTURE	See Project Design Features WATER-PDF-1 (Water Conservation) and TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
WASTEWATER TREATMENT CAPACITY	See Project Design Feature WATER-PDF-1 (Water Conservation), below.	None required	Less Than Significant
4.14.3 Utilities and Service Systems – Solid Waste			
SOLID WASTE GENERATION	Not applicable	None required	Less Than Significant
4.14.4 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Facilities			
ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS INFRASTRUCTURE	See Project Design Feature GHG-PDF-1 (Green Building Features), below.	None required	Less Than Significant

SOURCE: ESA, 2022.

ES.5.1 Project Design Features

Aesthetics

AES-PDF-1: Construction Fencing. Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

AES-PDF-2: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.

AES-PDF-3: Glare. Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit.

AES-PDF-4: Lighting. Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent or nearby uses.

Greenhouse Gas Emissions

GHG-PDF-1: **Green Building Features.** The Project will include the following green building features:

- The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code and Culver City's Green Building Program Requirements.
- The Project design will include sustainability features that will result in increased energy efficiency including water efficiency measures for landscaping and rainwater management, high efficiency plumbing fixtures, energy-star labeled appliances where possible and energy-efficient and water conserving HVAC systems.

Noise

NOI-PDF-1: Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to abutting property owners and occupants. Evidence of such notification will be provided to the appropriate department of City of Culver City and City of Los Angeles. The notice will identify the commencement date and proposed timing for

all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).

NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating vibratory pile drivers and drills will be used.

NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified for such incidences., These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of both cities.

NOI-PDF-4: Compliance with Noise Element. The following noise standards from Policy 2.A of the City of Culver City's General Plan Noise Element will be complied with at all times:

a) No construction equipment will be operated without an exhaust muffler, and all such equipment will have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original manufacturer supplied equipment;

b) All construction equipment will be properly maintained to minimize noise emissions;

c) If any construction vehicles are serviced at an on-site location, the vehicle(s) will be setback from any street and other property lines so as to maintain a distance of at least 100 feet from the public right-of-way and from Noise Sensitive Receptors;

d) Noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) will be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding as approved by the Planning Manager;

e) The Project will not allow any delivery truck idling for more than 5 minutes in the loading area. Signs will be posted prohibiting such idling.

NOI-PDF-5: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.

NOI-PDF-6: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources and City of Los Angeles Municipal Code Section 112.02 through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.

NOI-PDF-7: Loading Dock Operating Hours. On-site loading dock operating hours will be limited to 7:00 a.m. to 10:00 p.m.

NOI-PDF-8: Noise Control –Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in the central courtyard such that the sound would be blocked by the proposed on-site building from off-site receivers. No amplified sound

systems would be installed in the publicly accessible areas along the Project's street frontages. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. The systems will be designed so as not to result in a perceivable increase in noise beyond the Project Site. Specifically, daytime outdoor amplified sound systems will not result in an increase of 3 dBA L_{eq} over existing ambient noise conditions at the Project property line. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section 111.02, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction. All speakers will have a minimum setback of 25 feet from the Project property line and will be directed internally and acoustically shielded from off-site uses. Under the rare occasion of maximum crowd gathering in the central courtyard with temporary amplified sound systems, the combined sound level from speakers and people conversation shall not exceed the ambient noise level plus 5 dBA at an adjacent property line, which would limit the speaker sound level to a maximum of 90 dBA when measured at a distance of 50 feet from the speakers. A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City and City of Los Angeles that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.

Police Services

POL-PDF-1: Project Site Security and Access During Construction. During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.

POL-PDF-2: Project Site Security and Access During Operation. During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will 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).

Transportation

TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning managers for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

Prior to commencement of construction, the contractor will advise each City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City and/or City of Los Angeles staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community:

1. Construction schedule and hours.
2. Framework for construction phases.
3. Identify traffic diversion plan by phase and activity.
4. Potential location of construction parking and office trailers.
5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
6. Emergency access plan.
7. Demolition plan.
8. Staging plan for the concrete pours, material loading and removal.
9. Crane location(s).
10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
11. Community notification procedures.

The FCMP will at a minimum include the following:

1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations.
2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided.
3. Construction plans and procedures to address community and both the appropriate Cities of Culver City and Los Angeles personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses.

4. Procedures for the training and certification of flag persons.
5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by either the City of Culver City or the City of Los Angeles, depending on the jurisdiction of the roadway. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles and City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the fire and police departments of each City to minimize potential effects on traffic flow and emergency response.
8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.

TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement the following TDM measures subject to Culver City Transportation Department and LADOT review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site:

- **TDM Support Services:** The Project will offer tailored trip planning assistance with in-house TDM coordinators. Assistance will be available for all employees online, by email, and by phone. The Project will also host a virtual kiosk every week to chat with a team member and have any questions answered.
- **Marketing and Communications:** The Project will provide a comprehensive website detailing alternative transportation options such as carpool, rail, shuttle, coach, bike, and options available for transportation once on campus. To provide transportation information to new employees, the Commute Program will make a presentation at New Employee Orientation. The Commute Program will also actively monitor email lists and group lists to discuss and collaborate with employees on improving commute programs. Information dissemination tools will include monthly news updates, web updates, email templates, lobby information centers, communication regarding service expansions, and attending internal employee events.
- **Public Transit:** The Project will be served by an existing fixed-route intercampus shuttle program to provide connections to other Applicant-occupied buildings in Culver City and to public transit. The Project will also offer a monthly transit subsidy which provides a financial incentive for riding transit instead of driving to the Project Site.
- **Rideshare:** The Project will provide an online tool that matches riders with drivers originating from similar locales. This will reduce single occupancy vehicle trips to and from the Project.

- **Bicycling:** In addition to providing Code-required bicycle parking and shower facilities, the Project will provide a monthly subsidy to employees who commute by bicycle to work, which can be used to pay for bicycle, maintenance, and storage, or towards upgrading an existing bicycle or purchasing a new bicycle. The Project will also promote cycling by participating in the County's annual Bike to Work Day, providing discounts on select cycling products, providing a website that has information on safe cycling and cycling apps.
- **Walking:** The Project will provide enhanced access points to the site to improve pedestrian connectivity and expand adherence to the Americans with Disabilities Act (ADA). Employees will be educated on local neighborhood destinations within walking distance and will be encouraged to walk to events, meetings, and meals whenever possible. The areas surrounding the walkways and sidewalks will be well-landscaped and maintained, with pedestrian-oriented lighting to contribute to the safety of walking at night.
- **Pre-tax Commuter Benefit:** A pre-tax commuter benefit will be provided to employees for commute-related expenses such as public transit (after the transit subsidy), vanpooling, and parking. The commuter benefit will supplement the transit and bicycle subsidies.
- **Commuter Club:** A Commuter Club is an opt-in program that offers employees the opportunity to receive Commute Program email updates about schedule updates, new service, events, and programs.
- **Commute Expert Program:** This program will provide people using a commute alternative an opportunity to meet other employees who are using the same mode who can "mentor" them by providing answers to questions about using that mode, stop locations, routes, or local transit options.
- **Guaranteed Ride Home Program:** The Project will sponsor a guaranteed ride home for Project Site employees who came to work without their own car in the event of an unexpected situation or emergency when walking, biking, carpooling, or taking transit home will not be feasible.
- **Intercampus Shuttles:** The Project will provide on-request and fixed route intercampus shuttles between other buildings occupied by the Applicant during work hours.
- **Campus Bike Share Program:** A Campus Bike Share program will be implemented to provide a transportation option between other buildings occupied by the Applicant. Campus bikes will be equipped with GPS tracking and an electronic rear-wheel lock to help secure the fleet. Campus bikes will be managed and maintained by a local bike maintenance vendor.
- **On-site Services:** The Project will provide its employees with on-site amenities such as a full-service cafeteria, coffee bars, and shower facilities. The offered services will contribute to limiting the number of vehicle trips employees will need to take off-site during the day.

Utilities and Service Systems – Water Supply

WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following:

- **Fixtures**
  - High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less
  - Showerheads with a flow rate of 1.5 gallons per minute, or less
  - All utility, service and mop sinks will have a maximum flow rate of 1.5 gallons per minute

  - Condensate drain water capture and reuse for irrigation
  - An air cooled / air source mechanical cooling system will be utilized in lieu of cooling towers.

- **Landscape and Irrigation**
  - California Friendly® plants or native plants
  - Drip/ Subsurface Irrigation (Micro-Irrigation)
  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
  - Weather Based Irrigation Controllers
- **Utilities**
  - Individual metering and billing for water use for every commercial unit

ES.5.2 Mitigation Measures

Air Quality

AQ-MM-1: Construction Equipment Features. The Project shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment equal to or greater than 50 horsepower that will be used during any portion of the construction activities shall meet or exceed the Tier 4 Final standards. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. Alternate construction equipment may be used if the construction contractor can document that the equipment would achieve the same or greater NOx reductions compared to Tier 4 Final standards. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for SCAQMD SOON funds. Information including the SCAQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities
- During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance

with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.

- Construction activities shall be discontinued during an Air Quality Index (AQI) of 151 or more (unhealthy level). A record of any AQI at an unhealthy level and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

Cultural Resources

CUL-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.

Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

CUL-MM-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City (City) to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered

resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

CUL-MM-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

Geology and Soils

GEO-MM-1: Prior to the issuance of grading permits, the Applicant shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and Project progress meetings, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

GEO-MM-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per SVP Guidelines (2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on-site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall

be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.

GEO-MM-3: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.

Hazards and Hazardous Materials

HAZ-MM-1: Health and Safety Plan. Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition on parcels within the Project Site, the Applicant for the specific work proposed shall require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).

The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. HASPs shall be submitted to Culver City and the City of Los Angeles building departments and any applicable oversight regulatory agency for review before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The HASP shall include, but not be limited to, the following elements:

- Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP.
- A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals.
- Specified personal protective equipment and decontamination procedures, if needed.

- The requirement to prepare documentation showing that HASP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees).
- A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor.
- Emergency procedures, including the route to the nearest hospital.
- Procedures to follow if evidence of potential soil or groundwater contamination is encountered (such as soil staining, noxious odors, debris or buried storage containers). These procedures shall be followed in accordance with hazardous waste operations regulations and specifically include, but not be limited to, immediately stopping work in the vicinity of the unknown hazardous materials release; notifying the city within which the contamination is encountered and the regulatory agency overseeing site cleanup, if any; and retaining a qualified environmental firm to perform sampling and remediation, if warranted.

HAZ-MM-2: Soil and Groundwater Management Plan. In support of the HASP described in Mitigation Measure HAZ-MM-1, the contractor conducting excavation and disposal of fill and soil shall develop and implement a soil and groundwater management plan (SGMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity to manage contaminated materials, if encountered. The SGMP shall include the following, at a minimum:

- Site description, including the hazardous materials that may be encountered.
- Roles and responsibilities of on-site workers, supervisors, and the regulatory agency.
- Training for site workers focused on the recognition of and response to encountering hazardous materials or unknown structures, e.g., underground storage tanks (USTs).
- Notification requirements in the event of discovery of unknown structures or contamination.
- Protocols for the materials (fill, soil, and dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.
- Reporting requirement to the overseeing regulatory agency, if any contamination is found that requires agency oversight, documenting that site activities were conducted in accordance with the SGMP.

The SGMP shall be submitted to Culver City and the City of Los Angeles Building Departments for review to inform their permit approval process before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The contract specifications shall mandate full compliance with all applicable federal, state, and local regulations related to the identification, transportation, and disposal of hazardous materials.

The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations

identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction.

For work that would encounter groundwater, as part of the SGMP, contractors shall include a groundwater dewatering control and disposal plan specifying how groundwater (dewatering effluent) will be handled and disposed of in a safe, appropriate, and lawful manner. The groundwater portion of the SGMP shall include the following, at a minimum:

- The locations at which groundwater dewatering is likely to be required.
- Test methods to analyze groundwater for hazardous substances.
- Appropriate treatment and/or disposal methods.
- Discussion of discharge to a publicly owned treatment works or the stormwater system, in accordance with any regulatory requirements the treatment works may have, if this effluent disposal option is to be used.

Noise

NOI-MM-1: Prior to the commencement of demolition, the Project shall provide a temporary 12-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north and west. In addition, a temporary 6-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 5 dBA along the southern boundary along Washington Boulevard, between the Project Site and the residences to the south and east of the Project Site. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the nearby noise-sensitive receptors during the duration of construction activities to the extent feasible. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel. At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions.

NOI-MM-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that

provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

Tribal Cultural Resources

TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project.

Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.

Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.

TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with

the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.

The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).

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CHAPTER 1
Introduction

This Draft Environmental Impact Report (EIR) has been prepared for the Crossings Campus Project (formerly Project Crossings) (Project). Culver Crossings Properties LLC, the Applicant, proposes to develop two buildings up to five stories that would provide a total of 536,000 square feet (sf) of new office floor area, which is intended to be occupied by Apple Inc. on an approximately 4.46-acre (194,334 sf) site. The 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 proposed office buildings would be designed to accommodate creative office uses and could include associated production spaces for small format 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, a publicly accessible, privately maintained amenity area along Washington Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

1.1 Purpose of the Draft EIR

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

The City of Culver City is responsible for processing and approving the Project pursuant to CEQA Statute Section 21067. The City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including but not limited to the Initial Study and a Final EIR. The EIR will be used in connection with other permits and approvals necessary for the construction and operation of the Project. The EIR will be used by the City of Culver City 's Current Planning Division, Building Safety Division, Public Works Department, the City of Los Angeles City Planning Department, and any other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with CEQA Guidelines Section 15121, this Draft EIR is an informational document that will inform public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15093(b), if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a "statement of overriding considerations."

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

1.2 EIR Scoping Process

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

1.2.1 Initial Study

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

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project, and

provides mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics (for informational purposes)
- Air Quality
- Cultural Resources
  - Historical Resources
  - Archaeological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
  - Fire Protection
  - Police Protection
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
  - Water Supply
  - Wastewater
  - Solid Waste
  - Electric Power, Natural Gas, Telecommunications Facilities

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are discussed briefly as a part of Chapter 6, *Other CEQA Considerations*, of this Draft EIR. The analyses supporting these determinations are provided in the Initial Study included as Appendix A-2 of this Draft EIR.

1.2.2 Notice of Preparation

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 46-day review period commencing November 4, 2021, and ending December 20, 2021. The purpose of the NOP was to provide formal notice that the City was preparing a Draft EIR for the Project, and to solicit input

regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1 of this Draft EIR for a copy of the NOP.

1.2.3 EIR Scoping Meeting/Community Meeting

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments, and receive feedback in association with the entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the EIR Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The virtual Community Meeting and EIR Scoping Meeting were held on December 6, 2021, with the Community Meeting starting at 6:00 P.M. followed by the EIR Scoping Meeting at 7:00 P.M. The EIR Scoping Meeting was held in an online format using Zoom and provided interested individuals, groups, and public agencies the opportunity to view materials and ask questions regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials from the EIR Scoping Meeting are provided in Appendix A-3 of this Draft EIR.

1.2.4 Comments Received

During the public review period for the NOP, 38 commenters submitted responses to the NOP. Correspondence was received from various agencies which included the State of California Department of Transportation (Caltrans), Native American Heritage Commission (NAHC), South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), Los Angeles Department of Water and Power (LADWP), and the City of Los Angeles Bureau of Sanitation (LASAN), interested organizations, and interested parties. All written comments are provided in Appendix A-4, of this Draft EIR and summarized in the Executive Summary.

1.3 Format of the Draft EIR

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

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

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

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

3. **Environmental Setting.** This chapter presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This section also provides a list and the mapped locations of past, present, and probable future projects considered in the analysis of potential Project contributions to cumulative impacts.

4. **Environmental Impact Analysis.** This chapter contains the environmental setting, regulatory framework, methodology, thresholds to determine level of significance, Project Characteristics and/or project design features, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: 1) Aesthetics (for information purposes); 2) Air Quality; 3) Cultural Resources (including historical resources and archaeological resources); 4) Energy; 5) Geology and Soils; 6) Greenhouse Gas Emissions; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use and Planning; 10) Noise; 11) Public Services – Fire Protection and Police Protection; 12) Transportation; 13) Tribal Cultural Resources; and 14) Utilities and Services Systems – Water Supply, Wastewater, Solid Waste, and Electric Power, Natural Gas, and Telecommunications Facilities.

5. **Alternatives.** This chapter describes a reasonable range of alternatives to the Project, including the (1) No Project/No Build Alternative, (2) Zoning-Compliant Alternative; (3) Reduced Project Alternative; and (4) Alternate Project Access Alternative. This chapter also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR, though not at the same level of detail as analyzed for the Project.

6. **Other CEQA Considerations.** This chapter includes a discussion of issues required by CEQA that are not covered in other chapters. This includes irreversible environmental changes, significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, growth-inducing impacts, potential secondary effects related to Project mitigation measures, effects found not to be significant in the Initial Study, and effects found to be less than significant in the Draft EIR (before mitigation).

7. **References.** This chapter lists the references and sources used in the preparation of this Draft EIR.

8. **List of EIR Preparers and Organizations and Persons Contacted.** This chapter lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.

9. **Standard Terms, Acronyms and Abbreviations.** This chapter provides a reference listing of the common terms, acronyms and abbreviations that are used throughout this document, as well as definitions of key terms.

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

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and Comments on the NOP
  - A-1 Notice of Preparation
  - A-2 Initial Study
  - A-3 Scoping Meeting Materials
  - A-4 Comments on the NOP
- Appendix B – Air Quality and Greenhouse Gas Emissions Calculations
- Appendix C – Historical Report
- Appendix D – Archaeological Resources Report
- Appendix E – Energy Calculations
- Appendix F – Geotechnical Report
- Appendix G – Paleontological Resources Assessment Report
- Appendix H – Phase I ESA
- Appendix I – Hydrology Report
- Appendix J – Land Use Plans and Policies – Project Comparison Tables
- Appendix K – Noise Calculation Worksheets
- Appendix L – Public Services Request for Information Responses
  - L-1 Culver City Fire Department Correspondence
  - L-2 Los Angeles Fire Department Correspondence
  - L-3 Culver City Police Department Correspondence
  - L-4 Los Angeles Police Department Correspondence
- Appendix M – Transportation Impact Study
- Appendix N – Tribal Cultural Resources Documentation
- Appendix O – Water Supply Assessments
  - O-1 GSWC WSA
  - O-2 LADWP WSA
- Appendix P – Utility Report
- Appendix Q – Solid Waste Calculations

1.4 Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of CEQA Guidelines Sections 15085(a) and 15087, the City of Culver City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published

a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library, Los Angeles Central Library, Baldwin Hills Branch Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website (https://www.culvercity.org/City-Projects/G-Planning-Projects); (5) sent a NOA to all property owners within 1,000 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. Proof of publication is available at the Culver City Current Planning Division. The public review period commenced on July 21, 2022 and will end on September 6, 2022 for a total of 48 days.

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

Mail: Jeff Anderson
Planning Staff
City of Culver City Current Planning Division
9770 Culver Boulevard
Culver City, California 90232

Email: jeff.anderson@culvercity.org

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

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

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CHAPTER 2
Project Description

2.1 Introduction

Culver Crossings Properties LLC, the Applicant, proposes to develop the Crossings Campus Project (Project) (formerly known as Project Crossings), an office 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 8833 and 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 result in two buildings up to five stories that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple Inc. Building 1 on the Culver City Parcel would be four-stories tall, while Building 2 on the Los Angeles Parcel would be between four and five stories tall. The two buildings would be designed with distinct operational building systems, such as separate heating, ventilation, and air conditioning (HVAC) systems and utility service, but would be constructed with a shared wall and openings that allow a direct connection between the two buildings. The Project would provide a total of 1,216 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 175 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 small format 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, a publicly accessible, privately maintained amenity area along Washington Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

2.2 Project Location and Surrounding Uses

The Culver City Parcel is located to the east of the Downtown District of Culver City and in the Washington National Transit Oriented Development District. 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 two freeways; the Santa Monica Freeway (I-10) located approximately 630 feet

north of the Project Site and the San Diego Freeway (1-405), located approximately 2.09 miles west of the Project Site. See **Figure 2-1**, *Regional and Project Vicinity Locations*, for the location of the Project Site. See **Figure 2-2**, *Project Location – Aerial Photograph*, for an aerial image of the Project Site and surrounding development. As described in Section 2.6.4, *Vehicular and Bicycle, Circulation, and Parking*, the Project Site is also served by the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and multiple Metro and local bus lines that provide service 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 Complex 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. Existing buildings on the Project are set back approximately 24 feet from the Helms Bakery Building and are only approximately 2 feet off the property line at Venice Boulevard.

The parcels surrounding the Project Site in Culver City have a General Plan land use designation of General Corridor. The parcels 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.

2.3 Existing Conditions

The Project Site is currently improved with single single-story 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, street edge, and building perimeter planting.

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 an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. 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.

SOURCE: Open Street Map, 2021

Crossings Campus

Figure 2-1
Regional and Project Vicinity Locations

ESA

SOURCE: Nearmap, 2021

Crossings Campus

Figure 2-2
Project Location – Aerial Photograph

ESA

2.4 Existing General Plan Land Use and Zoning

The Culver City Parcel is zoned Industrial General (IG) and has 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 Transit Oriented District), the Washington/National Transit Oriented District Streetscape Plan area (Transit Oriented District 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 "D" 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 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" Line.

2.5 Statement of Project Objectives

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." CEQA Guidelines Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to provide a creative office campus for innovative entertainment, media, and/or technology companies. The Project's specific objectives are as follows:

- Develop an integrated Project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.
- Support City of Culver City, City of Los Angeles, and regional goals and polices to reduce vehicle miles traveled and associated greenhouse gas and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.

- Provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy.
- Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.
- Provide an amount of parking that satisfies anticipated demand on the Project Site but does not undercut transit usage.
- Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.
- Provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site.
- Support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.

2.6 Description of Proposed Project

2.6.1 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 536,000 sf 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 two 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 478 vehicular parking spaces and 51 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.[1] 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, a 7,120 sf publicly accessible, privately maintained amenity area along Washington Boulevard, as well as 51,600 sf internal courtyard for the use of employees and occasional private tenant events. **Table 2-1**, *Existing and Proposed Floor Area*, provides a summary of the proposed floor area. **Figure 2-3**, *Conceptual Site Plan*, provides an illustration of the site plan for the Project.

[1] The estimated occupant projections are based on the tenant's operational space planning for office buildings and similar existing facilities operated by the tenant.

TABLE 2-1
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 (Building 1)	18,821 sf	18,821 sf	167,000 sf	148,179 sf
Los Angeles Parcel (Building 2)	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**

NOTE: sf = square feet.

SOURCE: Gensler, 2022.

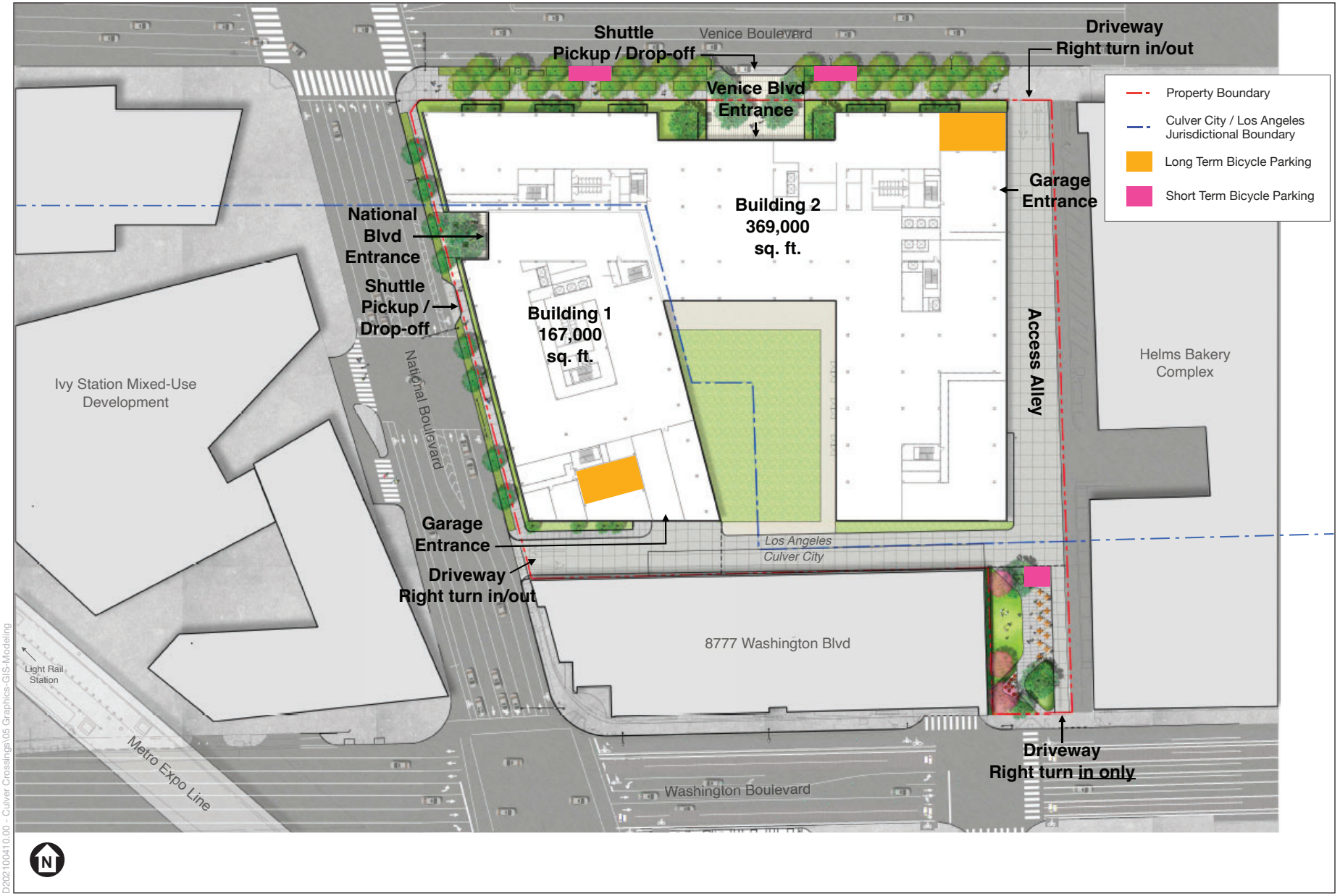
2.6.2 Architectural Design

The Project is proposing a contemporary architectural design defined by simple lines, along with a neutral and unified color palette, as discussed below. **Figure 2-4**, *Conceptual Project Rendering – National Boulevard Building 1 West Elevation*, is a rendering of the Project's Building 1 entrance along National Boulevard. **Figure 2-5**, C*onceptual Project Rendering – Venice Boulevard Building 2 North Elevation*, is a rendering of the Project as viewed from Venice Boulevard. **Figure 2-6**, *Conceptual Project Rendering – Southeast Corner of Venice Boulevard and National Boulevard*, provides a rendering of the Project as viewed from the intersection of Venice Boulevard and National Boulevard.

Buildings 1 and 2 would feature full height glazing defined by horizontal architectural projections overhanging each of the stories. The projections would be 11 feet, six inches deep along the exterior west façade of Building1, and a maximum of 11 feet, six inches deep along the exterior north façade of Building 2. The horizontal definition of the projections would create a stratified articulation of the buildings, reducing their perceived visual mass. The projections would also provide shading and passive solar control to reduce cooling loads on building interiors. Lastly, the projections may function as outdoor terraces that would be located at floors two through four along the National Boulevard and at floors two through five along the Venice Boulevard frontages. Outdoor terraces would also be provided within the interior courtyard to allow for indoor/outdoor use and fresh air circulation in the buildings.

The step back implemented at the fifth floor of Building 2, featuring a one-story pavilion that is distinct from the lower stories, would also reduce the mass of the building relative the Helms Bakery Complex to the east of the Project Site.

The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's exterior glazing at street level would enhance the façade transparency and engagement with the sidewalk. The main entrances into the two buildings would be at street level, recessed back from the sidewalk, and featuring full height glazing. The Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while being open and transparent as viewed from a distance. Building 1 would have a single broad entryway with a length of at least 40 feet, and a depth varying from approximately 34 to 45 feet on National Boulevard. Building 2 would have a single broad entryway with a length of 144 feet, and depth of 32 feet on Venice Boulevard.



D202100410.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: Gensler, 2022

Crossings Campus

Figure 2-3
Conceptual Site Plan

ESA

D2021004100.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: Gensler, 2022

Crossings Campus

Figure 2-4
Conceptual Project Rendering - National Boulevard Building 1 West Elevation

ESA

D2021004100.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: Gensler, 2022

Crossings Campus

Figure 2-5
Conceptual Project Rendering - Venice Boulevard Building 2 North Elevation

ESA

D2021004100.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: Gensler, 2022

Crossings Campus

Figure 2-6
Conceptual Project Rendering - Southeast Corner of Venice Boulevard and National Boulevard

ESA

In addition to full height glazing, exterior walls for both office buildings would feature sections of horizontal slatted screen at building corners on Venice and National Boulevards, where they create a framing affect for the facades. The screens would help to further define the horizontality of the building exterior, incorporating a sense of scale and a varied visual effect, while also contributing to the passive cooling of the interior.

Rooftop mechanical features, such as elevator shafts, would be screened by the same materials and vertical design implemented in the horizontal slatted screens and would, thus, be architecturally coordinated into the building design. In Building 1, the mechanical screen would be a single feature, whereas in Building 2, the screened features would occur on sections of Building 2 above the fourth and fifth floors, thus, softening the massing of the roofline. To reduce the visual prominence of the mechanical screens, the screens would be stepped back from the exterior walls of Building 1 and 2. Building 2 would provide step backs at approximately 56 feet. The different heights of Building 1 (56 feet to the tops of the roof and 66 feet, 6 inches to the top of the mechanical screen) and Building 2 (56 to 75 feet respectively, to the top of the roof, and 81 feet to the top of the highest mechanical screen) would also contribute to the visual interest in the design of the Project's roofline.

The eastern edge of Building 2 would be set back over 28 feet from the eastern property line, maintaining a physical separation between the building and the adjacent west elevation of the historic Helms Bakery Building, which has an unornamented facade along the alleyway. The Venice Boulevard Building 2 façade would be set back over 37 feet, 6 inches from the street to the face of the building on the ground floor. The primary façade of the adjacent Helms Bakery Building along Venice Boulevard is setback approximately 25 feet from the Venice Boulevard curb. As compared to existing conditions, Building 2's setback from the curb would open and facilitate views of the Helms Bakery Building's Venice Boulevard façade, which features an Art Deco design and includes the prominent, historic Helms Bakery neon sign on the roof.

2.6.3 Open Space and Landscaping

The Project would incorporate public-facing landscaping along National Boulevard and Venice Boulevard. There are 19 existing street trees located along the boundaries of the Project Site.[2] These street trees would be removed under the Project. For any street tree removed in the City of Culver City, the Project would comply with the City's Transit Oriented District 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 of Culver 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 right-of-way. The size and location of the replacement trees would be determined by the Transit Oriented District Streetscape Plan and by the Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway.

[2] While a total of nineteen (19) street trees were identified by the Street Tree Report, nine (9) trees occur beyond the sidewalk and parkway area along National Boulevard, and are not regulated by the City of Culver City or City of Los Angeles.

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. The Venice Boulevard and National Boulevard Streetscapes would be enhanced with widened sidewalks, street trees and landscaped parkways, providing greater separation from the roadways and improving the pedestrian experience along the Project frontages. The Project would provide streetscape improvements, including a double row (colonnade) of trees along Venice Boulevard's 29-foot-deep public right-of-way. The Project would dedicate 15 feet along National Boulevard for a 7-foot-deep, landscaped parkway and 8-foot sidewalk. Based on jurisdictional requirements (Culver City/City of Los Angeles), six street trees would be planted along Building 1 frontage on National Boulevard and a total of 28 street trees would be planted along Building 2 frontages on Venice and National Boulevards (City of Los Angeles). Street trees could consist of *Platanus x Acerifolia* (London Plane) along Venice Boulevard and *Lagerstroemia indica* 'Natchez' (Crape Myrtle) along National Boulevard. Accent trees at building entrances could be *Ulmus parviflora* (Chinese elm).

Although open space is not required for the proposed non-residential uses pursuant to the Culver City Municipal Code (CCMC), Los Angeles Municipal Code (LAMC), or CPIO, the Project nonetheless proposes to provide open space and landscaping on the Los Angeles Parcel. The Project would include a 51,600-sf internal courtyard (available to Project employees and visitors), of which 39,000 sf would be landscaped. The private open space would consist of a central courtyard and terraces throughout the Project, which would be accessible from the Project's interior. The Project would also provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,326 sf of which would be landscaped. The publicly accessible, privately maintained amenity area would be located in the southeast corner of the Project Site and would be accessed from Washington Boulevard. In addition to landscaping, the purpose of the publicly accessible, privately maintained amenity area is to provide a small park-like setting with seating, or a flexible combination of coffee kiosk, bicycle co-op or flexible programed activities. 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 regionally appropriate, drought tolerant plants with seasonal variation (e.g., ornamental grasses, succulents such as agave and aloe, leafy groundcovers, colorful shrubs, and soft textured vegetation).

2.6.4 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 allows 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 Transit Oriented 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 would provide a 15-foot setback for pedestrian and landscaped areas at grade. Above grade

level, Building 1 would provide a dimension of 12 feet to face of glass and 6 inches to the street-facing edge of the projection, along National Boulevard with the overhangs providing passive solar shading.

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 approximately 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 requested in order 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 would better accommodate an integrated office complex.

Figure 2-7, *Conceptual Project Elevations*, provides elevations of Buildings 1 and 2 from National Boulevard and Venice Boulevard.

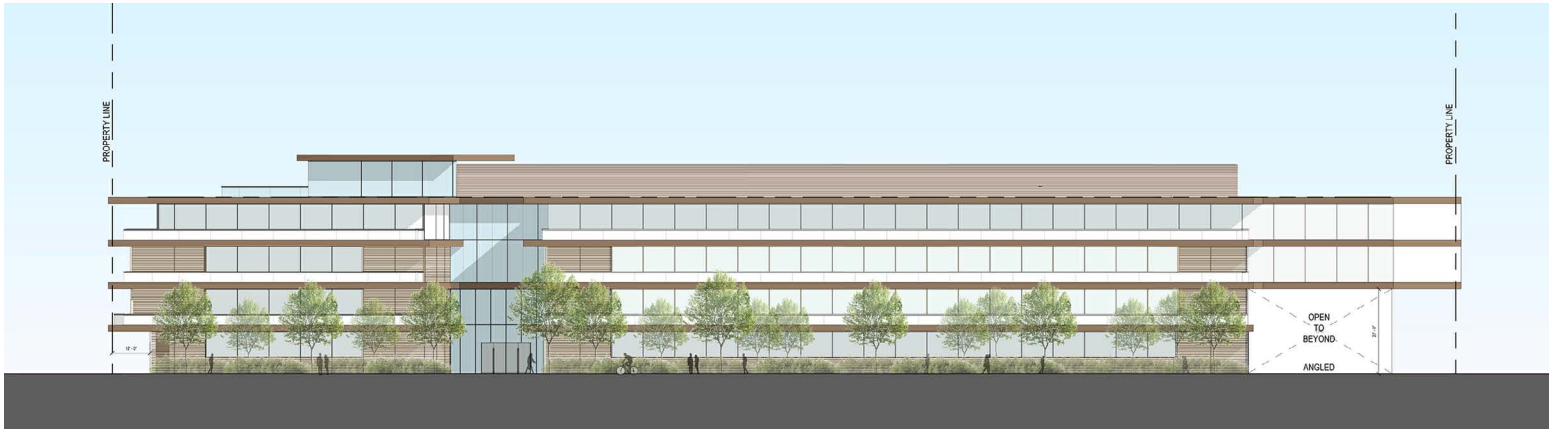
A Waiver of Dedication and Improvement ("WDI") would be requested to provide relief from the 15-foot dedication required for the portion of National Boulevard within the City of Los Angeles. In lieu of the dedication, the Project would include an easement for sidewalk purposes to provide at least a minimum 15-foot sidewalk and landscaping as required at the ground floor level by the Los Angeles 2035 Mobility Plan.

2.6.5 Vehicular and Bicycle 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 driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and a new driveway and curb cut adjacent to the existing Helms alley driveway along Venice Boulevard. All three driveways would provide right-turn only ingress and right-turn only egress. A third, secondary driveway from Washington Boulevard would provide right-turn ingress for employee vehicles and emergency vehicles to the Culver City and Los Angeles Parcels.

Pedestrian access to the buildings would be provided from entrances located on the perimeter of the Project Site from National Boulevard and Venice Boulevard. The Project would enhance pedestrian circulation and promote an active streetscape with connections to Helms Bakery Complex, Ivy Station, and the Metro "E" Line Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. The Project would include the development of a publicly accessible, privately maintained amenity area along Washington Boulevard.



National Boulevard Elevation - Building #1

Venice Boulevard Elevation - Building #2

SOURCE: Gensler, 2022

Crossings Campus

Figure 2-7
Conceptual Project Elevations

ESA

The Project would provide a total of 1,216 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 comply with the Comprehensive Plan in Culver City and the CPIO, as proposed to be amended in Los Angeles.

The Project would also provide a total of 175 bicycle parking spaces for employees and visitors, including short-term and long-term spaces, in compliance with respective City codes. Specifically, the Culver City Parcel would provide 17 short term bicycle parking spaces, and 34 long term bicycle parking spaces for a total of 51 bicycle parking spaces, which is above CCMC requirements of 5 percent (or 22 bicycle stalls). The Los Angeles Parcel would provide 37 short term bicycle parking spaces, and 87 long term bicycle parking spaces, for a total of 124 bicycle parking spaces, which is above LAMC requirements of 1/10,000 square feet of office space (short term) and 1/5,000 square feet of office space (long term) (or 111 bicycle stalls).

Public Transit

The Project Site is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by Metro, the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Most significantly, the Project Site is located one block east from the Culver City stop of the Metro "E" Line. 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" Line, Metro Bus Line 33, and Culver CityBus 1 all operate frequently with headways of 15 minutes or less 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.

Project Shuttle Service

The Project Site would be served by an existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Station. The shuttle would run between 8 a.m. and 6 p.m., Monday through Friday, with a 10-minute to 15-minute frequency. Specific pick-up/drop-off locations might include other Apple-occupied buildings in the area and the Culver City Station transit drop-off location on Robertson Boulevard. There would be two curbside cut-outs to serve as pick-up and drop-off areas for the Project Site, one located in front of Building 1 on National Boulevard, and the other in front of Building 2 along Venice Boulevard. The employee shuttle stop would be designed with sufficient distance as to not interfere with the function of the municipal bus stop located on the southeast corner of the Venice and National Boulevard intersection.

2.6.6 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 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.

2.6.7 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).

2.6.8 Sustainability Features

The Project would be designed to achieve US Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold equivalent, inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and California Green Building Standards (CALGreen) Building Code. 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, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; passive solar shading features; and active circulation.

2.6.9 Construction Schedule/Activities

A preliminary Construction Management Plan is required as part of the entitlement processing phase of the Project. This plan would define the scope and scheduling of planned construction activities, as well as the Applicant's proposed construction site management responsibilities, ensure minimal impacts to neighboring land uses, and avoid interruption of pedestrian, vehicle, and

alternative transportation modes and public transit. The Construction Management 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 Construction Management Plan (FCMP) 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 FCMP 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 290,000 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. Construction deliveries would take place during off-peak hours to minimize traffic disruptions. Deliveries would be staged at the curb lane along Venice Boulevard and National Boulevard, and tower cranes would be used to load the materials directly on to the Project Site. Hoisted materials would be stored on the Project Site and moved to the required level of the buildings via material hoists. All parking for construction personnel would be provided off-site, and construction workers would be prohibited from parking on neighborhood streets.

Although construction of the Project would be continuous and overlapping for the two buildings, to more accurately assess the emissions from each of the subphases, which would be temporally separated, the construction schedules were separated into two phases. Building 1 and Building 2 were separated assuming Building 1 begins in the first quarter of 2023 and is completed in the fourth quarter of 2024 and Building 2 begins in the third quarter of 2023 and ends in the fourth quarter of 2025. The first full Project operational buildout year would be in 2026.

2.7 Project Design Features

Project would implement a number of project design features that have been voluntarily incorporated into the Project that serve to minimize or avoid significant environmental effects. The project design features would be included in the Mitigation Monitoring and Reporting Program required in association with certification of the Draft EIR. The project design features are summarized in **Table 2-2**, *Summary of Project Design Features*, and are discussed in detail in the technical sections indicated in the table. The project design features are taken into account in the analyses of potential Project impacts.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Features
4.1 Aesthetics	
AES-PDF-1 (Construction Fencing)	Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.
AES-PDF-2 (Screening of Utilities)	Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.
AES-PDF-3 (Glare)	Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit.
AES-PDF-4 (Lighting)	Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent or nearby uses.
4.6 Greenhouse Gas Emissions	
GHG-PDF-1 (Green Building Features)	The Project will include the following green building features: • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code and Culver City's Green Building Program Requirements. • The Project design will include sustainability features that will result in increased energy efficiency including water efficiency measures for landscaping and rainwater management, high efficiency plumbing fixtures, energy-star labeled appliances where possible and energy-efficient and water conserving HVAC systems.
4.10 Noise	
NOI-PDF-1 (Project Construction Schedule)	Prior to issuance of a building permit, notice of the Project construction schedule will be provided to abutting property owners and occupants. Evidence of such notification will be provided to the appropriate department of City of Culver City and City of Los Angeles. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).
NOI-PDF-2 (Use of Impact Pile Driver)	The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating vibratory pile drivers and drills will be used.
NOI-PDF-3 (Construction Rules Sign)	During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified for such incidences., These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of both cities.

Project Design Feature #	Project Design Features
NOI-PDF-4 (Compliance with Noise Element)	The following noise standards from Policy 2.A of the City of Culver City's General Plan Noise Element will be complied with at all times: a) No construction equipment will be operated without an exhaust muffler, and all such equipment will have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original manufacturer supplied equipment; b) All construction equipment will be properly maintained to minimize noise emissions; c) If any construction vehicles are serviced at an on-site location, the vehicle(s) will be setback from any street and other property lines so as to maintain a distance of at least 100 feet from the public right-of-way and from Noise Sensitive Receptors; d) Noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) will be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding as approved by the Planning Manager; e) The Project will not allow any delivery truck idling for more than 5 minutes in the loading area. Signs will be posted prohibiting such idling.
NOI-PDF-5 (Neighborhood Streets)	No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.
NOI-PDF-6 (Mechanical Equipment Noise)	All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources and City of Los Angeles Municipal Code Section 112.02 through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.
NOI-PDF-7 (Loading Dock Operation Hours)	On-site loading dock operating hours will be limited to 7:00 a.m. to 10:00 p.m.
NOI-PDF-8 (Noise Control - Amplified Sound Systems)	If the Project installs permanent outdoor amplified sound systems, the systems will be located in the central courtyard such that the sound would be blocked by the proposed on-site building from off-site receivers. No amplified sound systems would be installed in the publicly accessible areas along the Project's street frontages. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. The systems will be designed so as not to result in a perceivable increase in noise beyond the Project Site. Specifically, daytime outdoor amplified sound systems will not result in an increase of 3 dBA L_{eq} over existing ambient noise conditions at the Project property line. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section 111.02, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction. All speakers will have a minimum setback of 25 feet from the Project property line and will be directed internally and acoustically shielded from off-site uses. Under the rare occasion of maximum crowd gathering in the central courtyard with temporary amplified sound systems, the combined sound level from speakers and people conversation shall not exceed the ambient noise level plus 5 dBA at an adjacent property line, which would limit the speaker sound level to a maximum of 90 dBA when measured at a distance of 50 feet from the speakers. A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City and City of Los Angeles that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.
4.11.2 Public Services – Police Protection	
POL-PDF-1 (Project Site Security and Access During Construction)	During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.

Project Design Feature #	Project Design Features
POL-PDF-2 (Project Site Security and Access During Operation)	During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will 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).
4.11 Transportation	
TRAF-PDF-1 (Construction Management Plan)	A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning managers for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments. Prior to commencement of construction, the contractor will advise each City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City and/or City of Los Angeles staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community: 1. Construction schedule and hours. 2. Framework for construction phases. 3. Identify traffic diversion plan by phase and activity. 4. Potential location of construction parking and office trailers. 5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6. Emergency access plan. 7. Demolition plan. 8. Staging plan for the concrete pours, material loading and removal. 9. Crane location(s). 10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers). 11. Community notification procedures. The FCMP will at a minimum include the following: 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations. 2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community and both the appropriate Cities of Culver City and Los Angeles personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation

Project Design Feature #	Project Design Features
	measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by either the City of Culver City or the City of Los Angeles, depending on the jurisdiction of the roadway. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles and City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the fire and police departments of each City to minimize potential effects on traffic flow and emergency response. 8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.
TRAF-PDF-2 (Transportation Demand Management (TDM) Program)	The Project will implement the following TDM measures subject to Culver City Transportation Department and LADOT review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site: • **TDM Support Services:** The Project will offer tailored trip planning assistance with in-house TDM coordinators. Assistance will be available for all employees online, by email, and by phone. The Project will also host a virtual kiosk every week to chat with a team member and have any questions answered. • **Marketing and Communications:** The Project will provide a comprehensive website detailing alternative transportation options such as carpool, rail, shuttle, coach, bike, and options available for transportation once on campus. To provide transportation information to new employees, the Commute Program will make a presentation at New Employee Orientation. The Commute Program will also actively monitor email lists and group lists to discuss and collaborate with employees on improving commute programs. Information dissemination tools will include monthly news updates, web updates, email templates, lobby information centers, communication regarding service expansions, and attending internal employee events. • **Public Transit:** The Project will be served by an existing fixed-route intercampus shuttle program to provide connections to other Applicant-occupied buildings in Culver City and to public transit. The Project will also offer a monthly transit subsidy which provides a financial incentive for riding transit instead of driving to the Project Site. • **Rideshare:** The Project will provide an online tool that matches riders with drivers originating from similar locales. This will reduce single occupancy vehicle trips to and from the Project. • **Bicycling:** In addition to providing Code-required bicycle parking and shower facilities, the Project will provide a monthly subsidy to employees who commute by bicycle to work, which can be used to pay for bicycle, maintenance, and storage, or towards upgrading an existing bicycle or purchasing a new bicycle. The Project will also promote cycling by participating in the County's annual Bike to Work Day, providing discounts on select cycling products, providing a website that has information on safe cycling and cycling apps.

Project Design Feature #	Project Design Features
	• **Walking:** The Project will provide enhanced access points to the site to improve pedestrian connectivity and expand adherence to the Americans with Disabilities Act (ADA). Employees will be educated on local neighborhood destinations within walking distance and will be encouraged to walk to events, meetings, and meals whenever possible. The areas surrounding the walkways and sidewalks will be well-landscaped and maintained, with pedestrian-oriented lighting to contribute to the safety of walking at night. • **Pre-tax Commuter Benefit:** A pre-tax commuter benefit will be provided to employees for commute-related expenses such as public transit (after the transit subsidy), vanpooling, and parking. The commuter benefit will supplement the transit and bicycle subsidies. • **Commuter Club:** A Commuter Club is an opt-in program that offers employees the opportunity to receive Commute Program email updates about schedule updates, new service, events, and programs. • **Commute Expert Program:** This program will provide people using a commute alternative an opportunity to meet other employees who are using the same mode who can "mentor" them by providing answers to questions about using that mode, stop locations, routes, or local transit options. • **Guaranteed Ride Home Program:** The Project will sponsor a guaranteed ride home for Project Site employees who came to work without their own car in the event of an unexpected situation or emergency when walking, biking, carpooling, or taking transit home will not be feasible. • **Intercampus Shuttles:** The Project will provide on-request and fixed route intercampus shuttles between other buildings occupied by the Applicant during work hours. • **Campus Bike Share Program:** A Campus Bike Share program will be implemented to provide a transportation option between other buildings occupied by the Applicant. Campus bikes will be equipped with GPS tracking and an electronic rear-wheel lock to help secure the fleet. Campus bikes will be managed and maintained by a local bike maintenance vendor. • **On-site Services:** The Project will provide its employees with on-site amenities such as a full-service cafeteria, coffee bars, and shower facilities. The offered services will contribute to limiting the number of vehicle trips employees will need to take off-site during the day.
4.14.1 Utilities and Service Systems – Water Supply	
WATER-PDF-1 (Water Conservation)	The Project will implement water conservation measures that include, but are not limited to, the following: • Fixtures – High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less – Showerheads with a flow rate of 1.5 gallons per minute, or less – All utility, service and mop sinks will have a maximum flow rate of 1.5 gallons per minute – Condensate drain water capture and reuse for irrigation – An air cooled / air source mechanical cooling system will be utilized in lieu of cooling towers. • Landscape and Irrigation – California Friendly® plants or native plants – Drip/ Subsurface Irrigation (Micro-Irrigation) – Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) – Weather Based Irrigation Controllers • Utilities – Individual metering and billing for water use for every commercial unit

SOURCE: ESA, 2022.

2.8 Anticipated Project Approvals

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

2.8.1 City of Culver City

- Planned Development ("PD") property rezoning and related Zone Change Map Amendment
- Approval of a Comprehensive Plan
- Approval for Extended Hours of Construction (CCMC Section 9.07.035.C.1)
- Certification of an Environmental Impact Report
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits

2.8.2 City of Los Angeles

- A boundary change to the Expo TNP to remove Los Angeles Parcel from the Specific Plan
- An Amendment to development standards of Subarea A of the CPIO
- Site Plan Review for a Project with greater than 50,000 sf of non-residential use
- A Waiver of Dedication and Improvement (WDI) to reduce the required public right-of-way dedication and provide an easement for a sidewalk along National Boulevard
- Approval of a Tree Removal Permit by the Board of Public Works
- Adoption of responsible agency findings under CEQA
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits

CHAPTER 3
Environmental Setting

3.1 Overview of Environmental Setting

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

3.1.1 On-Site Conditions

The approximately 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). 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 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. Primary regional access is provided by two freeways; the Santa Monica Freeway (I-10) located approximately 630 feet north of the Project Site and the San Diego Freeway (I-405), located approximately 2.09 miles west of the Project Site.

The Project Site is currently improved with single-story 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, street edge, and building perimeter planting.

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 an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. 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.

The Culver City Parcel is zoned Industrial General (IG) and has 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 “D” 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” Line.

3.1.2 Surrounding Uses

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 Complex 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.

The parcels surrounding the Project Site in Culver City have a General Plan land use designation of General Corridor. The parcels 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.

3.2 Related Projects

CEQA requires that EIRs analyze cumulative impacts. As defined in CEQA Guidelines Section 15355, a cumulative impact would result from the combination of the project evaluated in the EIR together with other projects that would cause related impacts. CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measures designed to alleviate the cumulative impact. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

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

Under CEQA Guidelines Section 15065(a)(3), a project has "cumulatively considerable" or significant cumulative impacts, when its incremental effects "are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

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

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

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

For the Project's cumulative impacts analysis, a list of related projects is used as the primary basis for evaluation. Consistent with CEQA Guidelines Section 15130(b)(3), the City has determined in its independent judgement, based on the size and scale of the Project analysis and related projects in the area, 1.5 miles is the appropriate radius applied for the identification of related projects for this Project. This distance includes a portion of the City of Los Angeles. The list is based on information obtained from the Culver City Engineering Division and Planning Division and City of Los Angeles Department of Transportation (LADOT). The list of 52 related projects is provided in **Table 3-1**, *Related Projects List*, with their locations identified in **Figure 3-1**, *Related Projects Map*. Of the 52 related projects, 34 are located within the City of Culver City and 18 are located within the City of Los Angeles. Although the projects listed in Table 3-1 serve as the primary basis for evaluation of cumulative impacts, the related projects or methodology used to address cumulative impacts may vary among certain environmental issues and topics due to their unique characteristics. The cumulative analyses for each environmental issue, including the identification of relevant related projects are provided in their applicable sections in Chapter 4, *Environmental Impacts Analysis*, of this Draft EIR.

TABLE 3-1
RELATED PROJECTS LIST

No. [a]	Location	Jurisdiction	Land Use	Size	Unit
1	5863 Washington Boulevard	City of Culver City	Creative Office	17.5	ksf
2	5773 W Adams Boulevard	City of Los Angeles	Apartments	65	DU
			Retail	2.3	ksf
3	3030 La Cienega Boulevard	City of Culver City	Retail	1.25	ksf
4	3301 S Canfield Avenue	City of Los Angeles	Apartments	50	DU
5	8700 Washington Boulevard	City of Culver City	Apartments	199	DU
			Live/Work Office	17.25	ksf
			Restaurant	5	ksf
			Retail	17.75	ksf
6	3200 S La Cienega Boulevard	City of Los Angeles	Apartments	254	DU
7	3321 S La Cienega Boulevard	City of Los Angeles	Mixed-Use Apartments	1,218	DU
			Office	200	ksf
			Retail	100	ksf
8	3336 Helms Avenue	City of Culver City	Condominiums	6	DU

No. [a]	Location	Jurisdiction	Land Use	Size	Unit
9	3434 Wesley Street	City of Culver City	Apartments	15	DU
			Office	14.237	ksf
10	3727 Robertson Boulevard	City of Culver City	Apartments	12	DU
			Commercial	3.950	ksf
11	3710 Robertson Boulevard	City of Culver City	Apartments	141	DU
			Creative Office	64.2	ksf
			Commercial	30.042	ksf
12	8570 National Boulevard	City of Culver City	Office	24	ksf
			Retail	4	ksf
13	3516 Schaefer Street	City of Culver City	Creative Office	9.338	ksf
14	3939 Landmark Street	City of Culver City	School	50	students
15	8888 Washington Boulevard	City of Culver City	Office	56.559	ksf
			Retail	5.972	ksf
16	3401 S La Cienega Boulevard	City of Los Angeles	Apartments	260	DU
			Office	277.543	ksf
			Retail	2.869	ksf
17	3739 S Cardiff Avenue	City of Los Angeles	Apartments	69	DU
18	8902 Hubbard	City of Culver City	Condominiums	1	DU
19	5860 W Jefferson Boulevard	City of Los Angeles	Office	344.947	ksf
20	4116 Higuera Street	City of Culver City	Condominiums	1	DU
21	3817 Watseka Avenue	City of Culver City	Office	149.439	ksf
22	8511 Warner Drive	City of Culver City	Retail/Restaurant	51.52	ksf
23	3577 S Overland Avenue	City of Los Angeles	Apartments	119	DU
			Restaurant	2	ksf
24	8509 Higuera Street	City of Culver City	School	100	students
25	9735 Washington Boulevard	City of Culver City	Office	55.477	ksf
			Retail	12.249	ksf
			Restaurant	4.147	ksf
26	8631 Hayden Place	City of Culver City	Creative Office	230	ksf
27	3664 S Overland Avenue	City of Los Angeles	Apartments	187	DU
			Restaurant	3.6	ksf
28	9814 Washington Boulevard	City of Culver City	Theater	200	seats
29	3841 S Dunn Drive	City of Los Angeles	Apartments	207	DU
30	LA County	City of Culver City	Community College	92	ksf
31	4080 Lafayette Place	City of Culver City	Condominiums	5	DU
32	5950 W Jefferson Boulevard	City of Los Angeles	Office	64	ksf
			Retail	2	ksf
			Restaurant	4	ksf

No. [a]	Location	Jurisdiction	Land Use	Size	Unit
33	6024 W Jefferson Boulevard	City of Los Angeles	Office	90.054	ksf
			Warehouse	50.775	ksf
			Manufacturing	53.762	ksf
			Coffee Shop	2.2	ksf
34	4044 Lincoln	City of Culver City	Apartments	4	DU
35	10424 W Venice Boulevard	City of Los Angeles	Mixed-Use Apartments	79	DU
36	9405 Jefferson Boulevard	City of Culver City	Office	65.8	ksf
37	10202 Washington Boulevard	City of Culver City	Office	45.85	ksf
38	9615 Lucerne Avenue	City of Culver City	Condominiums	2	DU
39	4044 Madison Avenue	City of Culver City	Condominiums	4	DU
40	10375 W Washington Boulevard	City of Los Angeles	Condominiums	139	DU
			Retail	1.969	ksf
41	4030 La Salle Avenue	City of Culver City	Condominiums	4	DU
42	4164 Lincoln	City of Culver City	Condominiums	2	DU
43	4170 Lincoln	City of Culver City	Condominiums	2	DU
44	3814 Lenawee Avenue	City of Culver City	Single-Family Homes	8	DU
			Assisted Living Facility	110	beds
45	4051 Jackson Avenue	City of Culver City	Condominiums	9	DU
46	9925 Jefferson Boulevard	City of Culver City	Creative Office	51.178	ksf
47	9930 Jefferson Boulevard	City of Culver City	Media Studio	84.475	ksf
48	5870 Jefferson Boulevard	City of Los Angeles	Office	328.867	ksf
49	10626 W Venice Boulevard	City of Los Angeles	Apartments	109	DU
			Retail	3.318	ksf
50	10417 W Washington Boulevard	City of Los Angeles	Apartments	111	DU
			Retail	2	ksf
51	9900 W Venice Boulevard	City of Los Angeles	Apartments	56	DU
			Retail	3	ksf
52	10003 Washington Boulevard	City of Culver City	Apartments	207	DU

NOTES: ksf = thousand square feet; du = dwelling units

[a] Related projects list based on information from City of Culver City and LADOT (May 2022).

SOURCE: Fehr & Peers, 2022.

SOURCE: Fehr & Peers, 2022

Crossings Campus

Figure 3-1
Related Projects Map

ESA

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CHAPTER 4
Environmental Impacts Analysis

Introduction

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

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources (Sections 4.3)
- Energy (Section 4.4)
- Geology and Soils (Section 4.5)
- Greenhouse Gas Emissions (Section 4.6)
- Hazards and Hazardous Materials (Section 4.7)
- Hydrology and Water Quality (Section 4.8)
- Land Use and Planning (Section 4.9)
- Noise (Section 4.10)
- Public Services: Fire Protection and Police Protection (Sections 4.11.1 and 4.11.2)
- Transportation (Section 4.12)
- Tribal Cultural Resources (Section 4.13)
- Utilities and Service Systems: Water, Wastewater, Solid Waste, and Electric Power, Natural Gas, and Telecommunications Facilities (Sections 4.14.1, 4.14.2, 4.14.3, and 4.14.4)

Based on the Initial Study, which is contained in Appendix A of this Draft EIR, public comments received during the NOP circulation period, and input received during the EIR Scoping Meeting, it was determined that several issue areas would not be subject to significant impacts due to implementation of the Project. Generally, these issue areas include Agricultural and Forestry Resources, Biological Resources, Mineral Resources, Public Services (Schools, Parks, and Libraries), Recreation, and Wildfire. Please see Chapter 6, *Other CEQA Considerations,* of this Draft EIR for a discussion of those issue areas for which a detailed analysis is not included and the basis for those determinations.

Environmental Impact

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

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

Terminology Used in This EIR

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

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

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

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

- Avoiding the impact by not taking a certain action or parts of an action;
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation;

- Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and,
- Compensating for the effect by replacing or providing substitute resources or environments.

Both project design features and mitigation measures will be adopted as part of the MMRP so that their implementation can be tracked by the City to ensure compliance.

4.1 Aesthetics

4.1.1 Introduction

This section provides information relative to aesthetic effects that could result from the Project regarding visual character, views, light and glare, and shading. This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community, identifies applicable laws, regulations, guidelines and policies relating to aesthetics, and evaluates potential aesthetic impacts related to implementation of the Project.

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

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

Because the Project is considered an employment center project[1] and is located on an infill site within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption of significant impact findings under SB 743. As such, no findings of significance are provided in this section. Nonetheless, the Project is compared to the respective thresholds herein only for information disclosure purposes.

Scenic Vistas

The term "scenic vista" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The City of Culver City and the City of Los Angeles recognize the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

Scenic Resources

Scenic resources refer to natural or manmade features of high aesthetic quality. Such features can include landscaping, heritage trees, or natural trees and landforms, as well as historic buildings and other structures with aesthetic value. Pursuant to CEQA Guidelines Appendix G, this area of

[1] Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area" The Culver City portion of the Site is zoned Industrial General (IG) and is within the East Washington Overlay (-EW), both of which allow commercial office uses. The portion of the Site located in the City of Los Angeles is zoned C2-2D-CPIO and is within the areas of the West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay (CPIO) and the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production, and neither the CPIO nor the Expo TNP restrict such uses.

consideration includes specific mention of such natural or manmade features when they are located within the viewshed of a State Scenic Highway.

Scenic Quality

Scenic quality refers to the visual appeal of an area and is informed by features that contribute to overall aesthetic character. Aesthetic features may include unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. Culver City and the City of Los Angeles have plans, policies and regulations that are relevant to the assessment of scenic quality, such as requirements for street trees, building setbacks, building heights, exterior lighting and signage.

Light and Glare

Sources of artificial light that operate during evening and nighttime hours may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses, such as residences and hotels, are considered light-sensitive because they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Activities, such as driving, and land uses, such as parks and residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities/uses.

4.1.2 Environmental Setting

Regulatory Framework

There are several laws, regulations, as well as local land use plans that include policies, requirements, and guidelines that relate to Aesthetics at the State and local levels. As described below, these laws, regulations, and plans include the following:

- Senate Bill No. 743
- Assembly Bill 1560
- California Scenic Highways
- California Historic Parkways
- Culver City General Plan
- Culver City Urban Forest Master Plan
- Culver City Municipal Code
- Other Culver City Plans
- Los Angeles General Plan Framework Element

- Los Angeles General Plan Conservation Element
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles Municipal Code
- Los Angeles Citywide Design Guidelines
- Other Los Angeles Plans

State

Senate Bill No. 743

Senate Bill (SB) 743, codified within PRC Section 21099 et. seq., states that "Aesthetic (…) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (PRC Section 21099(d)(1)). If a project meets these conditions, aesthetic impacts associated with the project would not be considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, ZI No. 2452 does not limit the ability of the City of Los Angeles to regulate or study aesthetic-related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code, or the City's General Plan, including specific plans.

Evaluation of a project's physical impacts associated with aesthetics is not required for an exempt project, such as this Project, and is provided for informational purposes only. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in Section 4.3, *Cultural Resources*, of this Draft EIR.

Pertinent definitions applicable to PRC Section 21099(a) and the Project include:

- "Infill site" means 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.
- "Transit priority area" means an area within one-half 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.
- "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.
- "Major transit stop" is defined by PRC Section 21064.3 to mean 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.

Projects that meet the criteria set forth in PRC Section 21099(d), are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of

significance related to aesthetics. The Project meets the criteria for exemption in that the Project Site is located in an urban area that has been previously developed as required for an "infill site"; all of the perimeter of the Project Site is located within 0.5 mile of a major transit stop (the existing Expo Rail Station for Culver City); and the Project would qualify as an "employment center project" because the existing zoning currently allows commercial uses within an existing transit priority area.

Assembly Bill 1560

Assembly Bill 1560, codified at PRC Section 21060.2, supplements PRC 21064.3 by defining "bus rapid transit" and "bus rapid transit station" as it relates to a major transit stop. Specifically, "bus rapid transit" means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

- Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods
- Transit signal priority
- All-door boarding
- Fare collection system that promotes efficiency
- Defined stations

Lastly, "bus rapid transit station" is defined within PRC 21060.2 as a clearly defined bus station served by a bus rapid transit.

California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, section 260 et seq. The intent of the system is to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the State highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by State and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. There are no State Scenic Highways within the City of Culver City. The nearest designated State Scenic Highway within the City of Los Angeles to the Project Site includes portions of the Topanga Canyon State Scenic Highway (State Route [SR] 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park, and is over 11 miles to the northwest of the Project Site. There are eligible State Scenic Highway sections of SR-1 in Los Angeles and Santa Monica to the west, with

nearest segment approximately 4.5 miles from the Project Site. Note that road segments within the City of Los Angeles that are listed as "eligible" for scenic highway designation in the Scenic Highway System List, such as the Pacific Coast Highway, do not fit the CEQA criteria for State Scenic Highways.

California Historic Parkways

Streets & Highways Code, Section 280 regulates the designation and maintenance of the system of California Historic Parkways. To be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat, or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

No designated Historic Parkways are located in the City of Culver City. The only designated Historic Parkway, the Arroyo Seco Parkway (SR-110), is located within the City of Los Angeles. This highway runs northeasterly from the four-level interchange with U.S. 101 just outside of downtown Los Angeles (mile post 23.69) to East Glenarm Street in the City of Pasadena (mile post 31.89).

Local

City of Culver City

Culver City General Plan

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

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) was adopted in 2015 to foster a robust and resilient urban forest. The UFMP articulates a clear vision for the future of Culver City's urban forest based on analysis of the City's historical and existing urban forest, as well as on synthesis of current research, best management practices and community input. The Plan provides guiding principles for both long-term and day-to-day management, comprehensive tree designations, technical standards, and resources for City and community members today and for the future. The UFMP provides recommendations for the City's urban forest as well as a structured framework of five Action Areas and related Strategies to support achievement of this vision. The recommendations also address important functions of the urban forest including wayfinding and placemaking. It also identifies a "Tree Palette" of recommended tree species for Culver City, as a process for selecting certain species for each location in the City. Areas of greatest need are

described as "Places of Priority." In the Project area, Washington Boulevard is defined as a "Place of Priority." Along with the other recommendations related to habitat and existing conditions, the UFMP's Tree Palette and Designations provide a plan for creating a more resilient urban forest in Culver City. As a master list of all the species that are recommended for Culver City's urban forest, the Tree Palette includes *Ulmus parvifolia*, or Chine Elm and other researched tree species.

Culver City Municipal Code

Culver City Municipal Code (CCMC) Titles 15 and 17 include regulations related to the aesthetics and visual character including landscaping, lighting, building heights, and setbacks, as described below.

Landscaping

CCMC Section 17.310. This section of the CCMC provides landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements and general landscaping and irrigation requirements. CCMC Section17.310.030 requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Preliminary Landscape Plan includes such features as proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary list of plant materials. The Final Landscape Plan identifies such features as plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

Building Height

CCMC Section 17.240.015.E. This section provides that no building or structure in the Planned Development (PD) Zone may exceed 56 feet in height, unless a height exception is granted pursuant to § 17.300.025 (Height Measurement and Height Limit Exceptions).

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

CCMC Section 17.300.035.C.1, Screening of Utilities, requires mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts), loading docks, refuse and recyclable materials storage areas, and utility services to be screened from public view from adjoining public streets and rights-of-way.

CCMC Section 17.300.035.C.2 requires the method of screening to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Director.

Lighting

CCMC Section 17.300.040, Outdoor Lighting. This section provides that exterior lighting shall comply with the following requirements:

1. All lighting fixtures shall be architecturally integrated with the character of the structure.

2. All lighting shall be energy-efficient and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site and shall be directed downward and away from adjoining properties and public rights-of-way.
3. Permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness.
4. Timers, where acceptable, shall be used to turn off lights during hours when they are not needed.
5. Uniformity or, where appropriate, compatibility of lighting type (i.e., height, wattage, energy efficiency, base support, finish material, texture, color and style of poles and luminaires) shall be provided.
6. Landscaping and pedestrian walkway lights shall be low profile.
7. Freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director, to mitigate any impacts to adjoining properties.
8. Security lighting shall be provided at all entrances/exits, except in a residential zone.

Signage

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

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

Art in Public Places

CCMC Section 15.06.100 et seq. establishes an Art in Public Places Program (APPP) to fund and develop cultural and artistic outlets to improve the environment, image, and character of the community. All new residential development of five or more units, and all commercial, industrial, and public building development projects, with a building valuation of $500,000 or more are subject to this requirement. The APPP allocation can be placed into a Cultural Trust Fund; used to commission original, site-specific artwork; used to donate artwork to the City; used to incorporate a Cultural Facility; or used to designate a building or portion thereof as “Architecture as Art;” as specified in this section.

Other Culver City Plans

Other plans that set forth design standards include the Culver City Redevelopment Plan for the Culver City Redevelopment Project and the Exposition Light Rail Transit and Station Design for Development. These plans are described in Section 4.9, *Land Use and Planning*, Subsection 4.9.2, *Regulatory Setting*, of this Draft EIR. Specific policies are discussed in detail in Appendix J (refer to Tables LU-4 and LU-5, respectively) of this Draft EIR and summarized in Section 4.9, *Land Use and Planning*, Subsection 4.9.4, *Project Impacts*, of this Draft EIR.

City of Los Angeles

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan.[2] The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development.[3] Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[4]

Chapter 5 of the Framework Element, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods.[5] "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City.[6] The land use forms and spatial relationships identified in the Framework Element are discussed in Section 4.9, *Land Use and Planning,* of this Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project's consistency with the Framework Element is provided in Section 4.9, *Land Use and Planning,* of this Draft EIR.

Los Angeles General Plan Conservation Element

The City's various landforms and scenic vistas are described in the General Plan Conservation Element. The hills and mountains within the City, and the Los Angeles River and its associated tributaries and floodplains, are identified as prominent topographic features.

The Conservation Element defines scenic vistas or vistas as the "panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features".[7]

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2 City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001.

3 City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 5, originally adopted December 11, 1996 and readopted August 8, 2001.

4 City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, Objective 5-5, originally adopted December 11, 1996 and readopted August 8, 2001.

5 City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, originally adopted December 11, 1996 and readopted August 8, 2001.

6 City of Los Angeles Department of City Planning, General Plan Framework, Executive Summary, originally adopted December 11, 1996 and readopted August 8, 2001.

7 City of Los Angeles Department of City Planning, General Plan Conservation Element. Originally adopted September 26, 2001.

West Adams–Baldwin Hills–Leimert Community Plan

The 35 Community Plans established throughout the City collectively comprise the Land Use Element of the City's General Plan. Community plans are intended to implement the policies of the Framework Element. Community plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land uses. The West Adams–Baldwin Hills–Leimert Community Plan (adopted June 2016) was adopted to implement the objectives of the Framework Element. Objectives and policies include aesthetic elements such as enhancing neighborhood character through better development standards and creating small parks, pedestrian districts, and public plazas.

Land Use and Urban Form goals of the Community Plan include the following:

- Objective LU 14: A community that conserves, enhances and regenerates its distinctive "main street" character by promoting continued pedestrian orientation of commercial areas.
- Policy LU14-1: Pedestrian Orientation. Foster preservation, conservation, maintenance and enhancement of existing pedestrian orientation along commercial and mixed-use boulevards.
- Policy LU14-2: Activate First Floor Frontages. Encourage the first floor street frontage of buildings, including parking structures, to incorporate commercial or other active public uses.
- Policy LU14.3: Architectural Excellence. Promote projects that are developed to achieve excellence in architectural and environmental design, as well as adhere to a high level of quality in construction and material methods toward reinforcing and enhancing the distinctive character of the established commercial areas.

The Urban Form and Land Use policies of the Community Plan are discussed in detail in Appendix J (refer to Tables LU-9 and LU-10, respectively), of this Draft EIR and summarized in Section 4.9, *Land Use and Planning*, of this Draft EIR.

West Adams–Baldwin Hills–Leimert Community Plan Overlay District

The West Adams–Baldwin Hills–Leimert Community Plan Overlay District CPIO (adopted April 2017 and amended August 2019) serves as the implementation tool for policies expressed in the West Adams–Baldwin Hills–Leimert Community Plan. Implementation Overlay (CPIO) District. The boundaries of the CPIO District are identical to the boundaries of the West Adams–Baldwin Hills–Leimert Community Plan Area.

The purposes of the West Adams CPIO District are as follows:

A. To provide supplemental development regulations tailored to the Community Plan Area to ensure that development enhances the unique architectural, environmental, and cultural qualities of the Community Plan Area, integrates improvements and enhancements to the public rights-of-way, and maintains compatible land uses, and appropriate development scale, intensity, and density.

B. To create approval processes, including a ministerial administrative clearance process, which enables infill development that will positively impact communities in conformance with these regulations.

C. To foster revitalization of properties along the commercial corridors and at major intersection nodes throughout the Community Plan Area.

D. To promote and facilitate revitalization of properties that can capitalize upon close proximity to the La Brea, Farmdale, La Cienega and Culver City stations along the MidCity Exposition Light Rail Transit Corridor (Expo Line).

E. To foster the industrial revitalization of properties located directly adjacent to the Harbor Subdivision Railroad right-of-way between Van Ness Avenue and West Boulevard.

F. To promote the overall health and sustainability of the community that reside, work, and recreate in the Community Plan Area.

G. To encourage a vibrant mix of uses that increases access to a greater variety of goods and services within close proximity to surrounding established residential neighborhoods, commercial corridors, and industrial employment areas. 5 (Community Plan.

H. To enhance access to both passive and active open and green space amenities and encourage physical activity by all segments of the community, particularly youth and the elderly.

I. To encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of the station area.

J. To improve the quality of life and the built environment by reducing the necessity for automobile dependence through better pedestrian orientation and conservation of prevailing neighborhood character.

K. To improve the quality of life for all those who live, work, and recreate in the Community Plan Area by promoting safe pedestrian activity, bicycle use, and better vehicular accessibility through pedestrian orientation of structures, enhanced streetscapes and urban design, as well as conservation of the neighborhood character.

L. To improve the health and welfare of the community by limiting certain uses, including those that are over concentrated or rely on a standardized development typology dominated by excessive automobile orientation.

M. To promote context sensitive pedestrian-oriented and transit-oriented projects, especially on greyfield and brownfield sites and other underutilized major intersection sites.

N. To encourage new infill development that promotes and enhances existing neighborhood character and is not dominated by excessive automobile orientation.

O. To apply land use incentives and standards to encourage restoration, adaptive reuse and other rehabilitation projects along corridors and transit-oriented districts.

P. To protect existing residential properties from incompatible development and uses.

Q. To preserve and protect neighborhood identity, including protecting both designated and undesignated historic resources, and distinctive character defining elements of the existing development.

R. To preserve viable industrial land for the emergence of innovative new “clean-tech,” “information technology,” and other “high-tech” uses.

S. To support transit-oriented business districts outside of the City Center where emerging and innovative commercial, office, and "clean-tech" uses can locate within contextually appropriate medium intensity transit hubs.

T. To facilitate through land use incentives and standards, the generation of high wage jobs and training for the community, especially within the growing "clean-tech" and "greentech" sectors.

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) regulates all aspects of building development in the City, including aesthetic aspects related to lighting. The LAMC sections that regulate lighting and that are applicable to the Project include the following:

- Chapter 1, Article 2, Section 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two foot-candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.

  1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
  2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.
  3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[8]

Citywide Design Guidelines

Adopted in 2019, the Citywide Design Guidelines (Guidelines) establishes ten guidelines and various best practices to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. The Guidelines are organized around one of three design approaches and consist of the following general design direction:

- Pedestrian-First Design
  - Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.

[8] Certain exceptions apply related to frosted light sources emitting 800 lumens or less, other sources emitting 800 lumens or more not visible to persons on other residential properties, tennis or paddle tennis courts conforming to certain standards, certain temporary decorative lights, emergency lights, agency controlled light sources, and light sources a minimum distance of 2,000 feet from residential uses.

  - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
  - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.
- 360 Degree Design
  - Guideline 4: Organize and shape projects to recognize and respect surrounding context.
  - Guideline 5: Express a clear and coherent architectural idea.
  - Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
  - Guideline 7: Carefully arrange design elements and uses to protect site users.
- Climate-Adapted Design
  - Guideline 8: Protect the site's natural resources and features.
  - Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.
  - Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Guidelines apply to all new development and substantial building alterations that seek a discretionary action for which the Department of City Planning has design authority. Projects that are subject to the Guidelines will need to include as part of their application a written statement that describes how their project complies with each of the ten guidelines. Compared to the Zoning Code and other regulations governing the development of a particular property, the Guidelines are intended as a more flexible, less prescriptive means of shaping proposed projects and conveying general design expectations.

Other Los Angeles Plan

Another plan setting forth design standards applicable to properties within the City of Los Angeles includes the *Exposition Corridor Transit Neighborhood Plan.* This plan is discussed in detail in Appendix J (refer to Table LU-6) and summarized in Section 4.9, *Land Use and Planning*, of this Draft EIR.

Existing Conditions

Scenic Vistas and Scenic Resources

The Project Site is highly urbanized with existing scenic vistas consisting primarily of panoramic or broad views of the urban skyline to the north. The natural topography of the area is flat, which reduces high visibility across the community's developed sites. There are both broad and focal views available toward the Project Site. The nature of focal views compared to broad views is that the Project Site makes up a larger percentage of the view field relative to the distance between the viewer and the Project Site. The nearer the view location, the more the view field is dominated by the Project Site.

Focal views toward the Project Site, which includes both the Culver City Parcel fronting National Boulevard and Washington Boulevard and the Los Angeles Parcel fronting Venice Boulevard and National Boulevard, include views of the existing warehouse buildings and, from Venice Boulevard and Washington Boulevard, views of the historically and culturally significant Helms Bakery Building and Helms Bakery Complex to the east of the Project Site. The distinctive features of the Helms Bakery Building include the original rooftop neon signage; the Art Deco Design of the building; the trimmed hedges and shrubs along the building foundation; and, on the Washington Boulevard frontage, awnings and a variety of flags and banners on the building and fixed to light poles. The Helms Bakery Complex signs contribute to visual interest to the adjacent Venice Boulevard and Washington Boulevard and serve, in themselves, as scenic resources. The Project Site contains a total of 19 trees, including 10 street trees along Venice and National Boulevards[9] and a deep landscaped setback along Venice Boulevard, with benches and sod (grass). Venice Boulevard, a separated highway, also incorporates a landscaped median planted with sod (grass).

Distant or broad views of high-rise clusters along Los Angeles' highly urbanized streets, views of the Santa Monica Mountains to the north, and views of the Baldwin Hills to the south are available through some north- and south-facing street corridors. No designated scenic highways or roads are located within the Project area.

Aesthetic Character of the Project Site and Surrounding Area

Aesthetic Character of the Project Site

As discussed in Chapter 2, *Project Description*, of this Draft EIR, the Project Site, which includes both the Culver City Parcel and the Los Angeles Parcel, is currently improved with single-story warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. Landscaping on the Project Site is limited to parking medians, street edge, and building perimeter planting. The Project Site does not contain any free-standing signs, or illuminated signs, or signs attached to the building walls.

The low-rise warehouse buildings on the Project Site use, with heights ranging from approximately 13 to 30 feet have been converted into retail and office uses. Vehicular access to the entire Project Site is provided via a driveway on the Culver City Parcel located at the signalized intersection of National Boulevard and Ivy Station and provides direct access to an 80-space surface parking lot that serves the retail and office uses on the Project Site. Metered on-street parking is also provided along the Venice Boulevard frontage. The Venice Boulevard frontage includes an approximately 19-foot public right-of-way, containing a bus shelter and bench, waste receptacles, decorated benches, sod (grass), and seven African sumac trees. Four standard streetlights are also located along this frontage. Pedestrian access is provided along the western edge on National Boulevard and via the northern edge of the site along Venice Boulevard. The National Boulevard frontage contains a 3-foot landscaped parkway and 4-foot sidewalk and three crepe myrtle trees within the public right-of-way.

[9] While a total of nineteen (19) trees were identified by the Street Tree Report, nine (9) trees occur beyond the sidewalk and parkway area along National Boulevard, and are not street trees regulated by the City of Culver City or City of Los Angeles.

The existing 86,226 sf building on the Los Angeles Parcel presents an approximately 20-foot-high, 425-foot-long building wall from east to west along Venice Boulevard. The Culver City Parcel contains a single-story building located adjacent to an alleyway (referred to herein as the Helms alley) and directly across from the Helms Bakery Building. The Culver City Parcel also contains an additional single-story building located along National Boulevard.

The intersections adjacent to the Project Site, including National Boulevard/Venice Boulevard, National Boulevard/ Ivy Station, and National Boulevard/Washington Boulevard, are all signalized with well-marked pedestrian crossings. Sidewalks are located along the Project Site's three street frontages (Venice, National, and Washington Boulevards). High-tension lines and poles are located at the intersection of National Boulevard and Venice Boulevard and at the intersection of Helms alley at the east edge of the Project Site and Venice Boulevard.

The Project Site is generally flat with a gradual slope from north to south. Landscaping on the Project Site is provided at parking medians and the edges of the larger existing building on the Los Angeles Parcel and the smaller building on the Culver City Parcel fronting National Boulevard. Landscaping is also provided along the Project Site's Venice Boulevard and National Boulevard sidewalks. The sidewalk on Washington Boulevard fronting the second building in the Culver City Parcel (8771 Washington Boulevard) is not landscaped.

Aesthetic Character of the Surrounding Area

Area to the North of the Project Site

Venice Boulevard in the Project vicinity a divided highway with some areas of planted median. Land uses to the north of the Project Site along the north edge of Venice Boulevard, east of National Boulevard, include an older two-story office building that provides professional services. A commercial strip continues along the Venice Boulevard frontage from west of National Boulevard to Helms Avenue. However, residential uses, or residential uses converted to part commercial uses are located in the commercially zoned strip on the north side of Venice Boulevard between Curtis Avenue and Ivy Street. Single-family neighborhoods are located to the north of Venice Boulevard, east of the light industrial uses that front National Boulevard. The north side of Venice Boulevard (west of Ivy Street) is characterized by businesses or larger surface parking lots. The surface parking lots are located between the Venice Boulevard frontage and the residential neighborhoods to the north. Free standing signs are located at the street-edge corner of the two-story office building to the east of National Boulevard. No other free-standing signs or rooftop billboards are visible along the street front to the east of National Boulevard. No on-street parking is provided on Venice Boulevard between National Boulevard and Curtis Avenue (one block to the east). Sidewalks to the east of National Boulevard are landscaped with small trees and sod (grass) in poor condition. Taller streetlights are present to the east of National Boulevard.

Multiple-strand (approximately 27 lines) high-tension power lines and poles are located along the north side of Venice Boulevard. No on-street parking is provided along the Goodwill Store parking lot frontage on Venice Boulevard. However unmetered parking is provided along Venice Boulevard to the south and adjacent to the Goodwill retail center buildings. Except for the Goodwill retail center frontage, with an in-sidewalk sheltered bus stop, parkways abutting the sidewalks to the west of National Boulevard are landscaped with sod (grass) in good condition. Several pedestrian lights

are present along this frontage to the west of National Boulevard, interspersed with taller streetlights. Venice Boulevard crosses under the Expo Light Rail Line two blocks to the west of National Boulevard at Robertson Boulevard.

National Boulevard to the north of Venice Boulevard is developed with older, light industrial buildings. The land uses in this area are primarily automobile service establishments with several steel fenced parking lots. As well as the single-story automotive businesses, this area is characterized by free standing signs (billboards), and above grade utility lines. There is parking on both sides of the National Boulevard right-of-way, and the sidewalks on both sides of National Boulevard extend to the street edges. No landscaping or streetscape is provided along any of the sidewalks in this area. In addition, industrial uses are located within a several-block area to the west of National Boulevard. National Boulevard crosses under the I-10 Freeway one block to the north of the Project Site.

The built environment to the west of National Boulevard and north of Venice Boulevard includes a Goodwill store and other retail uses and services. The Goodwill store and other businesses are served by larger, surface parking lots facing the street. Freestanding signs are also present in the Goodwill parking lot to the west of National Boulevard, as well as several rooftop billboards along Venice Boulevard for several blocks to the west of National Boulevard.

Area to the East of the Project Site

The Helms Bakery Complex is located to the east of the Project Site, to the east of the Helms alley. The Helms Bakery Complex is known for its Art Deco architecture and association with the region's commercial history. The buildings within the Helms Bakery Complex have been repurposed into restaurants and furniture/décor shops and other retail uses. The Helms Bakery Building, which is located between the Helms alley and Helms Avenue, retains its historical rooftop neon sign, company flag, chimneys, and articulated building heights as viewed from Venice Boulevard. The Helms Bakery Building is approximately 495 feet in length. The sidewalks along Venice Boulevard are approximately 28 feet in depth at the Helms Bakery Building and the parkways are landscaped with sod (grass). A landscaped planter with shrubbery is located in front of the Helms Bakery Building.

Area to the West of the Project Site

The Ivy Station mixed use development is located west of the Project Site across National Boulevard. Ivy Station is bounded by National Boulevard, Venice Boulevard, and the elevated Expo Light Rail Line, and includes five- to seven-story buildings with residential, office, retail, restaurant, and boutique hotel uses. The development also includes a large central open space and provides immediate access to the adjacent Expo Light Rail Station. Ivy Station along Venice Boulevard includes a single, modern five-story building with an approximately 595-foot-long frontage wall. This building extends from National Boulevard to the Expo Light Rail Line at Robertson Boulevard to the west, with building entrances and parking structure entrance facing Venice Boulevard. The building wall features intermittent, short step-back features (parallel to the street) with a deeper step-back at the fifth floor. Paved setbacks are also provided at the corners of Venice Boulevard/National Boulevard and Venice Boulevard/Robertson Boulevard. The Ivy

Station mixed use development includes concrete sidewalk of varying widths up to a maximum of 20 feet, with intermittent abutting sod (grass) landscaping.

To the west of the Project Site, Washington Boulevard continues west under the elevated Expo Light Rail line into a regional commercial district characterized by mixed use, commercial, offices and the higher density development of Culver City's Downtown District. Much of the development along Washington Boulevard in this area is multi-story and highly urbanized in character.

Area to the South of the Project Site – Washington Boulevard

Development along the north side of Washington Boulevard, to the east of National Boulevard, include the 8777 Washington Building, a four-story office building at the north side of Washington Boulevard. The 8777 Washington Building features a primarily glass façade with an approximately 300-foot-long building wall. The southwest corner of the building creates a broad radius at the intersection with National Boulevard, which adds architectural distinction and modernity to the structure. The site provides approximately 15-foot-deep sidewalks with abutting landscaping, including street trees at the street edge. The Helms Bakery Building, which extends through the block between Washington Boulevard and Venice Boulevard, is located to the east of the Helms alley, east of the Project Site's 8771 Washington Boulevard building. This frontage also features the rooftop neon company sign, the company identification sign "Helms Olympic Bakery" over the main entrance, awnings, and the same articulated building heights and Art Deco treatment as the Venice Boulevard frontage. In addition, the street front includes Arts District Flags and wayfinding signage affixed to light poles, flags at driveway entrances, and additional landscaping, including sculpted hedges and shrubs at pedestrian and vehicle entrances and along the base of the building and street trees, including intermittent fan palms and shade trees along the street edge. The sidewalk rights-of-way range from approximately 10 feet to 15 feet.

The five-story Access Culver City mixed-use development is located at the south side of Washington Boulevard just east of National Boulevard (directly to the south of the 8777 Washington building). This mixed-use development includes multi-family housing on the second through fifth floors, and street level co-op grocery store, bank, fitness and spa uses. Driveways and commercial uses are located on Washington Boulevard and Wesley Street, which intersects with Washington Boulevard directly across from the Project Site's existing 8771 Washington Boulevard building. The Access Culver City development provides a publicly accessible plaza with outdoor seating, and landscaping at the corner of Washington Boulevard and National Boulevard. The development is highly articulated with a variety of wall step-backs, a landscaped central courtyard with recreational facilities, and variable building heights.

Creative office/commercial buildings and lots directly to the south of the Helms Bakery Complex, between Wesley Avenue and Helms Avenue, are located to the east of the Access Culver City Development. These buildings interface single-family neighborhoods fronting Helms Avenue, creating a juxtaposition between larger scale commercial/office uses and residential neighborhoods, which occurs in many areas of Culver City.

To the south of Washington Boulevard, National Boulevard also crosses under the Expo Light Rail Line. After crossing under the elevated Rail Line, National Boulevard converts into a divided

highway lined with office buildings, light manufacturing buildings, and the Turning Point School along its west edge. A multi-family neighborhood is located to the east of the Light Rail Line and National Boulevard.

Light and Glare

The Project Site is located in an urbanized setting characterized by high ambient nighttime illumination levels, particularly along Venice Boulevard, National Boulevard, and Washington Boulevard, which are developed with commercial, office, mixed uses, and some industrial uses. Light sources in the Project vicinity include streetlights, pedestrian lights, and stoplights, building security and architectural lighting, surface parking lot lights, illuminated signage, and interior building lighting from the new multi-story developments, such as the five-story Access Culver City development, and the five- to seven-story Ivy Station development.

Daytime glare is generally associated with sunlight reflected from buildings with large continuous expanses of highly reflective materials. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways and people working in adjacent buildings. The existing buildings that are visible from the adjacent roadways and other sensitive uses do not generate substantial glare. The majority of the larger building surfaces, such as the existing repurposed warehouse building on the Project Site, the Helms Bakery Building, the 8777 Washington Building, and the Ivy Station building on Venice Boulevard are painted in flat tones and do not include reflective materials or reflective glass. The Access Culver City development does not provide enough flat building surface to generate substantial glare. In addition, taller buildings that are viewed at an angle between a driver and the sun have the potential to generate glare. Because the area's buildings are low- to mid-rise, glare does not emanate from this source. Therefore, under existing conditions, there are no notable sources of daytime glare from or around the Project Site.

Nighttime glare is associated with the degree of contrast occurring between the darkened environment and the light source, or the direct visibility of the light source. In the Project area sources of nighttime glare include streetlights, parking lot lighting, and car headlights. Most streetlights and parking lot lights are directed onto the surface intended to be illuminated and are not a significant source of glare. The most notable source of nighttime glare from the Project Site and area is the movement of motor vehicles on public streets or from surface parking lots, such as the Project's parking lot off National Boulevard. However, in the current urban setting, vehicle headlights would be set primarily at "low beam," in which the light source is also directed to the roadway. As such, under existing conditions, there are no notable sources of nighttime glare from or around the Project Site.

Shading can occur when shade-sensitive uses are located to the north, northwest, or northeast of a tall building. Shade sensitive uses north of the Project Site include the yards or patios of residential uses to the north of Venice Boulevard. These are located approximately 150 feet to the north of the Project Site at the nearest point. The Project Site is not immediately adjacent to any shade sensitive uses, including residential yards, outdoor dining areas, or parks. The tallest existing building on the Project Site is 30 feet, which does not create shadows across Venice Boulevard or reach the

residential yards located to the north of Venice Boulevard. As such, there are no existing, substantial shading conditions from the Project Site.

4.1.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to aesthetics if it would:

- **AES-1**: Have a substantial adverse effect on a scenic vista;
- **AES-2**: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- **AES-3**: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,
- **AES-4**: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

For this analysis, the Appendix G Thresholds are relied upon. However, as discussed below, because the Project qualifies for exemption of significant impact findings under SB 743 (i.e., employment center projects on an infill site within a Transit Priority Area (TPA) shall not be considered a significant impact), no findings of significance are provided in this section. Nonetheless, the Project is compared to the respective thresholds herein for information disclosure purposes only.

Methodology

As described in the regulatory section above, the Project is an employment center project on an infill site within a TPA. Therefore, pursuant to PRC Section 21099(d)(1) (applicable to the entire Project Site) and ZI No. 2452 (applicable to the Los Angeles Parcel), aesthetic impacts on the environment, other than those related to historical resources, and consistency with regulations that govern scenic quality, are not considered significant. Furthermore, pursuant to CEQA Guidelines Appendix G, Aesthetics question AES-3, evaluation of a project's visual character and quality effects, other than consistency with relevant regulations, is not required in urban areas. Accordingly, the analysis of scenic vistas, scenic resources, visual character and quality, and light and glare is provided herein for informational purposes only. Note that visual character and quality is evaluated through a discussion of regulations that govern scenic quality (see Threshold AES-3, above). The aesthetic impact analysis in this Draft EIR is included to discuss the aesthetic effects that would occur from the Project if PRC Section 21099(d) were not in effect. The Project consists of development of both the Culver City Parcel and the Los Angeles Parcel. The Culver City Parcel is located in the southern portion of the Project Site and fronts Washington and National Boulevards, and the Los Angeles Parcel is located in the northern portion of the Project Site and fronts Venice and National Boulevards. As such, nothing in the aesthetic impact discussion in this

Draft EIR shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

Scenic Vistas

The analysis of scenic vistas includes a qualitative analysis of whether the Project would block views of valued visual resources and scenic vistas from public vantage points in the Project area. For purposes of this analysis, when analyzing aesthetic impacts, views generally refer to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Panoramic" views are considered vistas and provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic vistas are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views and vistas might include an urban skyline or mountain range. "Focal views" focus on a particular object, scene, setting, or feature of visual interest. Examples of focal views include public art/signs and notable buildings and structures.

Existing views across the Project Site and surrounding area, discussed below, are based on field observations from surrounding public streets. Although views from representative vantage points are discussed for informational purposes, the degree of impact relative to the threshold applies to views from public vantage points. As such, an office building or private residence would not be considered a viewing location for the purposes of assessing aesthetic impacts, given that views of broad horizons, aesthetic structures, and other scenic resources would not be available to the public. In addition, the California courts have routinely held that "obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact."[10] Analysis of views is based on a review of the region's topography to determine gradients in the area, including regional hills that have views across the Project Site and driving on streets surrounding the Project Site to assess existing views across the existing site and buildings. Nonetheless, as discussed above, scenic vista impacts associated within a TPA are not considered significant under PRC Section 21099(b)(1) and ZI No. 2452.

Scenic Resources

The evaluation of scenic resources is focused on whether identified scenic resources on the Project Site or within the vicinity of the Project would be substantially directly or indirectly damaged by the Project. The only scenic resources occurring within the Project Site consist of landscaping within the parking area and existing street trees. Scenic resources in proximity to the Project Site are the Helms Bakery Building and the Helms Bakery Complex. No other scenic resources on-site or in the Project vicinity would be affected or potentially affected by the development of the Project. As previously discussed, scenic resources impacts within a TPA are not considered significant under PRC Section 21099(b)(1) and ZI No. 2452. The potential impacts on historic resources, as a result of changes in visual character and views, are further evaluated in Section 4.3, *Cultural Resources*, of this Draft EIR.

[10] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App. 4th 249, 279 (2006).

Regulations Governing Scenic Quality

The Project is considered for consistency with regulations that govern scenic quality, including Culver City General Plan, Culver City Urban Forest Master Plan, the CCMC, the CPIO, and other plans as applicable. These include requirements for street trees, building setbacks, building heights, exterior lighting and signage. The CEQA Guidelines provides that projects in urbanized areas need not evaluate visual character and quality, but must show consistency with zoning and regulations that govern scenic quality, such as standards set forth in Community Plans, the Planning and Zoning Code, and other regulatory documents. In addition, visual quality impacts within a TPA are not considered significant under PRC Section 21099(b)(1) and ZI No. 2452. The potential impacts on historic resources, as a result of changes in visual character and views, are further evaluated in Section 4.3, *Cultural Resources*, of this Draft EIR.

Light and Glare

The analysis of light and glare describes the existing light and glare environments in the Project area, identifies the light- and glare-sensitive land uses in the area, describes the light and glare sources under the Project, and qualitatively evaluates whether the Project would result in a substantial increase in nighttime lighting and daytime glare as seen from the area's sensitive uses. The analysis of lighting impacts focuses on whether the Project would cause or substantially increase adverse nighttime lighting effects on light sensitive uses. Included in this analysis is consideration of the affected street frontages, the direction in which Project lighting would be directed, the potential for sunlight to reflect off the exterior surfaces of the proposed buildings, and the extent to which glare would interfere with the operation of motor vehicles or other activities.

In addition, an assessment of the Project's shading impacts on shade sensitive receptors is provided for informational purposes. Facilities and operations sensitive to the effects of shading include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to their function, physical comfort, or commerce.

Light and glare impacts, as well as shading impacts within a TPA are not considered significant under PRC Section 21099(d)(1).

Project Design Features

The following project design features related to aesthetics will be implemented as part of the Project:

> **AES-PDF-1: Construction Fencing.** Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are

maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

AES-PDF-2: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.

AES-PDF-3: Glare. Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit.

AES-PDF-4: Lighting. Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent or nearby uses.

Analysis of Project Impacts

Threshold AES-1: Would the Project have a substantial adverse effect on a scenic vista?

Impact Analysis

The construction and operation of the Project would introduce above grade structures that would affect existing direct views across the Project Site. These include cranes, buildings under construction, construction fencing and the new buildings themselves, rising to 56 feet (approximately 66.5 feet to the rooftop appurtenances) in the Culver City Parcel and rising to 75 feet (approximately 81 feet to the rooftop appurtenances) in the Los Angeles Parcel. Construction activities would be fenced during construction to reduce dust, noise, and other effects, as well as views of the Project Site. Project Design Feature AES-PDF-1 would ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (e.g., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

The topography of the Project Site and the immediately surrounding area is flat, and there are no notable views of distant scenic resources across the Project Site, such as high-rise clusters in the City of Los Angeles, the Baldwin Hills, or the Santa Monica Mountains. There are no areas of high topographic relief in Culver City that would have views across the Project Site. Because of the current development within the Project Site, with buildings ranging in heights from 13 to 30 feet, no appreciable scenic views are available across the Project Site of nearby scenic resources, such as the Helms Bakery Building from the adjacent streets and sidewalks. The primary facades of the Helms Bakery Building, known for its Art Deco architecture and historic association with the community, front on and are visible from adjacent streets and sidewalk locations along Venice Boulevard and Washington Boulevard that are not blocked by existing development within the

Project Site. As discussed in Section 4.3, *Cultural Resources*, of this Draft EIR, the Helms Bakery Building and District have minimal views of the Project Site or views across the Project Site. The west elevation of the Helms Bakery Building that is separated from the Project Site by a wide alley is obscured from direct view by buildings on the Project Site, except from the Helms alley, and this façade is mostly plain and unornamented. The Helms alley is used for loading and is windowless, with the primary exception being the southern end of the elevation near Washington Boulevard, which has windows and some decorative details. As such, the Project would not block primary views from the Helms Bakery Building or District as the west façade of the building is already obstructed by development. The Project's removal of the existing 8771 Washington building on the Project Site adjacent to the 8777 Washington building, would open up new views on the portion of the Helms Bakery Building west elevation that includes windows and decorative details, thereby increasing the visibility of the Helms Bakery Building along Washington Boulevard. In the absence of existing scenic views across the Project Site, the Project would not block or have an adverse effect on a scenic vista.

Based on the above, the Project would not have a substantial adverse effect on scenic vistas. Furthermore, pursuant to PRC Section SB 743 (PRC Section 21099) (applicable to the entire Project Site) and City of Los Angeles's ZI No. 2452 (applicable to the Los Angeles Parcel, scenic resources impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment.

Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743 (PRC Section 21099) and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452.

Threshold AES-2: Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Analysis

The Project Site is within a highly urbanized area, thus, it is not located near any natural scenic resources, such as stands of trees or rock outcroppings. The Project would remove 19 streets trees,[11] which have value as scenic resources within the public right-of-way. For any street tree removed in the City of Culver City, the Project would comply with the City's TOD Streetscape Plan and

[11] While a total of nineteen (19) street trees were identified by the Street Tree Report, nine (9) trees occur beyond the sidewalk and parkway area along National Boulevard, and are not regulated by the City of Culver City or City of Los Angeles.

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.

The Project would provide streetscape improvements, including a double row (colonnade) of trees along Venice Boulevard's 29-foot-deep public right-of-way. The Project would provide 15 feet along National Boulevard for a 7-foot-deep, landscaped parkway and 8-foot sidewalk. Based on jurisdictional requirements (Culver City/City of Los Angeles), six street trees would be planted along Building 1 frontage on National Boulevard and 28 street trees would be planted along Building 2 frontages on Venice and National Boulevards (City of Los Angeles). Street trees could consist of *Platanus x Acerifolia* (London Plane) along Venice Boulevard and *Lagerstroemia indica* 'Natchez' (Crape Myrtle) along National Boulevard. Accent trees at building entrances could be *Ulmus parviflora* (Chinese elm).

No scenic highways are in proximity to the Project Site. There are no State Scenic Highways within the City of Culver City. The nearest State Scenic Highway within the City of Los Angeles to the Project Site includes portions of the Topanga Canyon State Scenic Highway (SR-27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park, and is over 11 miles to the northwest of the Project Site. There are eligible State Scenic Highway sections of SR-1 in Los Angeles and Santa Monica to the west, with nearest segment approximately 4.5 miles from the Project Site.[12] Neither of these highways or more distant scenic highways are within the Project Site's view field.

The Project Site is located adjacent to the Helms Bakery Building, an historic building within the Helms Bakery Complex, a district extending to the east of Helms Avenue. Because of this proximity, the Project has the potential to affect the historic building or the historical context of the District. As evaluated in the Section 4.3, *Cultural Resources*, of this Draft EIR, the Project's design and materials, with its simplicity of lines and natural tones and glazing, would be distinctive from, yet compatible with, the Helms Bakery Building and Helms Bakery Complex and would not detract from the architectural features and views of the building. As shown in Figure 2-3, *Conceptual Site Plan*, in Chapter 2, *Project Description*, of this Draft EIR, Building 2 is nearest to the Helms Bakery Building, which would front Venice Boulevard and be separated from the Helms Bakery Building by the existing Helms alley. The finished Building 2 would be located 55 feet from the Helms Bakery Building. The sidewalk area along Venice Boulevard would be increased to 28 feet, which would move Building 2 back from the street edge compared to existing conditions and open views

[12] California Department of Transportation, California State Scenic Highway System Map – ArcGIS Online, https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 6, 2022.

of the Helms Bakery Building to eastbound vehicles and pedestrians along Venice Boulevard. The Project would remove the existing on-site building along its Washington Boulevard frontage (8771 Washington) and replace this site with 7,120 square feet (sf) of landscaped, publicly accessible, privately maintained amenity area. The landscaped amenity area would further open views of the Helms Bakery Building's detailed Washington Boulevard frontage to eastbound pedestrians and vehicles on Washington Boulevard.

The primary facades of the Helms Bakery Building along Venice and Washington Boulevards, and all of its signage and landscape features would remain visible within the existing built environment following development of the Project. The Project landscaping, including landscaping within the amenity area on the Washington Boulevard frontage and the colonnade of trees and pedestrian-oriented flower beds on Venice Boulevard, would enhance the character of the existing background views of the Helm's Bakery District from the surrounding streets and sidewalks and, thus, would not affect the Helms Bakery Complex's integrity of setting. The existing development, thus, does not contribute to the setting of the Helms Bakery Complex. Therefore, the proposed demolition of existing on-site buildings would not have a substantial adverse effect on a scenic resource within the Project Site or the setting of the Helms Bakery Building or Helms Bakery Complex.

Based on the above, the Project would not substantially damage scenic resources, including the natural setting or historic buildings within a State Scenic Highway. Furthermore, pursuant to SB 743 (PRC Section 21099) and ZI No. 2452 scenic resources impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment.

Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743 (PRC Section 21099) and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452.

Threshold AES-3: In nonurbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact Analysis

The Project is located within an urbanized area and, as such, the concern of this threshold is whether the Project would conflict with regulations that govern scenic quality. Regulations governing scenic quality are summarized in Section 4.9, *Land Use and Planning*, of this Draft EIR and are evaluated individually in Appendix J of this Draft EIR. Such regulations pertinent to the Culver City Parcel

are set forth in the Culver City General Plan, the Culver City Redevelopment Plan for the Culver City Redevelopment Project, the Exposition Light Rail Transit and Station Design for Development, the Culver City TOD Visioning Plan, the Culver City Urban Forest Master Plan (evaluated only in Section 4.9, *Land Use and Planning*, of this Draft EIR), and in the CCMC. The lighting regulations set forth under the CCMC are discussed under Threshold AES-4, below. Regulations pertinent to the Los Angeles Parcel are set forth in the Framework Element, the CPIO , the Expo TNP, and the LAMC. Applicable LAMC regulations address lighting and are discussed under Threshold AES-4 (Light and Glare), below.

The development of the Culver City Parcel would not conflict with the City of Culver City General Plan's Commercial Corridors policy (Land Use Policy 6.1) to provide for streetscape improvements, including the widening of the National Boulevard sidewalk to 15 feet, and the provision of landscaping, street trees, pedestrian lighting, and a 7,120-sf publicly accessible amenity area with seating and landscaping, and programmatic uses such as a coffee kiosk or bicycle co-op that would improve the physical environment. The Culver City Parcel development would not conflict with General Plan Land Use Objective 10 (Visual Open Space) to increase visual open space through street widening, landscaping of sidewalks, and provision of a 51,600-sf internal courtyard (available to Project employees and visitors), of which 39,000 sf would be landscaped and a 7,120-sf amenity area, 3,326 sf of which would be landscaped. The Culver City Parcel development would also not conflict with Land Use Objective 11 (Urban Forest) to create a sustainable urban forest that would enhance Culver City's image and quality of life. The Project would incorporate street trees along the Venice and National Boulevard frontages and accent trees at building entrances along theses streets.

The Project would not conflict with Land Use Objective 12 (Urban Design) to ensure that new construction and streetscapes are accomplished with the highest quality of architectural and site design. As shown in renderings of the future buildings, including Figure 2-4, *Conceptual Project Rendering-Venice Boulevard Frontage Facing Southwest*; Figure 2-5, *Conceptual Project Rendering-National Boulevard Frontage Facing East*; Figure 2-6, *Conceptual Project Rendering-Southeast Corner of Venice Boulevard and National Boulevard*; and Figure 2-7, *Conceptual Project Elevations*, in Chapter 2, *Project Description*, of this Draft EIR, the Project would change the character and quality of the existing repurposed warehouse/surface parking lot site with new and fresher-appearing development. The buildings would be similar in color, tone, and architectural treatments, including the strong definition of each story with horizontal overhangs. The exterior walls of Building 1 and 2 would be primarily clear, full height glazing defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters. Full height glazing would allow for an open appearance and engage the adjacent sidewalks, while being open and transparent as viewed from a distance. The Venice Boulevard frontage also featuring outdoor terraces at each floor.

The strong horizontal definition of the overhangs would create a story-by-story articulation of the four- and five-story Building 2 and the four-story Building 1. The first story of the buildings would be separated from the sidewalks by landscape planters; however, the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while as open and transparent as viewed from a distance. As shown in Figures 2-4 and 2-5, the main entrances into Buildings 1 and

2 would be at street level, oriented to the street, and would be broad (approximately 40 feet and 144 feet wide, respectively). The entrance for Building 1 would vary in depth from 34 to 45 feet and the entrance for Building 2 would be 32 feet deep. These would be framed by a screen of horizontal slats, which would also be located at building corners. The entrance alcoves would be backed by clear glass entrance doors. The slatted screen would have a horizontal effect, which in combination with the horizontal overhangs, would further define the full height glazing, create a varied visual effect, and break up the buildings' sense of mass. The exterior overhangs and screen of horizontal slats would provide for shading and cooling of the buildings' common area interiors, as well as contributing to the visual character of the Project.

The Culver City Parcel development would also not conflict with Open Space Element Objective 3 (Passive Recreation) by providing 7,120 sf of publicly accessible, privately maintained amenity area with direct access off Washington Boulevard, where it would have ready access to visitors from surrounding land uses, pedestrians, and cyclists.

As discussed in Appendix J of this Draft EIR, the Culver City Parcel development would not conflict with Redevelopment Plan Section 363 (Development Standards) to restrict the building height to 56 feet, as well as conform to land coverage, setbacks, design criteria of other elements of the General Plan. The Culver City Parcel development would not conflict with the Exposition Light Rail Transit and Station Design for Development Plan standards with respect to development intensity in proximity to a Light Rail Station (Development Standard B); building heights (Development Standard C); building setbacks (Development Standard D); public open space (Development Standard E); architectural design that is permanent, pleasant, and pedestrian-oriented (faces the public street) (Development Standard H); lighting that also responds to the form of the space and the people who are likely to use it and the patterns of movement that emanate from it (Development Standard I) and provision of public art or in-lieu fees for public art (Development Standard K).

As discussed in Section 4.9, *Land Use and Planning*, of this Draft EIR, the Culver City Parcel development would not conflict with the policies of the Urban Forest Master Plan (UFMP). The Project would provide 7,120 sf of publicly accessible, privately maintained amenity area along its street front. In addition, the Project's streetscape program would meet or exceed the 2:1 replacement requirement for existing street trees. The selected street tree species would meet the UFMP Tree Palette as meeting the UFMP's performance criteria. The Culver City Parcel's publicly accessible, privately maintained amenity area, which would be directly accessible from the Washington Boulevard sidewalk, would provide landscaping, seating, and other amenities.

Under CCMC Section 17.230.020, Table 2-9, building setback requirements for Industrial General (IG) zone and parcels within the East Washington (EW) overlay are 5 feet at the front yard (which would be both National Boulevard and Washington Boulevard) with no side yard or rear yard building setback requirements. With the provision of 7,120 sf of landscaped, publicly accessible, privately maintained amenity area along Washington Boulevard (with public amenities) and widened sidewalks and setbacks along National Boulevard, the Project would be consistent with the current setback criterion. Under CCMC Section 17.260.035 (Building Heights), buildings on IG parcels, if not located adjacent to or across an alley from a residentially zoned property, have

no prescribed building height limits. However, the Culver City Parcel development would be constrained to a building height of 56 feet under the Redevelopment Plan and under the PD zone in accordance with CCMC Section 17.240.015.

In order to provide a unified development, the Project is seeking to redevelop the Project Site under the PD zone. CCMC Sections 17.240.010 and 17.240.015 describe the purpose and requirements of the PD Zoning District as allowing large scale commercial complexes within a physically integrated and contiguous area. Within the PD zone, no building may exceed 56 feet in height, and all utilities within the limits of a PD zone must be located underground. Building 1 within the Culver City Parcel would be 56 feet in height and have a rooftop parapet wall reaching an additional 10.5 feet. The Project would locate utilities underground and would limit the building in the Culver City Parcel to 56 feet and would thus meet the CCMC's PD zone requirements related to underground utilities and building height.

CCMC Section 17.300.035.C.1 requires the screening of utilities, including mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts), loading docks, refuse and recyclable materials storage areas, and utility services, from public view from adjoining public streets and rights-of-way. CCMC Section 17.300.035.C.2 requires the method of screening to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Director. The Culver City Parcel development (Building 1) would screen all utilities from public view. Any utilities located on the building roof would be screened by fencing, the design of which would be coordinated with the building's architectural materials, color, and design. This regulation would be further implemented for Buildings 1 and 2 under Project Design Feature AES-PDF-2, which requires mechanical, electrical, and roof top equipment [including heating, ventilation, and air conditioning (HVAC) systems], as well as building appurtenances, to be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way. Plans related to rooftop screening would be submitted to the Director of Planning for review. Other utility areas, such as refuse and recyclable storage loading areas would be located in the subterranean garage and would not be visible from the public streets and highways.

CCMC Section 15.06.100.A (Art in Public Places) requires the inclusion of visual artwork, performing and architectural resources to enhance the quality of life for individuals living in, working in, and visiting the City. The Project would feature high quality architecture, distinguished by glass walls with a street-facing orientation; street-accessible and inviting main entrances; coordinated use of building materials and structural design of the two office buildings; and moderate color palette with overhangs and a screen of horizontal) framing main entrances and building corners, thus, resulting in distinctive and creative building exteriors. The Project would also provide in lieu fees for public art. With compliance with CCMC regulations that govern scenic character, such as building heights, setbacks, and screening, the Project would not conflict with the policies of the CCMC that regulate scenic quality.

As specifically evaluated in the tables in Appendix J of this Draft EIR, development of the Los Angeles Parcel would not conflict with policies of the Framework Element, including policies of the Framework Element's Land Use chapter to provide for the siting and design of new

development that maintains the prevailing scale and character of the City's commercial and industrial districts. The Los Angeles Parcel development would not conflict with policies of the Framework Element's Urban Form and Neighborhood Chapter to provide for common areas, adequate lighting, clear definition of outdoor spaces, and use of landscaping as a natural barrier, nor would the Project, through its provision of the Venice Boulevard colonnade and 7,120 sf of landscaped, publicly accessible, privately maintained amenity area, conflict with policies of the Open Space and Conservation Chapter of the Framework Element to maximize the use of the City's existing open space network. The Project would not conflict with policies of the General Plan Conservation Element to protect irreplaceable resources for the aesthetic enjoyment of present and future generations.

The development of the Los Angeles Parcel with a 75-foot-high building at a 55-foot distance from the Helms Bakery Building (wall to wall) would not conflict with the development standards of the CPIO related to building height. In addition, the Project would also not conflict with CPIO requirements related to building disposition (lot coverage of more than 50 percent), building design, building façade articulation, and the pedestrian-oriented ground floor policies of the CPIO. However, the Project is seeking an amendment to the CPIO, as discussed in Chapter 2, Subsection 2.8, *Anticipated Project Approvals*, to clarify that outdoor balconies are not considered to be floor area. With the requested amendment, , the Project would not count the balcony space or conflict with the CPIO's intensity and density requirements. The Project is also seeking an exception from the CPIO's setback requirements from the Helms Bakery Building to allow more flexibility with building design. With the approval of these CPIO amendments, the Project would not conflict with the CPIO.

Based on the above, the Project would not conflict with zoning and other regulations governing scenic quality. Furthermore, pursuant to SB 743 (PRC Section 21099) and ZI No. 2452 visual quality impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment.

Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743 (PRC Section 21099) and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452.

Threshold AES-4: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Analysis

Nighttime Lighting

The development of the Project would generate new sources of short-term lighting during the construction phase and new sources of lighting during the operation of the Project. However, the Project area is an urbanized setting characterized by a high level of nighttime lighting. Construction activities are anticipated to take place during daylight hours, and construction-related nighttime lighting would be used at the construction site only for safety and security purposes. Construction lighting will be shielded, directed downward, and as required by Project Design Feature AES-PDF-4 to avoid undue glare or light trespass onto adjacent uses. In addition, eight-foot-tall security fencing will be provided around the construction site as required by Project Design Feature AES-PDF-1, which will block ground-level views of the construction site and reduce light spillover onto adjacent properties. Finally, Project construction lighting would be intermittent during certain stages of the construction period. As such, the Project would not create a new source of light or glare during construction which would adversely affect day or nighttime views in the area.

New lighting associated with operation of the Project would be in keeping with the general nature of modern office buildings. Lighting would include architectural lighting, landscape lighting, and pedestrian lights for security and wayfinding. As a building with a primarily glass façade, evening lights would emanate from the common area building interior. Pedestrian and security lighting would also be provided within the publicly accessible, privately maintained amenity area. New lighting would be shielded and directed on the Project Site and placed in a manner that would minimize sky-glow and light trespass onto the adjacent Helms Bakery Building or mixed-residential uses, including residential development in the area. New building lighting, such as architectural lighting, would be in character with existing building lighting in the area as seen from Venice Boulevard, National Boulevard, and Washington Boulevard. The nearest residential uses are located within the Ivy Station development located to the west of National Boulevard directly across from the Project Site and the Access Culver City development to the south of Washington Boulevard. Direct light between the Project Site and the Access Culver City development would be largely blocked by the 8777 Washington office building, located to the south of the Project's Building 1. Nearby residential neighborhoods also include a neighborhood to the north of Venice Boulevard, to the north of the strip commercial uses along the north side of that street and located between the Project Site and the residential neighborhood. This residential area is located approximately 270 feet to the north of the Project Site. With intervening existing commercial uses and the high ambient light generated by existing streetlights along Venice Boulevard, ambient light changes in this neighborhood are not anticipated. The other nearest residential neighborhood is located to the south of Washington Boulevard to the east of Wesley Street along Helms Avenue, generally east and south of creative office/commercial buildings along Washington Boulevard. Ambient light generated by the Project to the residential neighborhood to the south would be generally blocked by the intervening buildings.

Existing regulations related to the interface of commercial uses with residential uses would also reduce the effects of ambient light changes. CCMC Section 17.300.040 (Outdoor Lighting), applicable and enforceable relative to the Culver City Parcel, requires that all lighting fixtures be architecturally integrated with the character of the structure. Section 17.300 requires that all lighting be shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site. In addition, this section requires that lighting be directed downward and away from adjoining properties and public rights-of-way. Permanently installed lighting is not permitted to blink, flash, or be of unusually high intensity or brightness and timers, where acceptable, are used to turn off lights during hours when they are not needed. Uniformity or compatibility of lighting type (e.g., height, wattage, energy efficiency, base support, finish material, texture, color and style of poles and luminaires) is required. Lighting for landscaping and pedestrian walkways are low profile and any freestanding light poles and luminaires do not exceed a maximum height of 18 feet. The purpose of this regulation is to mitigate any impacts to adjoining properties. Security lighting is provided at all entrances/exits, except in a residential zone.

Relative to the Los Angeles Parcel, LAMC Section 14.4.4 E requires that no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property, which would apply to the Ivy Station mixed use located directly across National Boulevard from the Project Site.[13] LAMC Section 17.08 C. requires that plans for street lighting be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

Furthermore, to ensure the shielding of all exterior lighting, Project Design Feature AES-PDF-4 (Lighting) requires construction and operational lighting to be shielded and directed downward (or on the specific on-site feature to be lit) to avoid undue glare or light trespass onto adjacent or nearby uses. Project Design Feature AES-PDF-4 would be applicable to all adjacent uses, including the Helms Bakery Building. Overall, with the implementation of the applicable regulations and Project Design Feature AES-PDF-4, the construction and operation of the Project would not create a new source of substantial light that would adversely impact nighttime views in the area.

Nighttime Glare

Glare occurs when the light source is directly visible at a sensitive receptor, such as a residential use, residential balcony, or motorist. With the increase in occupancy and vehicles entering and exiting the Project's driveways, glare could occur if a vehicle's headlamps are directed at and illuminate any of these receptors. The Project's National Boulevard driveway is located directly across from Ivy Station's 2nd through the 5th floor residential units and balconies at the west of National Boulevard. However, although motor vehicle headlamps can generate glare because the light source is directly visible, exiting vehicles would be operated in an urban, high ambient light setting. Under these conditions, such vehicles would be operated in the "low beam" mode. Therefore, vehicle lights would be directed at the roadway and would not create an adverse glare impact on the area's residential uses or other motorists on the roadway.

[13] Ivy Station is located within a PD zone. Although not strictly a residential zone as a PD zone is specifically tailored to a specific development, the PD zone allows for residential uses and, as such, can be interpreted as residential.

Other sources of nighttime glare can be generated by commercial signage. As an office use, however, the Project would have limited signage, consisting primarily of building identification signs at the building entrances on National Boulevard and Venice Boulevard, respectively, and wayfinding signs at the driveways. The Project would not include any roof-top or advertising signs, nor would such signs be allowed under the PD zone. Any signs, such as building identification signs or a monument sign, would be integrated into the architectural design of the buildings. If illuminated, such signs would not provide a direct source of glare (visibility of the light source).

Any potential glare sources on the Culver City Parcel would be regulated under CCMC Section 17.300.040, which requires that any light resulting in glare be confined to the maximum extent feasible within the boundaries of the site and be directed downward and away from adjoining properties and public rights-of-way; permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness; landscaping and pedestrian walkway lights shall be low profile; and that freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director of Planning.

Any potential glare sources on the Los Angeles Parcel would be regulated by LAMC Section 93.0117(b), which prohibits any person to construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two foot-candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in the LAMC, is a glare resulting from high luminance or insufficiently shielded light sources that are in the field of view. The prohibited locations defined in the LAMC include: any exterior glazed window or sliding glass door on any other property containing a residential unit or units; any elevated habitable porch, deck or balcony on any other property containing a residential unit or units; and any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

With the implementation of existing CCMC and LAMC regulations and Project Design Feature AES-PDF-4, the Project would avoid undue glare or light trespass onto adjacent or nearby uses. Therefore, with the implementation of the applicable regulations and Project Design Feature AES-PDF-4, the construction and operation of the Project would not create a new source of substantial glare that would adversely affect nighttime views in the area.

Daytime Glare

Daytime glare is common in urban areas and is typically created when sun reflects off mid- to high-rise buildings with exterior façades largely or entirely composed of highly reflective glass or mirror-like materials, particularly following sunrise and prior to sunset. Glare generation is typically related to sun angles and is generally greater during the winter or times of the day when the sun is at a relatively low angle. Daytime glare can interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim.

The exterior cladding on the Project's new buildings would feature large windows and other potentially reflective materials. Building 2 would be highly visible in the view field of eastbound traffic on Venice Boulevard and both Buildings 1 and 2 would be visible from residential uses to

the west of National Boulevard. To ensure that reflected sunlight would not affect any nearby glare-sensitive uses or activities (e.g., adjacent residential uses, eastbound traffic on Venice Boulevard), Project Design Feature AES-PDF-3 requires glass used in building façades to be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). With the implementation of Project Design Feature AES-PDF-3, final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit. In addition, the overhangs would provide distinct delineation of all individual stories) and, with the screen of horizontal slats, would reduce large, flat surfaces and the potential for glare. As such, the Project's architectural features and implementation of Project Design Feature AES-PDF-3 would ensure that potential daytime glare from the building façades would not adversely affect daytime views in the area or interfere with the performance of off-site activities.

Shading

Potential shading effects could occur when shadow-sensitive uses are located to the north, northwest, or northeast of new structures. The potential for shading is highest when a shadow-sensitive uses is immediately adjacent to a new structure and decreases the further the sensitive use is located from a Project Site. Facilities and operations sensitive to the effects of shading include routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. As the sun moves from the east to the west throughout the day, shadow lengths and direction move accordingly. Shadows are longest during the winter, with the maximum length occurring during the Winter Solstice (December 22). During the spring, fall, and summer, shadow lengths are shorter than winter shadows. The maximum shadow lengths during the spring, fall, and summer are approximately 2.18 times the height of a building.[14] The Project's Building 2 would be up to 75 feet tall.[15] As such, it could cast a maximum shadow of approximately 155 feet during the spring, fall, and summer. The only shadow sensitive uses to be potentially affected by Project shadows during these times of the year are several residential properties located along Venice Boulevard between Curtis Avenue and Ivy Street. These properties are located at approximately 155 feet from the Project's Building 2. As such, Project shadows could extend near or just within the nearby residential property boundaries during the morning or evening hours. During the winter, maximum shadow lengths are approximately 3.03 times the height of a building.[16] As such, Building 2 could cast a maximum shadow of approximately 215 feet during the winter, which could extend into the central portions of these same residential properties along Venice Boulevard during the morning and afternoon.

[14] City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit A.3-1, 2006.

[15] The height of the Venice Boulevard façade, the point of Building 2's shadow measurement, would be 75 feet, Although the bulkhead would rise to a height of 81 feet, it would be substantially set back from the edges of the building and would not contribute to shadow length.

[16] City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit A.3-1, 2006.

While limited shading of these residential uses could occur, particularly during the winter, pursuant to SB 743 (PRC Section 21099) and ZI No. 2452 aesthetic impacts, including shading, of an employment center project located within a TPA shall not be considered significant impacts on the environment.

Conclusion

Based on the above, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, nor substantially interfere with the performance of off-site activities. Furthermore, pursuant to SB 743 (PRC Section 21099) and ZI No. 2452 light and glare impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment.

Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743 (PRC Section 21099) and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, of this Draft EIR, provides the list of the 52 related projects planned or are under construction in the Project study area. Of these, 34 of the related projects are located in Culver City and 18 of the related projects are located in the City of Los Angeles. The related projects are mapped in Chapter 3, Figure 3-1, *Related Projects Map,* and as shown therein are all located within a 1.5-mile radius of the Project Site. The related projects list primarily reflects infill development within existing, built out Culver City and Los Angeles communities. As such, the related projects contribute to a variety of local urban settings with varied aesthetic characteristics. The majority of the related projects are located in different viewsheds from the Project when viewed at the pedestrian level within the flatter, urban area, and thus do not allow for panoramic views of the area. From more distant locations at higher elevations, the related projects and Project would contribute cumulatively to visual changes in the area's urban composition.

Because of the area's flat terrain, the potential for the related projects to create cumulative effects in combination with the Project is generally the total contribution of new development to the changing visual character of a street corridor. Related projects located along the same street corridors as the Project include ten related projects on Washington Boulevard and the three related projects on National Boulevard. However, because of the interconnection of Washington and National Boulevards with other primary street corridors within Culver City, including Jefferson and Culver Boulevards, the numerous large scale related projects along these street corridors, in

combination with the Project would also contribute to the changing appearance of these street frontages.

Scenic Vistas

As viewed from the Baldwin Hills and other areas in the region with higher elevations, the related projects and the Project would contribute to the region's growing mid-rise and high-rise profile. This area, however, is sufficiently removed from the Baldwin Hills to not cause obstructions of views from any hillside streets, such as those in the Baldwin Hills, to create a substantial obstruction of views of the Los Angeles Basin or horizon.

With regard to focal views, important focal views include the Helms Bakery Building as viewed from Venice Boulevard and Washington Boulevard. The related projects and the Project are relatively separated and not so close together that they would block focal views of or cumulatively encroach into the view field of the Helms Bakery Building. The Project, in fact, would increase the Venice Boulevard setback to 28 feet, equivalent to the Helms Bakery Building's 29-foot setback, and improve east-facing views of the building from Venice Boulevard. The Project's proposed publicly accessible, privately maintained amenity area would also open views across the Project Site of the Helms Bakery Building from eastbound Washington Boulevard and from within the publicly accessible, privately maintained amenity area. With the Project's improved views of the Helms Bakery Building and the distance of related projects from the Project Site, any focal view blockages caused by related projects would not be cumulatively considerable.

The Project in combination with the related projects would not block notable focal views or panoramic views of the region but, instead, would constitute an addition to the region's skyline. Any distant views through street corridors or sky views would not be blocked by the development of the Project and related projects.

Therefore, the Project in combination with related projects is not anticipated to have a cumulatively substantial adverse effect on a scenic vista. Furthermore, pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452, as applicable, scenic vista impacts of a residential, residential mixed-use, or employment center project located within 0.5 miles of a transit station, as are the Project and many of the related projects, shall not be considered significant impacts on the environment. Therefore, cumulative impacts with respect to scenic vistas would be less than significant.

Scenic Resources

The Culver City and Los Angeles communities are heavily urbanized, in which most scenic resources include historic buildings or neighborhoods, or more distant skyline views. The Project, itself, would be located 55 feet from the historic Helms Bakery Building and would be developed at a scale and architectural style that would not detract from or diminish the Art Deco character of this historic, scenic resource. Other related projects near the Project Site, including Related Project No. 5 (8700 Washington Boulevard mixed-use), are not sufficiently close to the Project to share the same view field of the Helms Bakery Building. Related Project No. 5 at 8700 Washington Boulevard is located across Washington Boulevard from the Helms Bakery Complex. Because of the open street corridor and location of the Related Project No. 5 beyond the Helms Bakery

Building from the Project Site, the Project in combination with related projects would not affect the scenic value of this historic resource.

The Project and related projects would not adversely change the natural character and topography of the area. Nor would the Project and related projects block street corridors that provide for distant views of scenic resources, such as mountains, certain urban skylines, or sky views from public streets and sidewalks. No state or local scenic highways are located within the Project area and, as such, the Project and related projects would not cumulatively impact natural or aesthetic resources, including historic buildings, in the vicinity of scenic highways.

Therefore, the Project in combination with related projects is not anticipated to cumulatively cause substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. Furthermore, pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452, as applicable, scenic resources impacts of a residential, residential mixed-use, or employment center project located within 0.5 miles of a transit station, as are the Project and many of the related projects, shall not be considered significant impacts on the environment. Therefore, cumulative impacts with respect to scenic resources would be less than significant.

Regulations Governing Scenic Quality

Related projects, as with the Project, are expected to comply with regulations governing scenic quality, including CCMC and LAMC regulations regarding street trees, exterior lighting, and illuminated signage, as applicable, as well as building height, setbacks, open space, lot coverage, and landscaping requirements. Additionally, the related projects would be required, as applicable, to demonstrate compliance with other plans governing scenic quality, which may include, but are not limited to the following: Culver City General Plan, the Culver City Redevelopment Plan, the Culver City Urban Forest Master Plan, Culver City TOD Visioning Plan, the Exposition Light Rail Transit and Station Design for Development, the CPIO, the Exposition Corridor Transit Neighborhood Plan, Los Angeles Framework Element, and the Citywide Design Guidelines.

Because the Project and related projects would be required to comply with applicable policies and regulations governing scenic quality, the Project and related projects would not cumulatively conflict with policies and regulations governing scenic quality. Furthermore, pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452, as applicable, regulations governing scenic quality impacts of a residential, mixed-use residential, or employment center projects located within 0.5 miles of a transit station, as are the Project and many of the related projects, shall not be considered significant impacts on the environment. Therefore, cumulative impacts with respect to regulations governing scenic quality would be less than significant.

Light and Glare

The Culver City and Los Angeles communities are highly urbanized area with a considerable amount of commercial and industrial development, with streetlights (a high source of ambient light levels) and signage. The cumulative development occurring within the area typically includes lighting that is appropriate to the respective related projects including high- and medium-density residential uses, hotels, retail, and office (including creative office) buildings. Under CCMC

regulations, signage would also be required to be shielded and blend with the architectural character of proposed new development.

In Culver City, all new development must comply with CCMC Section 17.300.040, which requires that any light resulting in glare be confined to the maximum extent feasible within the boundaries of the site and shall be directed downward and away from adjoining properties and public rights-of-way; permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness; landscaping and pedestrian walkway lights shall be low profile; and that freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director.

In Los Angeles, all new development must comply with existing regulations such as LAMC Section 93.0117(b), which prohibits any exterior light from causing more than two foot-candles of lighting intensity or direct glare onto any residential property, and LAMC Section 14.4.4 E, which requires that no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property, the related projects would not produce glare effects on nearby sensitive uses or activities that would adversely affect nighttime views in the area.

Given that the large number of related projects are located in areas that already have relatively high levels of ambient light and, with the Project and related project's required compliance with existing CCMC and LAMC regulations pertinent to lighting and illuminated signage in the Study Area, the Project in combination with related projects is not anticipated to create a new source of substantial cumulative light or glare that would adversely affect day or nighttime views in the area. Furthermore, pursuant to SB 743 (PRC Section 21099(d)(1)) and ZI No. 2452, as applicable, light and glare impacts of a residential, mixed-use residential, or employment center project located within 0.5 miles of a transit station, as are the Project and many of the related projects, shall not be considered significant impacts on the environment. Therefore, cumulative impacts with respect to light and glare would be less than significant.

None of the related projects are sufficiently close to the Project Site or positioned in such a location to contribute to significant cumulative shading impacts to residential uses along Venice Boulevard between Curtis Avenue and Ivy Street.

Mitigation Measures

The Project is considered an employment center project and is located on an infill site within an urban transit priority area (less than 0.5 mile from a major transit station), its aesthetic impacts are less than significant under SB 743. As such, the Project would not result in significant cumulative impacts, and no mitigation measures would be required.

Level of Significance After Mitigation

Cumulative impacts regarding aesthetics would not be significant under SB 743 and no mitigation measures would be required. Therefore, the cumulative .impact level remains less than significant.

4.2 Air Quality

4.2.1 Introduction

This section evaluates the Project's potential air quality impacts, including potential cumulative impacts generated by construction and operation of the Project. This section estimates the air pollutant emissions generated by Project construction and operation and assesses whether Project emissions would conflict with or obstruct implementation of the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); result in a cumulatively considerable net increase of any criteria pollutant in non-attainment of federal or State ambient air quality standard; or, expose sensitive receptors to substantial pollutant concentrations. This section relies on the information, data, assumptions, calculation worksheets, and model outputs are provided in Appendix B of this Draft EIR.

4.2.2 Environmental Setting

Air Quality Background

Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[1] As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to federal and state air quality standards.[2] The NAAQS and CAAQS are listed in Table 4.2-1 in the *Regulatory Framework* subsection.

At the regional level, the SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.[3] Culver City and Los Angeles are located within the South Coast Air Basin (Air Basin) which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and State ambient air quality standards are achieved and

1 USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed July 8, 2022.
2 South Coast Air Quality Management District (SCAQMD), Final 2016 AQMP, 2017. Appendix I-69.
3 SCAQMD, Map of Jurisdiction, 1999.

maintained for the Air Basin. Failure to comply with these standards puts State and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD's AQMP, which incorporates regional demographic projections and integrated regional land use and transportation strategies from SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards at the federal, State, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

Local Air Quality and Air Pollution Sources

As mentioned previously, Culver City and Los Angeles are located South Coast Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino Counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack.

Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Pollutant Types

Criteria Pollutants

The six principal pollutants for which national and State criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O_3), respirable and fine particulate matter (PM10 and PM2.5, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

Ozone (O_3): Ozone is a gas that is formed when volatile organic compounds (VOCs) and NO_X - both byproducts of internal combustion engine exhaust - undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Particulate Matter (PM10 and PM2.5): Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM10 and PM2.5, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in dense urban areas, such as the City of Los Angeles and City of Culver City most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM10 and PM2.5. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Carbon Monoxide (CO): Carbon monoxide (CO) is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In dense urban areas, such as Los Angeles and Culver City where the Project is located, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Nitrogen Dioxide (NO_2) and Nitrogen Oxides (NO_X): NO_2 is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, particularly in dense urban areas, such as where the Project is located, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM10. NO_X irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

Sulfur Dioxide (SO_2): Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead (Pb): Pb is a metal found naturally in the environment as well as in manufactured products. The highest levels of Pb in air are usually found near Pb smelters. The major sources of Pb emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO_4^2), hydrogen sulfide (H_2S), visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., H_2S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., $SO_4^2$and visibility reducing particles) through other criteria pollutants. For example, $SO_4^2$are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

Sulfates (SO_4^2): SO_4^2 are the fully oxidized ionic form of sulfur. SO_4^2 occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO_4^2 in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO_4^2 are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S): H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

Visibility-Reducing Particles: Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^2, nitrates, organic carbon particles) which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[7] Exposure to

4 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed July 8, 2022.

5 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed July 8, 2022.

6 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed July 8, 2022.

7 CARB, Visibility-Reducing Particles & Health. Last reviewed April 15, 2022.

some haze-causing pollutants have been linked to adverse health impacts similar to PM10 and PM2.5, as discussed above.[8]

Vinyl Chloride: Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.[9] Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity and control methodologies applied to industrial facilities generally prevent emissions to the ambient air. There are no known sources of vinyl chloride emissions outside of occupational or industrial settings.[11]

Volatile Organic Compounds and Toxic Air Contaminants

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the Air Basin, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O_3-depleting compounds.

VOCs: VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are therefore regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings).

TACs: TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and includes both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and

8 CARB, Visibility-Reducing Particles & Health. Last reviewed April 15, 2022.

9 CARB, Visibility-Reducing Particles & Health. Last reviewed April 15, 2022.

10 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed July 8, 2022.

11 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed July 8, 2022.

stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding air quality at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
  - National Ambient Air Quality Standards (NAAQS)
- California Clean Air Act
  - California Ambient Air Quality Standards (CAAQS)
- California Code of Regulations
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program
- SCAQMD and SCAG
  - AQMP and RTP/SCS
  - SCAQMD's Air Quality Guidance Documents
  - SCAQMD's Rules and Regulations
- Culver City General Plan
- Culver City Green Building Program
- Los Angeles General Plan Air Quality Element
- Los Angeles Plan for a Healthy Los Angeles

Federal

Federal Clean Air Act

The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[12] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[13] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate

12 42 United States Code Section 7401 et seq. (1970).
13 USEPA, Clean Air Act, 1963.

how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[14]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table 4.2-1**, *Ambient Air Quality Standards*, shows the NAAQS currently in effect for each criteria air pollutant. The Air Basin fails to meet national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants.

TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM10)	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter (PM2.5)	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		

[14] USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017.

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

NOTES: ppm = parts per million by volume; µg/m3 = micrograms per cubic meter

[a] An ambient air quality standard is a concentration level expressed in either ppm or µg/m3and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.

[b] Ambient Air Quality Standards based on the 2016 AQMP.

[c] "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.

[d] California and Federal standard attainment status based on SCAQMD's 2016 AQMP and 2018 updates from CARB. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

[e] An attainment re-designation request is pending.

SOURCES: USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed July 8, 2022.
CARB, Ambient Air Quality Standards May 4, 2016.

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS, and the CAAQS for the California criteria air pollutants (discussed below), have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration

of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 4.2-1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM10, and PM2.5 and, therefore, is considered "non-attainment" for these pollutants.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-*

Fueled Engines. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

Regional

South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction, as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and PM2.5 are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[15] sufficiently to meet the upcoming O_3standard deadlines, as NO_X plays a critical role in the creation of O_3. The AQMP's strategy to meet the 8-hour O_3 standard in 2023 should lead to sufficient NO_X emission reductions to attain the 1-hour O_3 standard by 2022. Since NO_X emissions also lead to the formation of PM2.5, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of PM2.5 levels and attainment of PM2.5 standards.[16,17]

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, State and local levels and industries. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and USEPA.

The AQMP also incorporates the transportation strategy and transportation control measures from SCAG's 2016–2040 RTP/SCS Plan.[18] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and

15 NOx emissions are a precursor to the formation of both O_3 and secondary PM2.5.

16 Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

17 SCAQMD, Final 2016 AQMP, 2017, p. ES-2, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed July 8, 2022.

18 SCAG, Final 2016 RTP/SCS, 2016, https://scag.ca.gov/resources-prior-plans. Accessed July 8, 2022.

Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.[19] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP, are based on SCAG's 2016–2040 RTP/SCS.

The 2016 AQMP forecasts the 2031 emissions inventories ''with growth'' based on SCAG's 2016–2040 RTP/SCS. The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and 8 percent growth in VMT between 2012 and 2031. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state, and federal levels.[20]

On September 3, 2020, SCAG's Regional Council adopted the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS was determined to conform to the federally mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable future State GHG reduction targets of 19 percent. The 2020–2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD's Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[21] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website.[22] SCAQMD recommends using approved models to calculate emissions from land use projects, such as the CalEEMod software, which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects.

19 SCAQMD, Final 2016 AQMP, 2017, p. ES-2, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed July 8, 2022.
20 SCAQMD, Figure 1-4 of the Final 2016 AQMP.
21 SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.
22 SCAQMD, Air Quality Analysis Guidance, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#. Accessed July 8, 2022.

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[23] SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMDs guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.[24] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds*.[25] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology.*

SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to the following:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following list of rules which apply to the Project:

- **Rule 401 – Visible Emissions**: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance**: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule).

[23] SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.
[24] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).
[25] SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project:

- **Rule 1113 – Architectural Coatings**: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Local

City of Culver City

Culver City General Plan

The Culver City General Plan includes nine elements that have been updated at various points between 1968 and 2014. The current plan does not have an Air Quality Element. However, the Circulation Element (amended through 1995) contains objectives and associated policies focused on traffic flow (Objective #1), public transit (Objective #2), bikeways (Objective #3), pedestrian access (Objective #4), participating in regional system improvements (Implementation Measure #1), and roadway improvement (Implementation Measure #2).[26] Consistency with these objectives and associated policies would have the potential to reduce single occupancy vehicle trips and VMT,

[26] City of Culver City, Culver City General Plan, Circulation Element, 1995.

thus reducing air pollutants from mobile sources. The growth projections within the General Plan inform the development of SCAQMD's AQMP.

Culver City Green Building Program

In 2009, the City of Culver City adopted the Mandatory Green Building Program which contains a number of features that would indirectly reduce air pollutant emissions such as enhanced building insulation, low-flow fixtures, efficient lighting and heating, ventilation, and air conditioning (HVAC) systems.[27] The City of Culver City Mandatory Green Building Program also includes a specific feature for parking garages which requires all new lighting to be motion sensor controlled and efficient minimum base level lighting.

City of Los Angeles

Los Angeles General Plan Air Quality Element

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City of Los Angeles is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements) and the City of Los Angeles' Green New Deal (Sustainability Plan 2019) contain policies and programs for the protection of the environment and health through improved air quality. These policies and programs serve to provide additional critical guidance for the betterment of public health for the region and city.

The most directly-related of those plans, the City of Los Angeles' General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies which guide the city in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development, and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in city facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and

[27] City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

The City of Los Angeles is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, the city can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the city assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

Los Angeles Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles[28], adopted by the Los Angeles City Council on March 31, 2015, and amended in 2021, lays the foundation to create healthier communities for all residents in the city. As an element of the City of Los Angeles General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the city's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food.

Existing Conditions

Regional Air Quality

The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of O_3. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of O_3, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.[29] The worst air pollution conditions throughout the Air Basin typically occur from June through September.

Attainment Status

California Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-2**, *South Coast Air Basin Attainment Status (Los Angeles County)*, provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the federal and State standards. As shown in Table 4.2-2, the Air Basin is designated as nonattainment under both federal and State ambient air quality standards for O_3, and fine particulate matter PM2.5. In addition, the Los Angeles County portion of the Air Basin is designated as nonattainment for the State ambient air quality standards for PM10 and lead. It is noteworthy to mention that air quality in the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State and local levels. The O_3 and particulate matter levels have fallen significantly compared to the worst years and are expected

[28] City of Los Angeles, Plan for a Healthy Los Angeles, 2021.

[29] South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan, March 2017.

to continue to trend downward in the future despite increases in the economy and population in the Air Basin.[30]

TABLE 4.2-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)

Pollutant	Federal Standards	California Standards
O_3 (1-hour standard)	N/A[a]	Non-attainment
O_3 (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead	Non-attainment (Partial, Los Angeles County)[b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A[c]

NOTES: N/A = not applicable.

a The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.
b Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.
c In 1990, CARB identified vinyl chloride as a TAC and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.

SOURCES: USEPA, The Green Book Non-Attainment Areas for Criteria Air Pollutants. Accessed April 2022. https://www.epa.gov/green-book.
CARB, Area Designations Maps/State and National. Accessed April 2022. http://www.arb.ca.gov/desig/adm/adm.htm.

Land development projects do not emit in any appreciable quantities the State-identified criteria pollutants hydrogen sulfide and vinyl chloride. Trace amounts of hydrogen sulfide may be emitted by common municipal solid waste such as household food wastes. Vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products and is primarily emitted from industrial processes.[31] Vinyl chloride generally is not emitted directly during operations or during construction of a land use development project. Most land developments only emit trace amounts or otherwise account for sulfates and visibility-reducing particles through other criteria pollutants. As previously stated, sulfates are associated with SO_2 emissions and visibility-reducing particles are associated with particulate matter emissions. Therefore, these pollutants will not independently be evaluated as they are associated with other criteria pollutants.

Sources of Emissions

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point stationary sources, area stationary sources, on-road mobile sources, and off-

30 SCAQMD, Final 2016 Air Quality Management Plan, p. 1-6.

31 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed July 8, 2022.

road mobile sources. Point and area sources are the two major subcategories of stationary sources.[32] Point sources are permitted facilities that contain one or more emission sources at an identified location (e.g., power plants, refineries, emergency generator exhaust stacks). Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, and consumer products), which are distributed across the region. Mobile sources consist of two main subcategories: On-road sources (such as cars and trucks), and off-road sources (such as heavy construction equipment).

Local Air Quality

Existing Criteria Pollutants Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. As shown in **Figure 4.2-1**, *SCAQMD General Forecast Areas and Air Monitoring Areas*, the Project Site is located in SCAQMD Source Receptor Area (SRA) 2; therefore, the monitoring station most representative of the Project Site is the Northwest Coastal LA County Monitoring Station. Criteria pollutants monitored at this station include O_3, NO_2, and CO. Data for SO_2, lead, PM10 and PM2.5 are not monitored at this station therefore data is from the nearest representative monitoring site for these pollutants. The Southwest Coastal LA County Monitoring Station, south of the Project Site was used to report data for SO_2, lead, and PM10. The Central LA station, located east of the Project Site, was used for PM2.5 monitoring data. The most recent data available from the SCAQMD for these monitoring stations are from years 2018 to 2020. The pollutant concentration data for these years are summarized in **Table 4.2-3**, *Ambient Air Quality Data.*

TABLE 4.2-3
AMBIENT AIR QUALITY DATA

Pollutant/Standard[a,b]	2018	2019	2020
O_3 (1-hour)			
Maximum Concentration (ppm)	0.094	0.086	0.134
Days > CAAQS (0.09 ppm)	0	1	6
O_3 (8-hour)			
Maximum Concentration (ppm)	0.073	0.075	0.092
4th High 8-hour Concentration (ppm)	0.068	0.064	0.078
Days > CAAQS (0.070 ppm)	2	1	8
Days > NAAQS (0.075 ppm)	0	0	5
NO_2 (1-hour)			
Maximum Concentration (ppm)	0.065	0.065	0.065
98th Percentile Concentration (ppm)	0.046	0.046	0.046
NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.013	0.013	0.013
CO (1-hour)			
Maximum Concentration (ppm)	1.6	1.9	2.0

[32] SCAQMD, Final 2016 Air Quality Management Plan, p. 3-32.

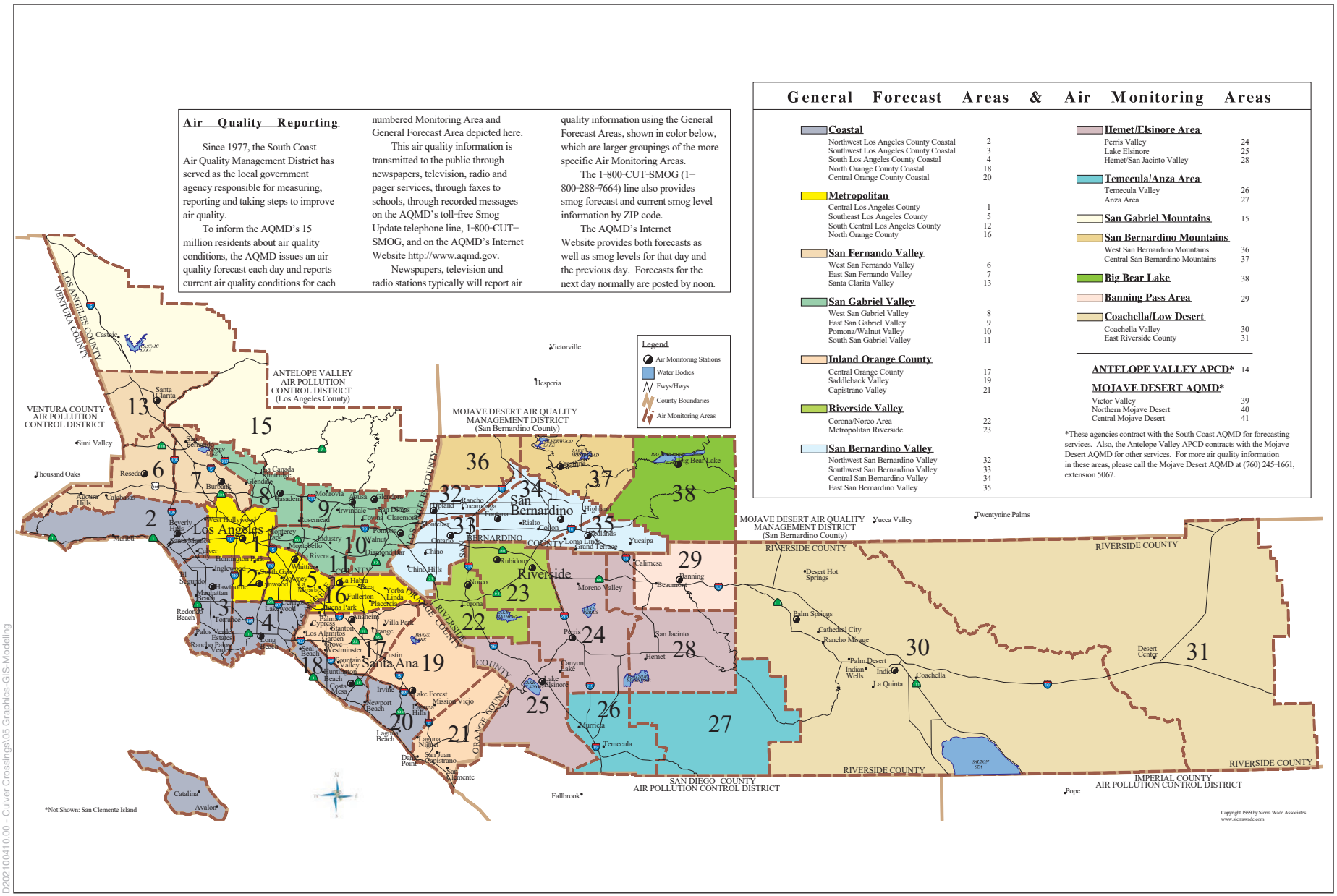
Pollutant/Standard[a,b]	2018	2019	2020
CO (8-hour)			
Maximum Concentration (ppm)	1.3	1.2	1.2
SO_2 (1-hour)			
Maximum Concentration (ppm)	0.012	0.008	0.006
99th Percentile Concentration (ppm)	0.005	0.004	0.003
SO_2 (24-hour)			
Maximum Concentration (ppm)	--	--	--
PM10 (24-hour)			
Maximum Concentration (µg/m^3)	45	62	43
Samples > CAAQS (50 µg/m^3)	0	2	0
Samples > NAAQS (150 µg/m^3)	0	0	0
PM10 (Annual Average)			
Annual Arithmetic Mean (20 µg/m^3)	20.5	19.2	22.5
PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	43.8	43.5	47.3
98th Percentile Concentration (µg/m^3)	30.5	28.3	28.0
Samples > NAAQS (35 µg/m^3)	3	1	2
PM2.5 (Annual)			
Annual Arithmetic Mean (12 µg/m^3)	12.58	10.85	12.31
Lead			
Maximum 30-day average (µg/m^3)	0.005	0.004	0.008

NOTES: ppm = parts per million; µg/m3 = micrograms per cubic meter.

a The monitoring station most representative of the Project Site is Station number 91 in Northwest Costal LA County, which is used to establish ambient ozone, NO2, and CO, levels. Since data for SO2, lead, PM10 and PM2.5 are not monitored at this station, the Station in Southwest Coastal LA County was used to report data for SO2, lead, and PM10 and the Central LA Station was used to report data for PM2.5 The most recent data available from SCAQMD for these monitoring stations are from years 2018 to 2020.

b CAAQS are based on a not to exceed standard. NAAQS are based on a 3-year average of the annual 4th highest daily maximum 8-hour concentration for ozone; 98th percentile of 1-hour daily maximum concentrations averaged over 3 years for 1-hr NO2; and not to be exceeded more than once per year on average over 3 years for 24-hr PM.

SOURCE: SCAQMD, Historical Data by Year, 2018-2020. Accessed April 8, 2022. As of June 22, 2022, no additional data for 2021 are available. http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year.



SOURCE: South Coast Air Quality Management District, 1999

Crossings Campus

Figure 4.2-1
SCAQMD General Forecast Areas and Air Monitoring Areas

ESA

D202100410.00 - Culver Crossings\05 Graphics-GIS-Modeling

Toxic Air Contaminants

In August 2021, the SCAQMD released the Final Multiple Air Toxics Exposure Study V (MATES V).[33] The MATES V study includes a fixed site monitoring program with ten stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the Air Basin. The purpose of the fixed site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been re-examined using current OEHHA and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. This has led to a reduction of the Basin Average Air Toxics Cancer Risk in MATES V, 455 in a million, from MATES IV, 997 in a million.[34] The key takeaways from the MATES V study are as follows: air toxics cancer risk has decreased by about 50 percent since MATES IV based on modeling data, MATES V Basin average multi-pathway air toxics cancer risk is 455 in a million, with the highest risk locations being near Los Angeles International Airport, downtown and the ports areas, DPM is the main risk driver for air toxics cancer risk, goods movement and transportation corridors have the highest air toxics cancer risks, and the chronic noncancer risk was estimated for the first time with a chronic hazard index of approximately 5 to 9 across the ten fixed stations. As shown in **Figure 4.2-2**, *MATES Cancer Risk*, the Project Site has an average background cancer risk of 468 in 1 million in zip code 90232 (Culver City) and an average background cancer risk of 473 in 1 million in zip code 90034 (Los Angeles).[35]

Existing Project Site Emissions

Existing criteria pollutant emissions are presented in **Table 4.2-4,** *Estimated Existing Emissions (pounds per day),* for the current emissions of the existing buildings and land uses on the Culver City and Los Angeles parcels. The Culver City parcel is currently partially vacant, with one warehouse being used for storage, therefore, existing operational emissions for this parcel are minimal. These existing emissions are subtracted from the regional operational emissions from the Project in Table 4.2-7. Detailed assumptions and emissions calculations are provided in Appendix B of this Draft EIR.

[33] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.
[34] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.
[35] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.

TABLE 4.2-4
ESTIMATED EXISTING EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NOX	CO	SO2	PM10	PM2.5
Culver City Parcel Sources						
Area (Consumer products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	<1	<1	1	<1	<1	<1
Culver City Parcel Existing Emissions	<1	<1	1	<1	<1	<1
Los Angeles Parcel Sources						
Area (Consumer products, Landscaping)	2	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	4	6	38	<1	4	1
Los Angeles Parcel Existing Emissions	6	6	39	<1	4	1
Total Existing Operational Emissions	**6**	**6**	**39**	**<1**	**4**	**1**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

SOURCE: ESA, 2022.

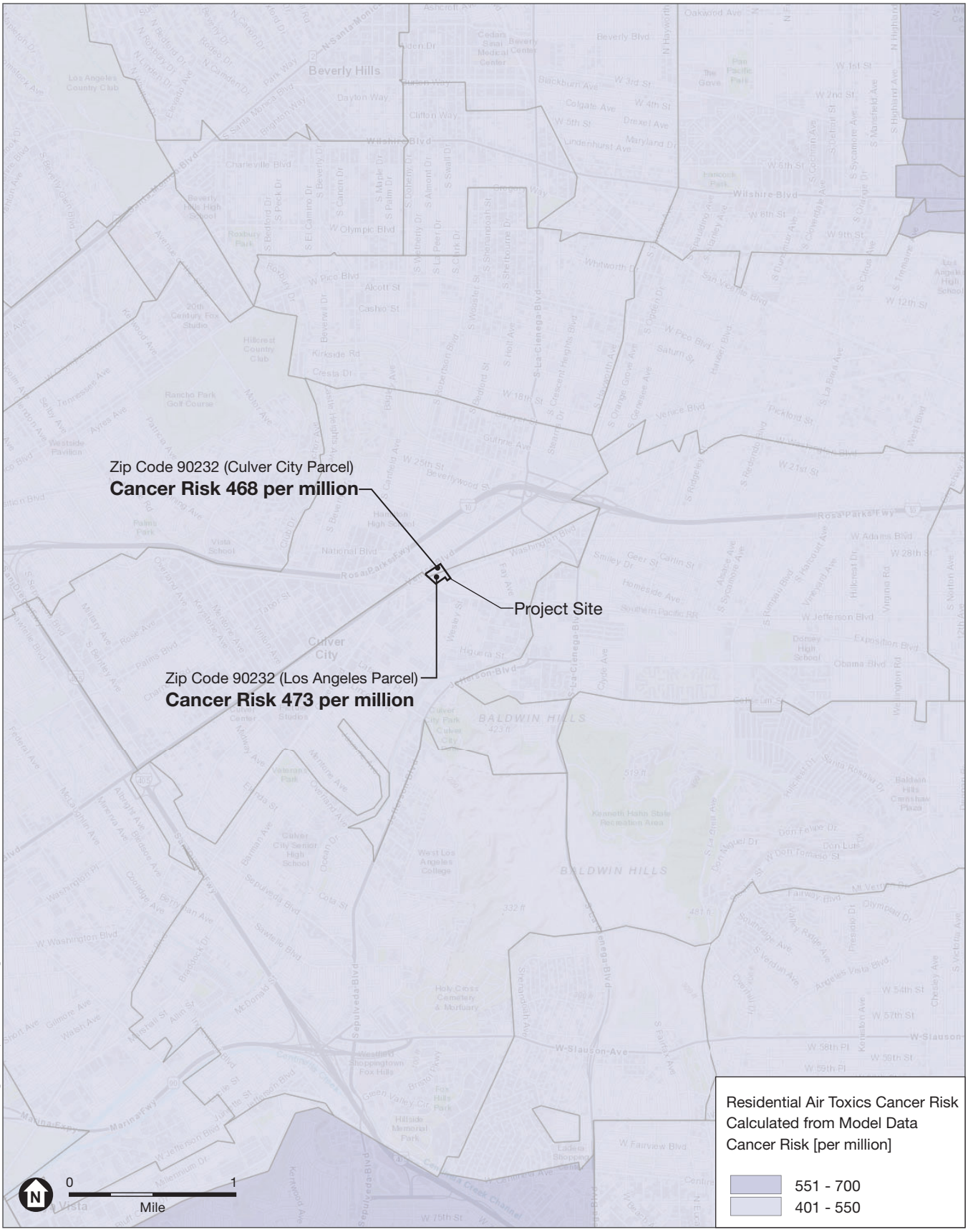
Air Quality Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others.[36] As a result, certain land uses that are occupied by these population groups, such as residences, schools, playgrounds and childcare center, hospitals, rehabilitation centers, convalescent centers, and retirement homes are considered to be air quality sensitive land uses (i.e., air quality–sensitive receptors). Sensitive land uses within approximately one-quarter mile (1,320 feet) of the Project Site are shown in **Figure 4.2-3**, *Air Quality Sensitive Receptors*, and include the following:

- North (Residential): Existing residential uses located in the City of Los Angeles approximately 250 feet to the north of the Project Site and north of Venice Boulevard.
- West (Residential): Existing residential uses located in the City of Culver City approximately 100 feet to the west of the Project Site and west of National Boulevard.
- South (Residential): Existing residential uses located in the City of Culver City approximately 120 feet to the south of the Project Site and south of Washington Boulevard, east of National Boulevard.
- East (Residential): Existing residential uses located in the City of Culver City approximately 370 feet to the east of the Project Site and south of Washington Boulevard, west of Helms Avenue.

All other air quality sensitive receptors are located at greater distances from the Project Site, and would be less impacted by Project emissions. Impacts are quantified for the sensitive receptors listed here.

[36] SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.



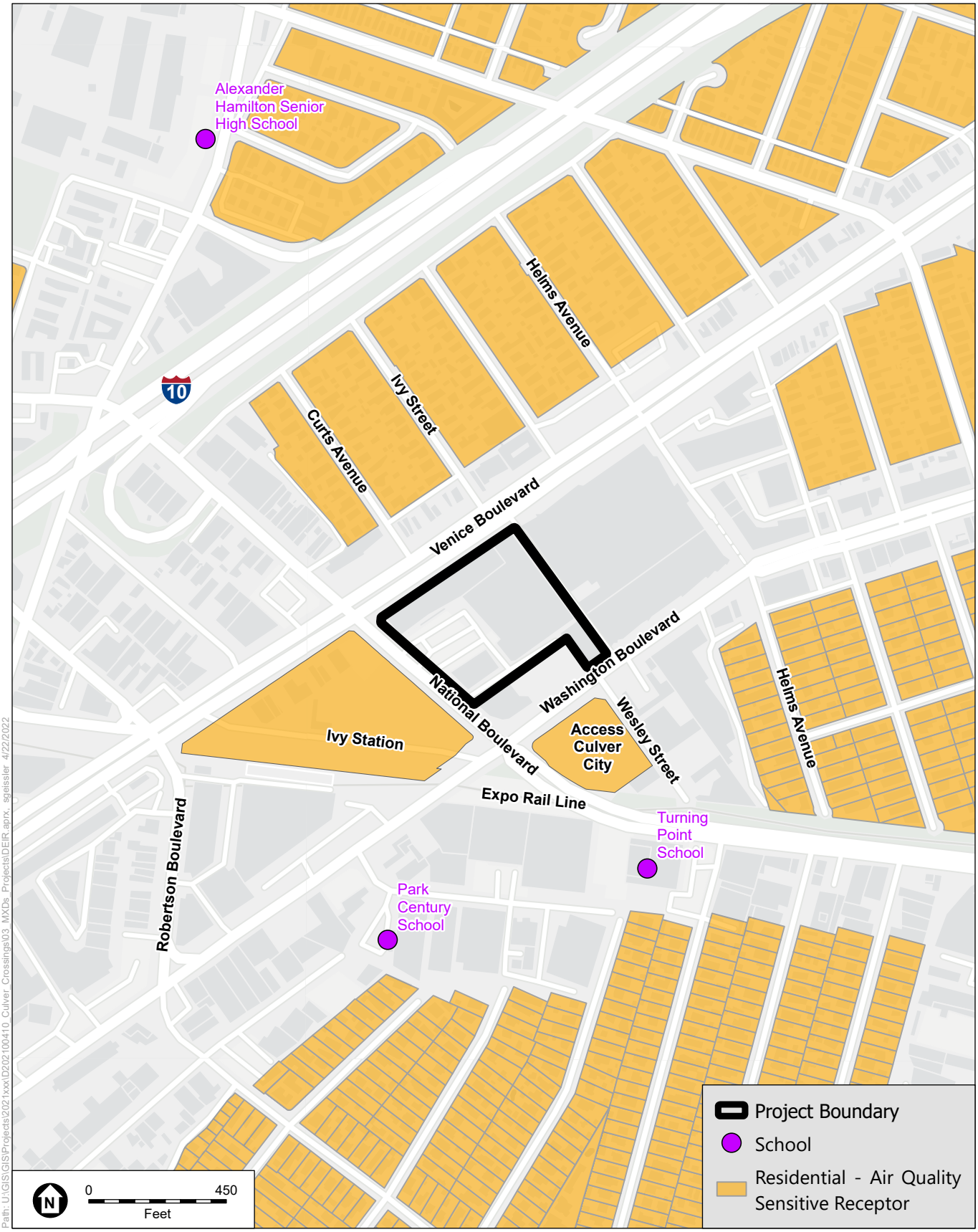
D2021004l0.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: South Coast Air Quality Management District, 2022

Crossings Campus

Figure 4.2-2
MATES Cancer Risk

ESA



Path: U:\GIS\GIS\Projects\2021xxx\D2021100410_Culver_Crossings\03_MXDs_Projects\DEIR.aprx, sgeissler 4/22/2022

SOURCE: ESRI Light Gray Base

Crossings Campus

Figure 4.2-3
Air Quality Sensitive Receptors

ESA

4.2.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to air quality if it would:

- **AIR-1:** Conflict with or obstruct implementation of the applicable air quality plan;
- **AIR-2:** Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;[37]
- **AIR-3:** Expose sensitive receptors to substantial pollutant concentrations; or
- **AIR-4:** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

For this analysis, the Appendix G Thresholds are relied upon. The factors to evaluate air quality impacts are listed below:[38]

- Combustion Emissions from Construction Equipment
  - Type, number of pieces, and usage for each type of construction equipment;
  - Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
  - Emission factors for each type of equipment.
- Fugitive Dust: Grading, Excavation and Hauling
  - Amount of soil to be disturbed on-site or moved off-site;
  - Emission factors for disturbed soil;
  - Duration of grading, excavation and hauling activities;
  - Type and number of pieces of equipment to be used; and
  - Projected haul route.
- Fugitive Dust: Heavy-Duty Equipment Travel on Unpaved Roads
  - Length and type of road;
  - Type, number of pieces, weight and usage of equipment; and
  - Type of soil.
- Other Mobile Source Emissions
  - Number and average length of construction worker trips to project site, per day; and
  - Duration of construction activities.

[37] For the purposes of this Draft EIR, the City of Culver City has included analysis of all regulated criteria pollutants, regardless of attainment status, for exceedances of applicable federal or state ambient air quality standards.

[38] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, construction air quality emissions are evaluated in consideration of the criteria set forth by SCAQMD. Pursuant to the CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the City of Culver City has determined to assess the potential air quality impacts of the Project in accordance with the most recent thresholds adopted by SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance, as discussed below.[39]

Conflict or Obstruct Implementation of the Applicable Air Quality Plan

In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's potential to conflict with or obstruct implementation of the SCAQMD 2016 AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

Construction and Operational Emission Air Quality Standards

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for O_3, PM10, PM2.5, and lead (which is only in non-attainment for the Los Angeles County portion of the Basin).[40] SCAQMD methodology recommends that significance thresholds be used to determine the potential cumulative impacts to regional air quality along with a project's consistency with the current AQMP.

SCAQMD has established numerical significance thresholds for construction and operational activities. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[41] Given that construction impacts are temporary and

[39] While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and therefore would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

[40] SCAQMD has the Partial Nonattainment designation – Los Angeles County portion of the Basin resulted from localized emissions from the two sources in the City of Vernon and the City of Industry that are no longer in operation. It is expected that this area would receive redesignation to attainment based on current monitoring data. SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.

[41] SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.

limited to the construction phase, SCAQMD has established numerical significance thresholds specific to construction activity. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of a federal or State non-attainment pollutant if emissions of O_3 precursors (VOC and NOx), PM10, or PM2.5 would exceed the values shown in **Table 4.2-5**, *SCAQMD Regional Emissions Thresholds (pounds per day)*.[42]

TABLE 4.2-5
SCAQMD REGIONAL EMISSIONS THRESHOLDS (POUNDS PER DAY)

Activity	VOC	NOx	CO	SO2	PM10	PM2.5
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

SOURCE: SCAQMD, SCAQMD Air Quality Significance Thresholds, April 2019.

Localized Significance Thresholds

In addition, SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NOx and/or CO during construction or operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO_2 of 0.18 ppm over one hour and 0.03 ppm annually and/or CO of 20 ppm over one hour and nine ppm over eight hours.[43]
- Maximum daily localized emissions of PM10 and/or PM2.5 during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 $\mu g/m^3$ over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM10 and/or PM2.5 during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 $\mu g/m^3$ over 24 hours (SCAQMD Rule 1303 allowable change in concentration).
- The following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively.
  - Where the CO standard is exceeded at the intersection, a project would result in a significant impact if the incremental increase due to the project is equal to or greater than

42 SCAQMD, Air Quality Significance Thresholds, April 2019.
43 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard.

SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling.[44] This analysis uses the screening criteria to evaluate impacts from localized emissions where applicable.

Toxic Air Contaminants

Based on criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of TACs if it emits carcinogenic materials or TACs that result in a maximum incremental cancer risk of 10 in one million, or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million), or an acute or chronic hazard index of 1.0.[45]

As discussed in the *Methodology* subsection below, construction impacts from TACs are evaluated qualitatively as the Project's construction would not generate long-term TAC emissions. For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

Objectionable Odors and Other Emissions

With respect to other emissions, such as odors, the Project would be considered significant if it created objectionable odors affecting a substantial number of people. In addition, based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of an attainment, maintenance, or unclassified pollutant if emissions of CO or SO_2 would exceed the values shown in Table 4.2-3. As discussed in the *Methodology* subsection below, odors were determined to be less than significant in the Initial Study, which is included as Appendix A of this Draft EIR, and therefore are not addressed in this section.

Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the Air Quality and Greenhouse Gas Emissions Calculations in Appendix B of this Draft EIR.

Regional Emissions

Construction

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators, backhoes, dumpers, loaders, tractors, pavers, forklifts, and through vehicle trips generated from workers and haul trucks

[44] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

[45] SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants); SCAQMD, Air Quality Significance Thresholds.

traveling to and from the Project Site. In addition, fugitive dust emissions (such as PM10 and PM2.5) would result from demolition and various soil-handling activities including grading and excavation. Mobile source emissions, primarily NO_X and PM, would result from the use of construction equipment such as excavators, backhoes, and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity and construction equipment used, and prevailing weather conditions.

Although construction would be continuous and overlapping for two buildings, to more accurately assess the emissions within CalEEMod, the construction schedules and activities were broken out separately for activities related for construction for each of the two buildings. Construction of Building 1 is projected to begin in the first quarter of 2023 with completion by the fourth quarter of 2024, while construction of Building 2 would begin in the third quarter of 2023 with completion in the fourth quarter of 2025. Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities and applying the mobile source and fugitive dust emissions factors. These assumptions consider overlapping construction activities and hence represent a worst-case day and do not represent the emissions that would occur for every day of Project construction. Construction activities would include demolition of the existing warehouses, site preparation, grading and excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, paving and architectural coating. Demolition activities would remove approximately 105,000 square feet (sf) of existing buildings, including approximately 3,600 cubic yards (cy) of concrete. The Project would export approximately 290,000 cubic yards of soil during grading and excavation activities. The bulk of soil excavation and export would be associated with the construction of the two separate three-level subterranean garages under each proposed building. Heavy-duty equipment, vendor supply trucks and concrete trucks would be used during construction of foundations, subterranean parking structure, and building. Landscaping and architectural coating would occur during the finishing activities. The maximum daily regional emissions from concurrent construction activities were determined and compared to the SCAQMD significance thresholds.

The emissions are estimated using CalEEMod (Version 2020.4.0) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from OFFROAD and CARB's EMFAC model, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Construction haul and vendor truck emissions as well as worker vehicle emissions were evaluated outside of CalEEMod using emission factors from EMFAC2021 (Appendix B). Daily truck trips and applicant-provided trip length data were used to assess roadway emissions from truck exhaust, as well as idling emissions based on typical idling activities. The input values used in this analysis were adjusted to be Project-specific based on equipment types, construction phasing, and the construction schedule provided by the Applicant. These values were then used in the criteria pollutant analysis to generate criteria pollutant emissions values for each type identified construction activity.

Operational

Operation of the Project would generate criteria pollutant emissions from Project-generated vehicles trips traveling to and from the Project Site, energy sources on-site such as natural gas

combustion, area sources such as landscaping equipment and use of consumer products including solvents used in non-industrial applications which emit VOCs during their product use, such as cleaning supplies and kitchen aerosols. The Project would also produce criteria pollutant emissions from the onsite diesel-fueled emergency generator that would be used in the event of a power outage. The 200-kilowatt (kW) diesel generator would have an USEPA rated Tier 4 engine. The emergency generator is anticipated to operate for a maximum of 2 hours per day and 50 hours per year for maintenance and testing. Operational impacts were assessed for the first full Project buildout year in 2026.

The operational emissions are estimated using the CalEEMod software. CalEEMod was used to forecast the Project's daily regional emissions from area sources that would occur during long-term Project operations. CalEEMod was modified to include the energy usage and energy intensity factors shown in Section 4.14.4, *Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Facilities*, and the CalEEMod assumptions are included in Appendix B of this Draft EIR. Mobile source emissions are estimated based on EMFAC2021 model and adjusted in CalEEMod. Mobile source emissions are based on the trip generation rates and vehicle miles travelled provided in the VMT Calculator in Appendix B of this Draft EIR.

Operational air quality impacts from the Project were assessed as a net impact removing existing emissions from the current operations on each parcel. The Culver City parcel has two warehouse buildings consisting of a 9,739-sf building that is currently used for storage and a 9,082-sf that is vacant. The warehouses currently on the Los Angeles parcel have been partitioned into 51,500-sf of office space and 34,726-sf retail space along with 70 spaces of enclosed vehicular parking. The existing emissions were estimated based on these land uses and occupied square footage. The maximum daily emissions from operation of the Project minus existing land use operational emissions are compared to the SCAQMD daily regional significance thresholds.

Localized Emissions

Construction

The localized effects from the on-site portion of the construction emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's Localized Significance Threshold (LST) Methodology.[46] The localized significance thresholds are only applicable to NO_X, CO, PM10, and PM2.5. LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of federal or state ambient air quality standard. LSTs are based on the ambient concentrations of that pollutant within the located and the distance to the nearest sensitive receptor.

The SCAQMD has established screening criteria for projects that disturb five acres or less that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The localized analysis is based on this SCAQMD screening criteria. The screening criteria depend on: (1) the area in which the Project is located, (2) the size of the Project Site, and (3) the distance between the Project

[46] SCAQMD, Localized Significance Thresholds. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed July 8, 2022.

Site and the nearest sensitive receptor. The Project Site is located in the SCAQMD SRA 2 (Northwest Coastal LA County) and could disturb up to a maximum of 4.46 acres on a given day. SCAQMD LST screening tables contain screening criteria for projects of 1 acre, 2 acres, and 5 acres, with higher thresholds for larger projects (i.e., the allowed maximum daily emission rates increase as the project size increases from 1 to 5 acres). As the area of disturbance from the Project would be between 2 and 5 acres, the LST thresholds have been interpolated for a 4.46-acre site. Therefore, the SCAQMD LST screening criteria applicable to a 4.46-acre site in SRA 2 with sensitive receptors located within 25 meters to the Project Site was used.

Sensitive receptors include residences that are sensitive to adverse air quality. As previously discussed, sensitive receptors are located in proximity to the Project Site and have the potential to be exposed to localized construction and operational emissions.

Operation

The localized effects from the onsite portion of the operational emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology, which relies on on-site mass emission rate screening tables and project-specific dispersion modeling, where appropriate. Similar to construction, the SCAQMD LST screening criteria applicable to a 4.46-acre site in SRA 2 with sensitive receptors located within 25 meters was used.

Carbon Monoxide Hotspots

Emissions of CO are generated in greatest quantities from motor vehicle combustion of fossil fuels, and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed State and/or federal standards are termed CO hotspots. The potential for the Project to cause or contribute to the formation of offsite CO hotspots are evaluated based on prior dispersion modeling of the four busiest intersections in the Air Basin that has been conducted by SCAQMD for its CO Attainment Demonstration Plan in the conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin that include: Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; La Cienega Boulevard and Century Boulevard; and Long Beach Boulevard and Imperial Highway.[47] In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate (I) 405 in Westwood. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source

[47] The 2003 AQMP is the most current AQMP that provides modeling and attainment demonstration for CO.

Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities).

Toxic Air Contaminants Impacts

The SCAQMD has also adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

Potential TAC impacts are initially evaluated by conducting a qualitative analysis consistent with SCAQMD guidance and the CARB Handbook. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. If the qualitative evaluation determines the potential for significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed dispersion analysis is conducted to evaluate estimated Project TAC emissions against the applicable SCAQMD significance thresholds based on downwind sensitive receptor locations.

Project Design Features

No specific project design features are proposed with regard to air quality. However, the Project would incorporate project design features to support and promote environmental sustainability as discussed under Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR (refer to Project Design Features GHG-PDF-1 and TRAF-PDF-2). While these features are designed primarily to reduce GHG emissions, they would also serve to reduce criteria air pollutants discussed herein.

Analysis of Project Impacts

Threshold AIR-1: Would the Project conflict with or obstruct the implementation of the applicable air quality plan?

Impact Analysis

SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with SCAQMD's CEQA Air Quality Handbook, Chapter 12, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or

  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 AQMP and other applicable plans and policies.

Criterion 1: Air Quality Violations or Delay Attainment

With respect to the first criterion, as discussed in more detail under the analysis for Threshold AIR-2 below, regional concentrations of NO_2 as NO_X, VOC, SO_2, CO, PM10, and PM2.5 have been analyzed for the Project. As shown in Table 4.2-6 in Threshold AIR-2 below, regional maximum daily Project construction emissions would exceed the SCAQMD regional construction emissions thresholds for NOx. With implementation of Mitigation Measure AQ-MM-1, as shown in Table 4.2-9, all criteria air pollutants for regional construction emissions would be below SCAQMD regional construction emissions thresholds. However, even with implementation of Mitigation Measure AQ-MM-1, the overlap of regional construction and operational emissions would exceed SCAQMD regional operational emissions threshold for NOx emissions.

CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status; they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have.[48,49] Therefore, just because a project exceeds the mass regional emissions threshold (i.e., pounds per day NO_X thresholds) from project-related activities does not necessarily indicate that a project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

The primary health concern with exposure to NO_X emissions is the secondary formation of ozone. Based on discussions with air quality management district staff, and as the *amicus curiae* brief submitted for the *Sierra Club v. County of Fresno* case (*Friant Ranch Case*) suggested, because of the complexity of ozone formation and given the state of environmental science modeling in use at this time, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., NO_X and VOCs) emissions would potentially result in the formation of secondary ground-

48 SCAQMD, Amicus Brief in Support of Neither Party, Sierra Club v. County of Fresno, April 6, 2015.

49 San Joaquin Valley Air Pollution Control District (SJVAPCD), Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, Filed April 13, 2015.

level ozone and the geographic and temporal distribution of such secondary formed emissions.[50] As previously stated, meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NO_X or VOCs emissions from local level (project-level). Notwithstanding these scientific constraints, the disconnect between project-level NO_X emissions and ozone-related health impact cannot be bridged at this time.

As discussed in more detail under the analysis for Threshold AIR-3 below, localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations, in part due to the ultra-low sulfur diesel regulations (13 CCR Section 2281), and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

The Project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in Table 4.2-11 and Table 4.2-12 in Threshold AIR-3 below, localized maximum daily Project construction and operational emissions would not exceed SCAQMD localized construction and operational emissions thresholds, respectively, for NO_X, CO, PM10, and PM2.5. As explained in greater detail in Threshold AIR-3 below, the health-based ambient air quality standards for O_3 are measured as concentrations of O_3 and not as tonnages of their precursor pollutants (i.e., NO_X and VOCs). The Project would not obstruct implementation of the 2016 AQMP, as discussed under Threshold AIR-2, and Threshold AIR-3, since its regional construction and operational emissions would be less than significant with implementation of feasible mitigation measures (discussed further below under the Section 4.2.3 *Project Impacts, Threshold AIR-2, Mitigation Measures*), and its localized construction and operational emissions would be less than significant. While the overlap of regional construction and operational emissions would exceed the SCAQMD regional operational emissions threshold for NOx emissions, the exceedance would be intermittent and temporary.

The Project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[51] As indicated below in Threshold AIR-3, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be

[50] Models available today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from a project level.

[51] SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, April 1993.

less than significant. Accordingly, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

Therefore, in response to Criterion 1, Project construction and operations would not increase the frequency or severity of an existing violation or cause or contribute to new violations for any criteria pollutant with implementation of Mitigation Measure AQ-MM-1. Accordingly, impacts regarding the timely attainment of air quality standards or interim emission reductions specified in the AQMP would be less than significant.

Criterion 2: Exceed AQMP Assumptions

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these measures.

Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

Construction Growth Projections

The Project would generate approximately 411 short-term construction jobs,[52] but these jobs would not necessarily bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed, and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be temporary in nature. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based. Impacts would be less than significant.

Operations Growth Projections

As discussed in the Initial Study, which is included in Appendix A of this Draft EIR, the Project's growth would fall within the growth projections contained in the 2016–2040 RTP/SCS, which forms the basis of the growth projections in the 2016 AQMP.[53] The Project would include office space suitable for approximately 2,400 occupants including 748 occupants in Building 1 and 1,652 occupants in Building 2.[54] In addition to office space, there could be production spaces for

[52] The construction job estimate is based on the total estimated number of daily workers needed during all phases of Project construction activities for the two buildings, as shown in Appendix B of this Draft EIR (see "Construction Assumptions" on page 2 of Appendix B). The number of construction workers at the Project site on any given day would vary based on the construction schedule.

[53] While the Initial Study discusses the 2020-2045 RTP/SCS in the Population and Housing analysis, the growth projections from the 2016-2040 RTP/SCS are used here. As the 2022 AQMP is still in progress, the 2016 AQMP, which uses the 2016-2040 RTP/SCS growth projections, would be the most appropriate for the analysis. Both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS have similar control measures and strategies to limit VMT and concentrate development in HQTAs. Therefore, the 2020-2045 RTP/SCS discussion in the Initial Study would not conflict with the analysis regarding growth projections in this section.

[54] The estimated occupant projections are based on the tenant's operational space planning for office buildings and similar existing facilities operated by the tenant.

multimedia content creation and capture as well as amenities for building tenants such as an employee cafeteria, coffee stations, and employee shuttle service.

SCAG's final growth forecast for employment details 1,899,500 employees in 2020 to 2,169,100 employees in 2040 in the City of Los Angeles and 49,100 employees in 2020 and 53,000 employees in 2040 in the City of Culver City.[55] The Project's estimated increase in employees would represent approximately less than 1 percent of the growth in employees in the City of Los Angeles (Building 2) and 19 percent of the growth in employees in the City of Culver City (Building 1) in the 2016–2040 RTP/SCS, between 2020 and 2040. The Project would, therefore, also fall within the growth projections as contained in the 2016–2040 RTP/SCS, and ultimately the growth projections in the AQMP.

The growth would occur in a transit rich area, which would minimize potential growth in transportation-related emissions. The Project Site is served by the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and multiple Metro and local bus lines that provide service along Venice, National, and Washington Boulevards

As discussed above under the *Methodology* subsection, projects, uses, and activities that are consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based would not jeopardize attainment of the air quality reductions identified in the AQMP, even if their emissions exceed the SCAQMD's thresholds of significance.[56] As a result, the Project would not conflict with the growth projections used in the development in the 2016 AQMP. Impacts would be less than significant.

Does the project implement feasible air quality mitigation measures?

The Project would implement Mitigation Measure AQ-MM-1 to reduce short term NO_X emissions impacts during construction to less than significant. The Project would also comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, as summarized above. In addition, the Project would incorporate project design features to support and promote environmental sustainability as discussed in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce the criteria air pollutants discussed herein. Furthermore, with compliance with the regulatory requirements identified above and in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, no significant air quality impacts would occur. As such, the Project meets this AQMP consistency criterion.

To what extent is project development consistent with AQMP control measures?

As discussed in Section 4.2.3, *Project Impacts*, under *Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP even if their emissions exceed the SCAQMD's thresholds of significance. As discussed below, compliance with the applicable required fleet rules and control strategies and requirements

[55] Based on SCAG 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction.

[56] SCAQMD, CEQA Air Quality Handbook 1993, p. 12-1, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.

would render it consistent with, and meet or exceed, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Project's construction-related and operations-related criteria pollutant emissions would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., O_3, PM10, and PM2.5)[57] or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

Construction

During its construction phase, the Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, the Project would utilize construction contractors in compliance with State on-road and off-road vehicle rules, including the ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location (Title 13 CCR, Section 2485), the Truck and Bus regulation that reduces NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025) and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). The Project's construction contractor would be required to comply with these regulatory control measures and other applicable SCAQMD rules specified and incorporated in the 2016 AQMP. Compliance with these regulatory control measures would ensure the Project would not conflict with AQMP control strategies intended to reduce emissions from construction equipment and activities. Impacts would be less than significant.

Operation

The Project's location, design, and land uses would be consistent with the 2016 AQMP during operations. As discussed above, the 2016 AQMP includes land use and transportation strategies from the SCAG 2016–2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies, such as SCAG and SCAQMD, although some can be furthered by individual development projects.

With regard to land use developments such as the Project, the 2016–2040 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within High Quality Transit Areas (HQTAs) and reducing vehicle trips and VMT. The Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial uses within an HQTA. Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS, as it is located within an HQTA. The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project Site is served by the Los Angeles County

[57] The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

Metro "E" Line and multiple Metro and local bus lines that provide service along Venice, National, and Washington Boulevards.

As described in Section 4.12, *Transportation*, of this Draft EIR, the Project would support transportation control strategies related to reducing vehicle trips for employees and visitors. The Project proposes to widen existing accessible sidewalks along the full frontages along Venice Boulevard and National Boulevard. Bicycle racks for visitors would be available in the publicly accessible amenity area on Washington Boulevard and on the sidewalk on both sides of the Venice Boulevard entrance. Secured bicycle parking for employees would be provided in the parking garage. The Project would provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with both the City of Los Angeles and City of Culver City municipal code requirements. Pedestrian access would be provided via new 15-foot-wide sidewalks located on the perimeter of the Project Site from National Boulevard and Venice Boulevard. Employees and visitors arriving at the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities.

The Project Site would be served by an existing fixed-route intercampus shuttle program that currently transports employees between Apple buildings in Culver City and the Metro "E" Line Station. The existing shuttle runs between 8:00 a.m. and 6:00 p.m., Monday through Friday, with a 10-minute to 15-minute frequency. Specific pick-up/drop-off locations might include other Apple-occupied buildings in the area and the Culver City Station rider drop-off located on Robertson Boulevard. There would be two curbside cut-outs to serve as pick-up and drop-off areas for the Project Site, one located in front of Building 1 on National Boulevard, and the other in front of Building 2 along Venice Boulevard. The employee shuttle stop would be designed with sufficient distance as to not interfere with the function of the municipal bus stop located on the southeast corner of the Venice and National Boulevard intersection.

Furthermore, the Applicant has proposed a voluntary Transportation Demand Management (TDM) Program, as required by Project Design Features TRAF-PDF-2, to make non-automobile commutes attractive and viable options by providing employees with mobility once they arrive at work, access to needed services during the day, and other financial incentives to participate. This is described in detail in Section 4.12, *Transportation*, of this Draft EIR.

This analysis provides evidence of the Project's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NO_X and PM2.5. As described above, the Project is well served by transit, the existing fixed-route intercampus shuttle program, and bicycle/pedestrian access, which would reduce vehicle trips and VMT and result in the corresponding reduction in air pollutant emissions. The TDM Program would additionally reduce single-occupancy vehicle trips to the Project Site.

Project operation would also comply with applicable SCAQMD rules for operational emissions sources, including Rule 1470 for controlling emissions from the emergency generator, Rule 1113 for controlling VOC emissions from architectural coatings, and Rule 1146.2 for controlling emissions from large water heaters.

Thus, the Project would not conflict with the 2016 AQMP with respect to transportation control strategies from the 2016–2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. Impacts would be less than significant.

The City of Culver City General Plan and Mandatory Green Building Program

The Project would promote the City of Culver City General Plan objectives and policies to reduce single occupancy vehicle trips and VMT through its location near public transit, project design, and TDM Program, as required by Project Design Feature TRAF-PDF-2. As described above and in Section 4.12, *Transportation*, of this Draft EIR, the Project would provide bicycle access and on-site bicycle parking facilities, pedestrian access, an existing fixed-route intercampus shuttle program with connection to the Metro "E" Line Station, and various on-site amenities and financial incentives as part of a TDM Program. Providing pedestrian and bicycle access that minimizes barriers and links the Project Site with external streets encourages people to walk instead of drive and reduces VMT. Therefore, the Project would support a land use pattern that encourages reduced vehicle trips and transportation air pollutant emissions.

The Project would also be consistent with the City of Culver City Mandatory Green Building Program. As described in Section 2.6.7, *Sustainability Features*, the Project would be designed to achieve US Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold equivalent, inclusive of environmentally sustainable building features and construction protocols required by the City of Los Angeles Green Building Code, the Culver City Mandatory Green Building Program requirements, and California Green Building Standards (CALGreen) Building Code. These standards are intended to reduce energy and water usage and waste and, thereby, reduce associated GHG 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, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; electric vehicle (EV) charging, EV capable and EV ready spaces; and bicycle facilities that would meet or exceed both the City of Los Angeles and City of Culver City municipal code requirements, install Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation and adequate daylight. These features would indirectly reduce air pollutant emissions from the Project.

City of Los Angeles General Plan Air Quality Element and Plan for a Healthy Los Angeles

The Project would be consistent with the City of Los Angeles General Plan Air Quality Element and Plan for a Healthy Los Angeles. As the City of Los Angeles General Plan Air Quality Element would seek to reduce reliance on single occupancy vehicle trips, the Project would be consistent with this goal Th through its location near public transit, project design, and TDM Program. As described above and in Section 4.12, *Transportation*, of this Draft EIR, the Project would provide bicycle access and on-site bicycle parking facilities, pedestrian access, an existing fixed-route intercampus shuttle program with connection to the Metro "E" Line Station, and various on-site amenities and financial incentives as part of a TDM Program. The TDM Program would cover TDM Support Services, Marketing and Communications, Public Transit, Rideshare, Bicycling, Walking, Pre-tax Commuter Benefit, Commuter Club, Commute Expert Program, Guaranteed Ride

Home Program, Intercampus Shuttles, Campus Bike Share Program, and On-Site Services. The TDM Program would support a safe neighborhood, consistent with the Plan for a Healthy Los Angeles, by providing a Guaranteed Ride Home Program and these other resources. As part of the TDM Support Services, the Project would offer tailored trip planning assistance with in-house TDM coordinators. The Project would also provide a comprehensive website detailing up-to-date alternative transportation options as part of a Commute Program to share with employees on a regular basis. This would improve awareness between personal behavior and air pollution in efforts to reduce air pollution, which is consistent with the goals of the City of Los Angeles Air Quality Element. Furthermore, it would cohesively address land use, transportation, and air quality.

In addition, the Project would be consistent with the developing land use pattern that features greater concentration of urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and in close proximity to transit stops. The accessibility and mobility provided by the Project would be consistent with the Plan for a Healthy Los Angeles as it would provide people with the opportunity to thrive. Additionally, as discussed in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, the Project will comply with City of Los Angeles EV charging requirements, which include the provision of at least 30 percent of total parking spaces provided on the Project Site to be capable of supporting future electric vehicle supply equipment (EVSE) and a minimum of 10 percent of the total parking spaces in Building 2 to be equipped with EV charging stations. Provisions of the EVSE and EV parking spaces would help to facilitate and encourage use of alternative fueled vehicles and reduce the Project's mobile emissions. Other building energy efficiency measures, as mentioned above, would reduce building-related air pollutant emissions.

Based on the above analysis, the Project would not conflict with applicable goals, objectives, and policies of the City of Culver City General Plan and the Culver City Mandatory Green Building Program or the City of Los Angeles General Plan Air Quality Element and Plan for a Healthy Los Angeles pertaining to air quality, and impacts would be less than significant.

Mitigation Measures

Impacts regarding consistency with the applicable air quality plan were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding consistency with the applicable air quality plan were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold AIR-2: Would the Project 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?

Impact Analysis

Construction

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Construction emissions, primarily NO_X, would result from the use of construction equipment, such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.[58]

Individual construction activities with different types of off-road heavy-duty construction equipment and numbers of vehicle trips (workers, vendors and haul trips) will overlap over the 3-year construction period and was considered in determining the maximum daily emissions for the air quality impact analysis. For example, the foundation/concrete pour and general construction of Building 1 will occur at the same time as the excavation activities for Building 2. Similarly, during the construction of both buildings there will be days where general building construction activities, architectural coating and paving will all occur. The estimated maximum daily emissions were calculated by reviewing the schedule overlaps and determining which concurrent activities resulted in the maximum daily emissions. The overlapping activities were evaluated for each pollutant independently to determine each pollutant's maximum daily emissions. The activities resulting in the maximum daily VOC emissions, for example, involve architectural coating and paving phases, while the days and activities resulting in the maximum daily NO_X emissions are those with intensive heavy-duty equipment usage and large numbers of haul and vendor trucks. The landfill site for soil haul is approximately 30 miles from the Project Site and on-road emissions from soil haul trucks contribute heavily to the regional emissions from the Project during days where large amounts of soil are exported. These maximum daily emissions do not represent the emissions that would occur every day during Project construction, which would be lower on construction days under typical or below average construction activity conditions. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

The results of the criteria air pollutant calculations are presented in **Table 4.2-6**, *Estimated Maximum Unmitigated Regional Construction Emissions (pounds per day)*. As shown in Table 4.2.6, construction-related daily emissions of NO_X would exceed the SCAQMD thresholds of significance. Emissions of other criteria pollutants would be below SCAQMD thresholds. The NO_X emissions result primarily from heavy-duty trucks required for on-road soil hauling and from concrete trucks delivering

[58] Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant with compliance with regulations. For additional details please refer to Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR.

concrete to the Project Site from concrete suppliers. Therefore, the Project's temporary impact related to regional NO_X construction emissions would be potentially significant.

With respect to the Project's short-term construction-related air quality emissions, SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal CAA mandates. Construction of the Project would comply with SCAQMD Rule 403 fugitive dust control requirements, SCAQMD Rule 1113 for architectural coatings, and the ATCM to limit heavy-duty diesel motor vehicle idling to no more than five minutes at any location. Given that the Project's construction-related air emissions would exceed the SCAQMD's regional significance thresholds for NO_X, short-term construction impacts would be potentially significant without mitigation.

TABLE 4.2-6
ESTIMATED MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
Construction Sub-Phases						
B1 Demolition 2023	2	21	24	<1	2	1
B1 Site Preparation 2023	1	14	15	<1	1	1
B1 Grading/Excavation 2023	3	45	28	<1	4	2
B1 Drainage/Utilities/Trenching 2023	<1	4	6	<1	<1	<1
B1 Foundations/Concrete Pours 2023	7	51	43	<1	3	2
B1 Building Construction 2023	2	17	22	<1	2	1
B1 Foundations/Concrete Pours 2024	7	50	43	<1	3	2
B1 Building Construction 2024	2	15	21	<1	2	1
B1 Architectural Coating 2024	15	4	7	<1	<1	<1
B1 Paving 2024	1	10	15	<1	1	<1
B2 Demolition 2023	3	28	33	<1	4	2
B2 Site Preparation 2023	2	18	21	<1	1	1
B2 Grading/Excavation 2023	4	58	40	<1	5	2
B2 Grading/Excavation 2024	4	55	40	<1	5	2
B2 Drainage/Utilities/Trenching 2024	1	4	7	<1	<1	<1
B2 Foundations/Concrete Pours 2024	9	66	59	<1	4	3
B2 Foundations/Concrete Pours 2025	9	65	59	<1	4	3
B2 Building Construction 2025	3	23	30	<1	2	1
B2 Architectural Coating 2025	36	3	6	<1	<1	<1
B2 Paving 2025	1	6	10	<1	<1	<1
Overlapping Sub-Phases						
Demolition (B1), Site Preparation (B1) – 2023	4	36	40	<1	3	2
Site Preparation (B1), Grading/Excavation (B1) – 2023	4	59	43	<1	5	2
Drainage/Utilities/Trenching (B1), Demolition (B2) – 2023	3	31	38	<1	4	2

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
Foundations/Concrete Pours (B1), Demolition (B2) – 2023	10	78	76	<1	6	4
Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2) – 2023	12	96	97	<1	7	4
Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2) – 2023	13	126	104	<1	9	5
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2023	13	125	105	<1	10	5
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2024	13	121	104	<1	10	5
Building Construction (B1), Grading/Excavation (B2) – 2024	6	71	61	<1	7	3
Building Construction (B1), Drainage/Utilities/Trenching (B2) – 2024	3	20	28	<1	2	1
Building Construction (B1), Foundations/Concrete Pours (B2) – 2024	11	82	80	<1	5	3
Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2) – 2024	26	86	87	<1	6	4
Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2) – 2024	27	96	102	<1	6	4
Foundations/Concrete Pours (B2), Building Construction (B2) – 2025	12	89	89	<1	6	4
Building Construction (B2), Architectural Coating (B2) – 2025	39	27	36	<1	3	1
Building Construction (B2), Architectural Coating (B2), Paving (B2) – 2025	40	33	46	<1	3	2
Maximum Daily Emissions	40	126	105	<1	10	5
SCAQMD Thresholds of Significance	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	Yes	No	No	No	No

NOTES: B1= Building 1; B2 = Building 2.

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

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

SOURCE: ESA, 2022.

During 2025, there will be period of time where Building 1 is operational and Building 2 is still under construction, The emissions are presented in **Table 4.2-7,** *Estimated Maximum Unmitigated Regional Operational Emissions in 2025 and Construction Emissions in 2025 (pounds per day).* The Project's overlapping operational and construction emissions of NO_X in 2025 would exceed the SCAQMD thresholds of significance. Emissions of other criteria pollutants would be below

SCAQMD thresholds. The NO_X emissions result primarily from heavy-duty trucks from overlapping construction of Building 2 while Building 1 is operational. Therefore, the Project's temporary impact related to overlapping operational and construction regional NO_X emissions would be potentially significant.

TABLE 4.2-7
ESTIMATED MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS IN 2025 AND CONSTRUCTION EMISSIONS IN 2025 (POUNDS PER DAY)[a]

Source	VOC	NOX	CO	SO2	PM10	PM2.5
Project Emissions						
Area (Consumer products, Landscaping)	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	0	0	0	0	0	0
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Mobile	4	5	34	<1	4	1
Operational Emissions from Building 1 – 2025	8	5	36	<1	4	1
Unmitigated Construction Emissions – 2025	39	75	74	<1	3	3
Overlap of Operational and Construction Emissions – 2025	46	81	110	<1	7	4
Operational Emissions from Existing Culver City Parcel Operations (Storage)	<1	<1	1	<1	<1	<1
NET Operational and Construction Emissions – 2025	46	80	109	<1	7	4
SCAQMD Significance Thresholds	55	55	550	150	150	55
Exceeds Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

SOURCE: ESA, 2022.

Operation

Mobile, stationary, and area source operational regional criteria pollutant emissions were calculated for the Project's full buildout year in 2026 as well as for Building 1 during year 2025 (when construction is still occurring for Building 2). Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings, and Rule 1470 for controlling emissions from the emergency generator as well as adherence with fugitive dust control measures required by SCAQMD.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_X, PM10, and PM2.5 for the Project are presented in **Table 4.2-8,** *Estimated Maximum Unmitigated Regional Operational Emissions (pounds per day).* The Project's operational-related daily emissions would not exceed the SCAQMD thresholds of significance. Therefore, the Project's regional operational emissions impacts would be less than significant.

TABLE 4.2-8
ESTIMATED MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NOX	CO	SO2	PM10	PM2.5
Project Emissions						
Area (Consumer products, Landscaping)	13	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Mobile	11	15	102	<1	12	2
Project Total Regional Operational Emissions	24	17	106	<1	12	2
Existing Parcel Regional Operational Emissions	6	6	39	<1	4	1
NET Regional Operational Emissions	18	11	67	<1	9	2
SCAQMD Significance Thresholds	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

SOURCE: ESA, 2022.

Mitigation Measures

Construction

The following mitigation measures are required to reduce construction-related emissions:

AQ-MM-1: Construction Equipment Features: The Project shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment equal to or greater than 50 horsepower that will be used during any portion of the construction activities shall meet or exceed the Tier 4 Final standards. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. Alternate construction equipment may be used if the construction contractor can document that the equipment would achieve the same or greater NOx reductions compared to Tier 4 Final standards. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower

shall be encouraged to apply for SCAQMD SOON funds. Information including the SCAQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities

- During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during an Air Quality Index (AQI) of 151 or more (unhealthy level). A record of any AQI at an unhealthy level and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

Operation

Project operational regional air quality impacts would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

Construction of the Project would result in emissions that exceed the NO_X regional threshold, and, as such, impacts would be potentially significant prior to mitigation. Implementation of Mitigation Measure AQ-MM-1 would reduce short-term and temporary NO_X emissions, including from haul trucks during the grading activities, as shown in **Table 4.2-9,** *Estimated Maximum Mitigated Regional Construction Emissions (pounds per day)*. With implementation of Mitigation Measure AQ-MM-1, short-term construction NO_X emissions would be reduced to below the regional emission significance threshold for NO_X. Therefore, short-term and temporary impacts related to regional NO_X construction emissions would be less than significant with mitigation.

TABLE 4.2-9
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
Construction Sub-Phases						
B1 Demolition 2023	1	6	28	<1	1	0
B1 Site Preparation 2023	<1	3	17	<1	0	0
B1 Grading/Excavation 2023	1	30	40	<1	4	1
B1 Drainage/Utilities/Trenching 2023	<1	2	6	<1	<1	<1
B1 Foundations/Concrete Pours 2023	7	46	44	<1	3	2
B1 Building Construction 2023	1	9	23	<1	1	<1
B1 Foundations/Concrete Pours 2024	6	45	44	<1	3	2
B1 Building Construction 2024	1	8	22	<1	1	<1
B1 Architectural Coating 2024	12	1	7	<1	<1	<1
B1 Paving 2024	<1	3	16	<1	<1	<1
B2 Demolition 2023	1	8	36	<1	1	<1
B2 Site Preparation 2023	1	4	23	<1	<1	<1
B2 Grading/Excavation 2023	2	37	58	<1	4	1
B2 Grading/Excavation 2024	2	37	58	<1	4	1
B2 Drainage/Utilities/Trenching 2024	<1	2	7	<1	<1	<1
B2 Foundations/Concrete Pours 2024	9	59	60	<1	4	2
B2 Foundations/Concrete Pours 2025	9	59	60	<1	4	2
B2 Building Construction 2025	2	13	33	<1	2	1
B2 Architectural Coating 2025	35	1	6	<1	<1	<1
B2 Paving 2025	<1	1	10	<1	<1	<1
Overlapping Sub-Phases						
Demolition (B1), Site Preparation (B1) – 2023	1	9	44	<1	1	<1
Site Preparation (B1), Grading/Excavation (B1) – 2023	2	33	57	<1	4	1
Drainage/Utilities/Trenching (B1), Demolition (B2) – 2023	1	10	42	<1	1	<1
Foundations/Concrete Pours (B1), Demolition (B2) – 2023	7	54	79	<1	4	2
Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2) – 2023	8	58	102	<1	4	2
Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2) – 2023	9	87	125	<1	7	3
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2023	10	92	124	<1	8	4
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2024	10	90	123	<1	8	4

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
Building Construction (B1), Grading/Excavation (B2) – 2024	3	45	80	<1	5	2
Building Construction (B1), Drainage/Utilities/Trenching (B2) – 2024	1	10	29	<1	1	<1
Building Construction (B1), Foundations/Concrete Pours (B2) – 2024	10	68	82	<1	5	3
Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2) – 2024	22	68	89	<1	5	3
Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2) – 2024	23	72	106	<1	5	3
Foundations/Concrete Pours (B2), Building Construction (B2) – 2025	10	72	92	<1	5	3
Building Construction (B2), Architectural Coating (B2) – 2025	37	13	38	<1	2	1
Building Construction (B2), Architectural Coating (B2), Paving (B2) – 2025	38	15	48	<1	2	1
Maximum Daily Emissions	38	92	125	<1	8	4
SCAQMD Thresholds of Significance	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

NOTES: B1= Building 1; B2 = Building 2.

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

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

SOURCE: ESA, 2022.

The Project's mitigated regional overlapping construction and operational emissions are summarized in **Table 4.2-10,** *Estimated Maximum Mitigated Regional Operational Emissions in 2025 and Construction Emissions in 2025 (pounds per day)*. The Project would result in potentially significant overlapping construction and operational regional NO_X emissions above the regional significance thresholds. Mitigation Measures AQ-MM-1 would be required to reduce overlapping construction-related NO_X emissions that would be concurrent with the partial buildout regional operational emissions. In addition, there are no feasible mitigation measures to reduce operational source emission of NO_X. With implementation of feasible mitigation, regional emissions from overlapping construction and operations would remain above the regional significance threshold for NO_X. As shown in Table 4.2-10, the mitigated construction emissions in 2025 (i.e., when construction would overlap with operations) would by itself exceed the operational emissions threshold. Mitigation Measures AQ-MM-1 already includes the most stringent emissions standards adopted by the State (i.e., Tier 4 Final emissions standards). CARB staff is in the process of developing potential amendments to the off-road diesel engine standards, in what is referred to as the Tier 5 rulemaking, which is intended to NO_X and particulate matter emissions from new, off-road compression-ignition engines compared to the adopted Tier 4 Final emission standards.

However, CARB has not formally drafted any proposed amendments nor initiated the formal rule-making process. CARB anticipates to bring a proposal to the CARB Governing Board in 2024 and anticipates implementation of the Tier 5 standards for new equipment in 2028. This timeline renders the potential use of Tier 5 equipment as infeasible. There are no feasible mitigation measures that would reduce the overlapping construction and operational emissions to below the operational significance threshold. Therefore, short-term and temporary impacts related to regional NO_X overlapping construction and operations emissions would be significant and unavoidable after implementation of feasible mitigation measures.

TABLE 4.2-10
ESTIMATED MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS IN 2025 AND CONSTRUCTION EMISSIONS IN 2025 (POUNDS PER DAY)[a]

Source	VOC	NO_X	CO	SO2	PM10	PM2.5
Project Emissions						
Area (Consumer products, Landscaping)	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	0	0	0	0	0	0
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Mobile	4	5	34	<1	4	1
Operational Emissions from Building 1 – 2025	8	5	36	<1	4	1
Mitigated Construction Emissions – 2025	38	72	92	<1	5	3
Overlap of Operational and Construction Emissions – 2025	45	77	128	<1	9	4
Operational Emissions from Existing Culver City Parcel Operations (Storage)	<1	<1	1	<1	<1	<1
NET Operational and Construction Emissions – 2025	**45**	**77**	**128**	**<1**	**9**	**4**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Exceeds Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

SOURCE: ESA, 2022.

As expressed in the *amicus curiae* brief submitted for the Friant Ranch Case, the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status, they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have.[59,60] Therefore, just because a project exceeds the mass regional emissions threshold (i.e., pounds per

[59] SCAQMD, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

[60] SJVAPCD, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

day NO_X thresholds) from project-related activities does not necessarily indicate that a project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

As previously stated, meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NO_X or VOCs emissions from local level (project-level). Notwithstanding these scientific constraints, the disconnect between project-level NO_X emissions and ozone-related health impacts cannot be bridged at this time. However, given that NOx emissions during the overlap of construction and operational emissions exceed the SCAQMD's operational regional significance threshold, it cannot be stated for certain that health impacts would not occur. Therefore, impacts are potentially significant with mitigation.

Operation

As noted above, Project impacts regarding operational regional air quality from full Project buildout in 2026 would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold AIR-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis

Localized Emissions

Construction

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology*.[61] The screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine localized construction emissions thresholds for the Project. The maximum daily localized construction emissions for the Project were estimated for each construction phase and analyzed using screening criteria applicable to a 4.46-acre site in the SCAQMD SRA 2 (Northwest Coastal LA County) with sensitive receptors located 25 meters away, which accounts for all adjacent off-site sensitive receptors.[62] The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table 4.2-11,** *Estimated Maximum Unmitigated Localized Construction Emissions (pounds per day).* The Project's maximum localized operational emissions would be below the localized significance

[61] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008. Referenced for Source Receptor Area 2 (Northwest Los Angeles County Coastal) for a 4.46-acre site interpolating from LST values from 1-acre and 5-acre sites.

[62] SCAQMD, Final Localized Significance Threshold Methodology, "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.", June 2003 and revised July 2008, p. 33.

thresholds, and localized construction emissions impacts to existing sensitive receptors would be less than significant.

TABLE 4.2-11
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS
(POUNDS PER DAY) [a]

Source	NO_X	CO	PM10[b]	PM2.5[b]
Construction Phases				
B1 Demolition 2023	20	23	2	1
B1 Site Preparation 2023	14	15	1	1
B1 Grading/Excavation 2023	19	20	1	1
B1 Drainage/Utilities/Trenching 2023	3	5	<1	<1
B1 Foundations/Concrete Pours 2023	43	39	2	2
B1 Building Construction 2023	14	15	1	1
B1 Foundations/Concrete Pours 2024	43	39	2	2
B1 Building Construction 2024	13	15	1	1
B1 Architectural Coating 2024	4	6	<1	<1
B1 Paving 2024	10	14	<1	<1
B2 Demolition 2023	25	30	3	1
B2 Site Preparation 2023	17	20	1	1
B2 Grading/Excavation 2023	28	31	1	1
B2 Grading/Excavation 2024	26	31	1	1
B2 Drainage/Utilities/Trenching 2024	4	6	<1	<1
B2 Foundations/Concrete Pours 2024	57	52	2	2
B2 Foundations/Concrete Pours 2025	56	52	2	2
B2 Building Construction 2025	19	20	1	1
B2 Architectural Coating 2025	3	5	<1	<1
B2 Paving 2025	6	9	<1	<1
Overlapping Phases				
Demolition (B1), Site Preparation (B1) – 2023	34	38	2	2
Site Preparation (B1), Grading/Excavation (B1) – 2023	33	35	2	1
Drainage/Utilities/Trenching (B1), Demolition (B2) – 2023	28	35	3	2
Foundations/Concrete Pours (B1), Demolition (B2) – 2023	68	69	5	3
Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2) – 2023	85	89	6	4
Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2) – 2023	88	90	4	4

Source	NO_x	CO	PM10[b]	PM2.5[b]
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2023	85	84	4	4
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2024	82	84	4	3
Building Construction (B1), Grading/Excavation (B2) – 2024	39	46	2	2
Building Construction (B1), Drainage/Utilities/Trenching (B2) – 2024	17	21	1	1
Building Construction (B1), Foundations/Concrete Pours (B2) – 2024	70	67	3	3
Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2) – 2024	74	73	3	3
Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2) – 2024	84	87	4	4
Foundations/Concrete Pours (B2), Building Construction (B2) – 2025	75	72	3	3
Building Construction (B2), Architectural Coating (B2) – 2025	22	25	1	1
Building Construction (B2), Architectural Coating (B2), Paving (B2) – 2025	28	34	1	1
Maximum Daily Emissions	88	90	6	4
SCAQMD Thresholds of Significance [c]	208	1404	12	6
Exceeds Thresholds?	**No**	**No**	**No**	**No**

NOTES: B1= Building 1; B2 = Building 2.

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

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

SOURCE: ESA, 2022.

Operation

The localized operational air quality analysis was conducted using the methodology prescribed in the SCAQMD Localized Significance Threshold Methodology.[63] The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions numerical indicators of significance for the Project. The Project would comply with the Title 24 (2019) building energy efficiency standards, CALGreen Building Code, the Culver City Mandatory Green Building Program, and City of Los Angeles Green Building Code. The maximum daily localized emissions and the localized significance thresholds are presented in **Table 4.2-12,** *Estimated Maximum Localized Operational Emissions – Project (pounds per day).* The Project's maximum localized operational emissions would be below the

[63] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

localized significance thresholds, and localized operational emissions impacts to existing sensitive receptors would be less than significant.

TABLE 4.2-12
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS – PROJECT (POUNDS PER DAY) [a]

Source	NO_x	CO	PM10	PM2.5
Area (Consumer Products, Landscaping)	<0.1	<0.1	<0.1	<0.1
Energy (Natural Gas)	2.0	1.7	<1.0	<1.0
Stationary (Emergency Generator)	0.3	2.2	<1.0	<1.0
Total Localized (On-Site) Emissions	**2.2**	**4.1**	**<1.0**	**<1.0**
SCAQMD Screening Significance Thresholds b	**208**	**1404**	**3**	**2**
Exceeds Screening Significance Thresholds?	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

[b] The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Los Angeles County Coastal) for a 4.46-acre site with sensitive receptors with the nearest sensitive receptor within 25 meters from the Project Site.

SOURCE: ESA, 2022.

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown previously in Table 4.2-3, above, CO levels in the Project area are substantially below the federal and the State standards. Maximum CO levels in recent years (2018-2020) were 2.0 ppm (one-hour average) and 1.2 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin since 2003,[64] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

As noted above, the 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis,

64 SCAQMD, Final 2016 AQMP, March 2017, p. 2-38.

and impacts would be considered less than significant. Based on the Project's Transportation Impact Study,[65] under Horizon Year plus Project (2045) conditions, the intersection of Venice Boulevard and S. Robertson Boulevard would have a traffic volume of approximately 64,950 average daily trips (ADT),[66] which is below the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Venice Boulevard and S. Robertson Boulevard intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. In addition, CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP primarily due to ongoing fleet turnover of older on-road light duty vehicles and use of cleaner fuels. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014. Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The Project off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Toxic Air Contaminants

Construction

Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase of the Project. According to OEHHA and the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,[67] health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (approximately 35 months), the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of Project construction. Additionally, SCAQMD's CEQA guidance does not require a health risk assessment for short-term construction emissions. It is, therefore, not necessary to quantitatively evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration.

The Project Site is not located within 500 feet of a freeway, 1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future Project occupants. In addition, the Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel

65 Fehr & Peers, Crossings Campus Project Transportation Impact Study, Appendix D, July 2022. Provided as Appendix M of this Draft EIR.

66 The traffic volume of approximately 64,950 ADT was estimated based on the peak hour intersection volumes under Horizon Year with Project conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art (2.0 Standard Approaches, http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

67 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction. Based on the short-term duration of Project construction and compliance with regulations that would minimize emissions, construction of the Project would not expose sensitive receptors to substantial TAC concentrations.

Furthermore, as discussed in Threshold AIR-2, the Project would be required to implement Mitigation Measure AQ-MM-1 to reduce regional NO_X emissions. The mitigation measure would have co-benefits of reducing emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment (refer to Table 4.2-9, above), further reducing the TAC emissions during construction activities. Therefore, impacts from TACs during construction would be less than significant.

Operations

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[68] The Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Furthermore, Project trucks would be required to comply with the applicable provisions of 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NO_X emissions from existing diesel trucks. Therefore, Project operation would not be considered a substantial source of DPM.

With respect to the use of consumer products and architectural coatings, the office uses associated with the Project would be expected to generate minimal TAC emissions from these sources. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program (CalARP).

As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, operation of the Project would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant.

Mitigation Measures

Construction

Impacts regarding localized construction air quality emissions were determined to be less than significant. Therefore, no mitigation measures are required.

[68] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

Operations

Impacts regarding localized operational air quality emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during construction were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Operations

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold AIR-4: Would the Project result in other emissions (such as those leading to odors) affecting a substantial number of people?

As discussed in the Initial Study (Appendix A), the Project would not create objectionable odors affecting a substantial number of people. 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. Thus, the Project would have no impact with respect to Threshold AIR-4 and no further analysis is required.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, of this Draft EIR provides a list of 52 related projects that are planned or are under construction within an approximately 1.5-mile radius of the Project Site. Of the 52 related projects, 34 are located within the City of Culver City and 18 are located within the City of Los Angeles. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[69] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution

69 SCAQMD, CEQA Air Quality Handbook, p. iii.

thresholds established by the District."[70] The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[71]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Both the City of Culver City and the City of Los Angeles utilize the SCAQMD thresholds. Therefore, if the Project exceeds any SCAQMD's recommended daily thresholds for project-specific impacts, it would be considered to cause a cumulatively considerable increase in such emissions for those pollutants for which the Air Basin is in non-attainment.

Construction

As set forth above, the Project's construction emissions would be below the applicable project-specific significance thresholds, except for regional NOx emissions during construction. Mitigation Measure AQ-MM-1 would reduce such emissions to below the significance threshold, and impacts would be less than significant after mitigation. As such, the Project's contribution to cumulative regional or local impacts to air quality during construction would not be cumulatively considerable, and cumulative impacts would be less than significant with implementation of Mitigation Measure AQ-MM-1.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events; therefore, construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require a health risk assessment for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative toxic emission impacts during construction would be less than significant.

As discussed above, there would be an overlap of construction and operations in 2025. As shown in Table 4.2-10, the Project would result in potentially significant overlapping construction and operational regional NO_X emissions above the regional significance thresholds. Therefore, there would also be a cumulatively considerable net increase of NO_X emissions, which would result in a significant and unavoidable cumulative impact. As discussed above in Threshold AIR-2, given that

[70] SCAQMD, CEQA Air Quality Handbook, p. 6-1.
[71] SCAQMD, Cumulative Impacts White Paper, Appendix D.

NO_X emissions during the overlap of construction and operational emissions exceed the SCAQMD's operational regional significance threshold, it cannot be stated for certain that health impacts would not occur. Therefore, impacts are potentially significant with mitigation.

Operations

As discussed above, the Project's regional operational air quality emissions, localized emissions and TACs would be less than significant. According to SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. As operational emissions did not exceed any of SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by project operation would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any of the 52 related projects (which are largely residential, retail/commercial, and office in nature), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. However, the related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and thus, would not contribute to a cumulative impact.

Mitigation Measures

Construction

Refer to Mitigation Measure AQ-MM-1 to reduce cumulative regional NO_X emissions during construction. No additional mitigation measures are required.

Refer to Mitigation Measure AQ-MM-1 to reduce cumulative regional NO_X emissions during the overlap of construction and operation. As discussed above in Threshold AIR-2, no additional mitigation measures are feasible.

Operations

Cumulative impacts regarding operational air pollutant emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

Implementation of Mitigation Measure AQ-MM-1 would reduce regional NO_X emissions to below applicable significance threshold. Cumulative air quality impacts would be less than significant with mitigation. Therefore, no additional mitigation measures are required or included, and the impact level would remain less than significant with mitigation.

Cumulative impacts regarding overlapping construction and operational air pollutant emissions were determined to be significant and unavoidable. Implementation of Mitigation Measure AQ-MM-1 would be required. No other feasible mitigation measures are feasible.

Operations

Cumulative impacts regarding operational air pollutant emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.3 Cultural Resources

4.3.1 Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to State and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. The analysis of historical resources is based on the *Crossings Campus, Culver City and Los Angeles, California, Historic Resources Assessment* (Historical Report) prepared by Environmental Science Associates (ESA) and dated July 2022. The analysis of archaeological resources is based on the *Crossings Campus, Culver City and City of Los Angeles, California, Archaeological Resources Assessment Report* (Archaeological Resources Report) prepared by ESA and dated July 2022. The Historical Report and Archaeological Resources Report are provided within Appendix C and Appendix D, respectively, of this Draft EIR.

4.3.2 Environmental Setting

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws governing and influencing the identification and preservation of cultural resources of national, State, regional, and local significance include:

- National Historic Preservation Act and National Register of Historic Places
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- Culver City General Plan
- Culver City Preservation Ordinance
- Los Angeles General Plan – Conservation Element
- West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles Cultural Heritage Ordinance
- Los Angeles Historic Preservation Overlay Zone Ordinance
- Los Angeles Historic Resources Survey (SurveyLA)

Regulatory Framework

Federal

National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment".[1] The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[2]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."[3]

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.[4]

1 36 Code of Federal Regulations (CFR) 60.

2 United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

3 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 5.

4 United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

A resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the National Historic Preservation Act.

Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.[5]

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific property or site is understood and its meaning is made clear."[6] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[7] The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the

[5] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 8.

[6] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pp. 7 and 8.

[7] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 44.

retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.[8] Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.[9] The full list of Criteria Considerations is provided below:

A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or

D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or

G. A property achieving significance within the past 50 years, if it is of exceptional importance.

Secretary of Interior's Standards for the Treatment of Historic Properties

The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply

[8] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 25.

[9] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 41.

specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.[10]

It is important to note that the Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

[10] United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the State and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, 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.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.[11] If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological

[11] California Public Resources Code Section 21083.1(a).

resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.[12]

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."[13] According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.[14]

California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[15] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[16] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

12 CEQA Guidelines, Section 15064.5(c)(4).
13 CEQA Guidelines, Section 15064.5(b)(1).
14 CEQA Guidelines, Section15064.5(b)(3).
15 California Public Resources Code, Section 5024.1[a].
16 California Public Resources Code, Section 5024.1[b].

2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code

PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological

standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Local

City of Culver City

Culver City Historic Preservation Ordinance

The City enacted a Historic Preservation Ordinance in 1991 which defines Cultural Resources. The Historic Preservation Ordinance (Chapter 15.05 of the City's Municipal Code [CCMC]) is administered through the City's Community Development Department by Cultural Affairs.[17] The Ordinance outlines a designation process, criteria, and procedures for altering or modifying designated Cultural Resources. Pursuant to the City's Ordinance, a Cultural Resource is a property that has aesthetic, cultural, architectural or historical significance to the city, State, or nation, and may have been designated as a Landmark Structure, Significant Structure, or Recognized Structure. After satisfying at least one of the threshold criteria, classification is based on a ranking system, currently outlined in Resolution No. 91-R015.

A **Landmark Structure** is defined as a structure designated as an exceptional example of the highest architectural, historical, or cultural significance of the community. A Landmark structure or district may be designated without owner consent.

A **Significant Structure** is defined as a structure designated as being of substantial architectural, historical, or cultural significance to the community. If residential, a "Significant" structure or district shall be designated with written consent of the owner, provided that the consent of only a majority of the owners shall be required for a "Significant District" designation. Once the designation has been made and the designation document has been filed for recondition, owner consent is irrevocable. If the owner consent is not obtained, a residential structure or district may be designated "Recognized." If nonresidential, a structure may be designated without owner consent.

All structures with "Landmark" or "Significant" designations are required to display a plaque identifying that building or district as either "Landmark" or "Significant."

[17] City of Culver City, Culver City Municipal Code, Chapter 15.05 Historic Preservation Program.

A **Recognized Structure** is defined as a structure designated as being of architectural, historical, or cultural interest. A structure or district may be designated as "Recognized" without the consent of the owner. No other requirements apply to Recognized structures.

The Ordinance also identifies historic districts as falling into one of three different types: a "Landmark District," a "Significant District," or a "Recognized District," with similar criteria for designation for each one. A historic district is described as a designated area consisting of one (1) or more contiguous parcels improved with structures at which events occurred that made a significant contribution to the city, State, or national history or culture, or an area that contains structures that are collectively significant examples of period, style, or method of construction that provide distinguishing characteristics of the architectural type or period represented.

In Section 15.02.020 of the CCMC, the Culver City Historic Preservation Ordinance establishes criteria for designating local historical resources and districts as Cultural Resources. To be considered for designation, a structure must be at least fifty (50) years old and the exterior of the structure is accessible or visible to the public, or the structure or district has special importance to the City.

A. Threshold criteria. To be considered for designation, the structure(s) must meet one of the following criteria:
    1. The structure(s) is at least fifty (50) years old and the exterior of the structure is accessible or visible to the public; or
    2. The structure or district has special importance to the City.
B. Assessment criteria. After satisfying the threshold criteria, a structure or district shall be reviewed for compliance with one or more of the following criteria, as defined under CCMC Section 15.05.010 of this Chapter:
    1. Is the structure(s) of "architectural significance"?
    2. Is the structure(s) of "historical or cultural significance"?
    3. Do the structures in the district collectively meet 1. or 2. above?

Culver City General Plan

The City's General Plan does not include policies, goals, and objectives for cultural resources; however, the City is currently preparing a General Plan update that will consider cultural resources.

City of Los Angeles

Los Angeles General Plan – Conservation Element

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification

activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.[18]

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Historic Preservation Overlay Zone (HPOZ)

West Adams–Baldwin Hills–Leimert Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The West Adams–Baldwin Hills–Leimert Community Plan consists of six goals aimed to tailor citywide preservation policies established through the General Plan and assist the Office of Historic Resources in further instructing policy decisions through implementation of the Cultural Heritage Master Plan as well as through the data findings of the Los Angeles Historic Resources Survey (SurveyLA). In addition to outlining goals and policies regarding the review and designation of future historic resources, the intention of the Community Plan is also to outline policies that identify innovative programs that encourage neighborhood conservation.[19] These goals are as follows:

> Goal LU68: A community that recognizes its historic and cultural heritage by encouraging continued designation, preservation and restoration of the monuments, cultural resources, neighborhoods and landmarks of the area for the benefit of future generations.
>
> Goal LU69: A community where careful consideration of applicable preservation criteria is encouraged when reviewing projects affecting designated and eligible historic resources.
>
> Goal LU70: A community where new Historic Preservation Overlay Zones (HPOZ) are initiated and adopted for neighborhoods that have been identified and/or appear to be eligible for historic district status.
>
> Goal LU71: A community that protects and enhances historic and architectural resources in commercial areas in a manner that will encourage context sensitive revitalization and investment in these areas.

[18] City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.

[19] Los Angeles Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, 3-107.

Goal LU72: A community where partnerships with relevant neighborhood organizations and City agencies are forged to advance preservation efforts in the community through informational/educational and incentive programs.

Goal LU73: A community where the contribution of existing cultural resources is enhanced and capitalized upon.

Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating an HCM. The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that a HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. The criteria for HCM designation are stated below:

- The proposed HCM is identified with important events of national, State, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, State, city, or community is reflected or exemplified; or
- The proposed HCM is associated with the lives of with historic personages important to national, State, city, or local history; or
- The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.[20]

A proposed resource may be eligible for designation if it meets at least one of the criteria above. When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the CHC and OHR staff often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a "master" architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained "integrity"? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects

[20] City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by State or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Checklist, as specified in Section 19.05 of the LAMC. If the Initial Study and Checklist identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure." [21]

Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; most recently, this ordinance was amended in 2017. Angelino Heights became Los Angeles' first HPOZ in 1983. The City currently contains 35 HPOZs. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.[22] Each HPOZ is established with a Historic Resources Survey, a historic context statement, and a preservation plan. The Historic Resources Survey identifies all Contributing and Non-Contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing Elements are defined as any building, structure, Landscaping, or Natural Feature identified in the Historic Resources Survey as contributing to the Historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the Alterations are determined reversible by the Historic Resources Survey.[23] For CEQA purposes, Contributing Elements are treated as contributing features to a historic district, which is the historical resource. Non-Contributing Elements are any building, structure, Landscaping, Natural Feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, Non-Contributing Elements are not treated as contributing features to a historical resource.

Los Angeles Historic Resources Survey (SurveyLA)

The City of Los Angeles Historic Resources Survey (SurveyLA) is a Citywide survey that identifies and documents potentially significant historical resources representing important themes in the

[21] City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.
[22] City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.
[23] City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

City's history. The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's OHR. The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010 to 2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by the Community Redevelopment Agency of the City of Los Angeles. All tools, methods, and criteria developed for SurveyLA were created to meet State and federal professional standards for survey work.

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, State, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes that include property owner notification and public hearings.

Existing Conditions

Historical Resources

The Project Site is an irregularly shaped parcel, located on a corner lot bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and commercial uses to the east. The Project Site is currently improved with single-story 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, street edge, and building perimeter planting.

There is a jurisdictional boundary between Culver City and Los Angeles that runs through the Project Site. For purposes of this analysis, the three existing buildings on the Project Site are referred to as LA-1, CC-1, and CC-2, as shown in **Figure 4.3-1**, *Existing Buildings on Project Site*. LA-1 is located on the Los Angeles Parcel, and it encompasses the entirety of the northern portion of the Project Site and into the southern portion on the east side. While most of the building was constructed at one time, LA-1 contain three distinct addresses with unique entrances: 8883, 8884–8888 Venice Boulevard are labelled LA-1a; 8876 Venice Boulevard is labelled LA-1b; 8827–8829 National Boulevard is labelled LA-1c. CC-1 and CC-2 are located on the Culver City Parcel. CC-1 faces north from the southwest corner of the Project Site and CC-2 faces south onto Washington Boulevard in the southeastern corner of the Project Site.

The study area for this analysis of historical resources, a 0.25-mile radius, is primarily comprised of commercial and residential land uses. Land located to the north of the Project Site (across Venice Boulevard) include a two story office building and single-family residences, the Helms Bakery Complex to the east (single-story warehouses and retail buildings), the adjacent 8777 Washington four-story office building followed by 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 (office, residential, hotel, and retail uses) to the west across National Boulevard.

Historical Background of the Project Site

LA-1 is in located in the Frank Partenico Place tract in Los Angeles. CC-1 and CC-2 are in Tract 1778 in Culver City. The land on which the Project Site sits was part of the *Clemente Cruz de Coronel Property* within the *Rancho Rincon de los Bueyes,* a 3,127-acre land grant first given to Bernardo Higuera and Cornelio Lopez by Pablo Vicente de Solar who was the Spanish Governor of Alta California in 1821.[24] Over time, this land was divided and then subdivided by various owners; Tract 1778 was recorded with this name on April 3, 1913, by Knapp & Woodward, Civil Engineers. At the time of this recordation, the tract was owned by the Palms Investment Company.[25]

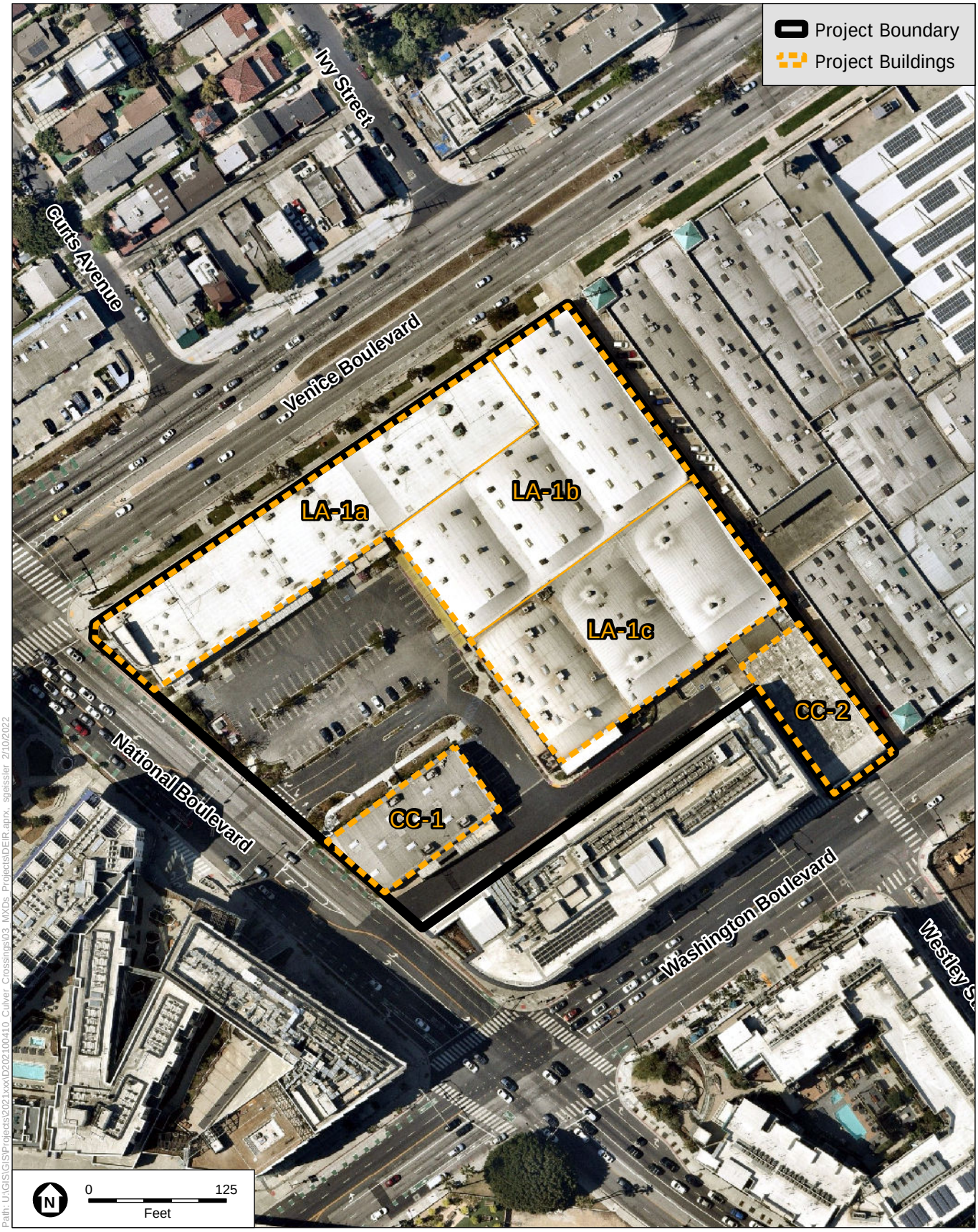
The Project Site remained undeveloped until 1924. That year, there was sparse development on the site with a small gasoline and oil structure on its southeast corner and two small sheds at the northeastern corner of the site. On the southwest corner of the site (Culver City) was a two-story structure called The Green Mill which featured a round three-foot deep concrete pool and a restaurant and club for dining and dancing. It is unknown whether the two-story structure had a basement. The remainder of the lot was undeveloped.

In 1929, the building on the Project Site had been renamed the Cotton Club Roadhouse. This building was a significant local restaurant, social club, and music venue, called several names throughout the years, including the Green Mill, Casa Manana, Meadowbrook, Zuccas Opera House and Mardi Gras. The venue remained in operation until February 1950, when it burnt down.[26]

[24] Cheviot Hills History, N.D, The Spanish and Mexican Ranchos, https://www.cheviothillshistory.org/spanish-mexican-ranchos. Accessed July 12, 2022.

[25] Los Angeles County Department of Public Works, Map TR0022-044B, Tract No. 1778.

[26] Evening Vanguard, Fire Destroys Zucca's Today, February 20, 1950.



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SOURCE: Nearmap, 2021

Crossings Campus

Figure 4.3-1
Existing Buildings on Project Site

ESA

By 1954, the lot had changed dramatically. LA-1, CC-1, and CC-2 had been constructed and the Project Site's configuration resembled its present configuration. In addition to LA-1, CC-1, and CC-2, there was a car dealership and lot at the current location of 8777 Washington Boulevard (not part of the Project Site). None of these buildings appear to have a basement associated with them.

By 1964, CC-2 connected directly to LA-1. Otherwise, the lot's configuration and the buildings' footprints remained consistent. The footprint of all buildings on the lot remained consistent from 1970 to 2012. Changes to the footprint of the buildings on the Project Site occurred between 2012 and 2016 when the loading dock at the southern rear of LA-1 was demolished to make room for parking and the western section of LA-1 was demolished.

Between 2016 and 2021, the lot again changed dramatically. The building at the southern end of the lot (8771 Washington Boulevard; not part of the Project Site) had been constructed. Additional changes to the lot include the reconfiguration and re-landscaping of the parking area on the northeast corner of the lot, as well as the demolition of the east rear portion of CC-1, that connected the structure to LA-1.

LA-1 (8876 and 8883 Venice Boulevard, 8884–8888 Venice Boulevard, and 8827–2289 National Boulevard)

Historical Background

LA-1 was constructed as a single building but has three sections (see Figure 4.3-1) with distinct legal addresses in 1951. The property was originally constructed as a warehouse and manufacturing building with supplemental offices for the Dohrmann Hotel Supply Company. Its use since its original construction has largely remained the same, with commercial businesses and storage occupying the building today.

LA-1 was originally constructed for the Dohrmann Hotel Supply Company, founded by Frederick W. Dohrmann (1842–1914) and his business partner, Bernhard Nathan. The partners began by selling crockery and china in 1868. Over the next nearly 40 years, the partners' profile expanded, and they formed the Dohrmann Commercial Company. The Dohrmann Hotel Supply Company, which operated under the parent company of the Dohrmann Commercial Company, was founded as a wholesale operation, selling imported crystal, china, and flatware to hotels and resorts throughout the United States. After Dohrmann's death in 1914, the company continued to operate and expand.[27] The company was based in San Francisco, but had facilities and stores in many locations throughout the United States. The business continued to operate throughout the 1950s and was purchased by Starrett Corporation in 1961. The company appears to have ceased operations circa 1970.

The architect of LA-1 was the San Francisco-based firm Meyer & Evers, composed of architects Frederick H. Meyer (1876–1961) and Albert John Evers (1888–1977).[28]

[27] Carole Cosgrove Terry, PhD, Frederick William Dohrmann (1842–1914), Immigrant Entrepreneurship, N.D, https://www.immigrantentrepreneurship.org/entries/frederick-william-dohrmann/. Accessed July 12, 2022.

[28] Nancy Hadley, Frederick H. Meyer (1876–1961), American Institute of Architects Historical Directory, December 18, 2018, https://aiahistoricaldirectory.atlassian.net/wiki/spaces/AHDAA/pages/35728413/ahd1030254. Accessed July 12, 2022; Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

Frederick Meyer was born in San Francisco and began his career in the early 1890s as a draftsman. He worked at a few architectural firms throughout the 1890s until he opened his own practice in 1899. Meyer was a prolific architect in San Francisco, designing numerous buildings in the aftermath of the 1906 earthquake and fire. Meyer was a member of the American Institute of Architects and designed public, commercial, industrial projects. Meyer practiced with a variety of partners throughout his career.[29]

Albert John Evers was born in Iowa in 1888. He moved to San Francisco as an adult and began to work as an architect. In the 1920s, Evers had a partnership with George Frederick Ashley under the name Ashley and Evers. Evers was a Fellow of the American Institute of Architects.[30]

It is unclear exactly when the partnership between Meyer and Evers began, although the partners appeared to complete the bulk of their work, which appeared to primarily consist of utilitarian warehouses, distribution centers, and manufacturing buildings, in the 1950s. Although both Frederick Myers and John Evers were significant architects in their own rights, particularly in the San Francisco area where the majority of their buildings were constructed, LA-1 is not an exceptional example of either man's work, nor is it an exceptional example of their work as partners.

Architectural Description

LA-1 has an L-shape footprint with precast concrete walls. The building faces Venice Boulevard to its north, National Boulevard to the west and the Helms Bakery Complex to the east. The portion along Venice Boulevard has a flat roof spanning from west to east; the rest of the building has a series of three semicircular vault roofs that span from west to east. The lot on which LA-1 sits has a central interior parking lot on its west side and concrete walkways, grass, trees, and plantings.

The north elevation spans the entire width of the northern lot boundary. The northeast portion of the elevation is divided into three bays, with a central bay with a vaulted ceiling and a façade constructed of nine divided-lite windows. The eastern bay is devoid of any fenestration, while the western bay has a door.

The other portion of the north elevation is asymmetrical. This elevation is entirely new material and design; the original warehouse front was removed in 2017–2018 and the current façade was added in its place. The eastern end of the elevation contains a series of plate glass windows in aluminum frames in a variety of sizes and configurations, while the western end features vertical white and black lines that run down from the roofline approximately one-third of the way down the wall. These lines are of differing widths and placed at irregular intervals to form a decorative pattern. Non-original lights have been installed across the elevation and a low hedge extends across most of the elevation's width.

[29] University of California Berkeley: Environmental Design Archives, N.D, Frederick H. Meyer Collection, 1904–1962, finding aid and biography via Online Archive of California, https://oac.cdlib.org/findaid/ark:/13030/tf809nb36t/admin/. Accessed July 12, 2022.

[30] Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

The western elevation facing National Boulevard has a rounded corner. Most of the western elevation is single story, but the middle section is a faux façade that is three stories high.

The south elevation continues the same design as the north elevation, with minimal fenestration and decorative white lines of applied moldings descending from the roofline. On the west end of the elevation, sits a recessed corner entrance composed of a glass double door in an aluminum frame. There is a recessed non-original entrance on the east side of the elevation and nine-lite aluminum frame windows to the east of this door and one to the west.

The primary western elevation of LA-1 has the main entrance to LA-1 at the north. This section has a row of eight fixed-pane, two-lite windows with aluminum frames and eight smaller four-lite rectangular windows in aluminum frames above. To the south of this row of windows is a recessed entrance to LA-1, which is clad in wood and with wood door. To the south of the entrance are two additional fixed-pane, plate-glass windows with four-lite rectangular windows above.

To the south is an entrance for LA-1. A projecting entry bay contains a recessed single-leaf door. There is a plate-glass window on the south side of this elevation. The remainder of the elevation is two-stories tall and has three plate-glass windows on the first and second floors. There is a taller rectangular volume at the southwest corner of the elevation. This portion of the building used to be attached to CC-1, but the connection was demolished in 2017.

The south elevation is constructed almost entirely of new materials and has been significantly altered. There is a rectangular concrete volume with a two-lite vertical rectangular window at the southwest corner of the elevation. A flight of concrete stairs leads to an outdoor covered patio (non-original). On the east side of the elevation is an aluminum frame entrance door surrounded by three windows. There is also a large opening for loading and unloading. The remainder of the elevation is unornamented and connects to a one-story volume painted orange, accessible via a flight of concrete stairs that attaches LA-1 with CC-2.

The east elevation of the building is unornamented concrete with two door openings. There are no fenestration openings or any decorative detailing. The elevation faces the Helms Bakery Complex to the east and overlooks an alleyway between the two structures.

CC-1 (8825 National Boulevard)

Historical Background

CC-1 was originally constructed in 1954 as a warehouse and retail space and was originally connected to LA-1 until the connection was demolished in 2017. The architect, builder, or contractor of the building is unknown, but it does not appear to have been designed by a master architect or firm. At the time of its construction, it was built to provide space for a restaurant equipment supply company called MFG Restaurant Equipment. It was subsequently occupied by a range of businesses, including retail, advertising organizations, and publishing companies.

Architectural Description

CC-1 is a rectangular building situated on the west side of the Project Site. The building sits directly east of National Boulevard. The structure is simple and utilitarian with limited ornamentation, a rectangular footprint, and flat roof. It is constructed of concrete that has been painted on the north

and south façades. CC-1's west façade is three bays wide with a symmetrical pattern of three decorative (non-original) windows. The northernmost window features a glass door in an aluminum frame that is built into the window (non-original).

CC-1's north elevation has been remodeled extensively. The main entry is centered on the elevation and is accessible via a flight of concrete stairs that lead to a small non-original concrete porch. The front entrance is a non-original double door of glass with an aluminum surround and a rectangular glass transom; it is flanked by a column of six rectangular windows on either side. There are horizontal rectangular window composed of three six-lite windows to the east and west of the front entrance and another identical window on the west end of the elevation (all non-original).

CC-1's east elevation has minimal original material, as a connection to LA-1 was demolished in 2017. The east elevation is curved and supported with large metal beams in a zig-zag pattern. CC-1's south elevation is uninterrupted concrete with no fenestration or decorative detailing. Most of the elevation is dominated by a large loading dock, covered with a metal awning supported by metal columns.

CC-2 (8771 Washington Boulevard)

Historical Background

CC-2 was originally constructed in 1954. The original architect, if any, is unknown. The building was used as a garage or additional service building for the car dealership (demolished) that was located to its immediate west. At this time, many automobile service buildings and car lots were built on Washington Boulevard. Since the demolition of the adjacent car dealership, CC-2 has served as a storage building and a retail store.

Architectural Description

CC-2 is simple and utilitarian with no ornament or decorative detailing. The one-story, wood-frame building has a rectangular footprint, a flat roof and is constructed of painted concrete brick. The primary (south) façade facing Washington Boulevard has a non-original door located on the east side of the main façade. To the east of the main entrance is a rectangular 21-lite window in an aluminum frame. The brick on the front façade is painted white and features a line of stretcher bricks near the roofline that have been painted a contrasting grey. The line of painted stretcher bricks on the south façade rounds the corner to the east elevation, which inverses the paint colors of the south façade. The east elevation, which faces an alleyway and the neighboring Helms Bakery Complex, has no fenestration or additional detail; it is uninterrupted coated brick.

The building's west elevation is largely obscured from the public right-of-way. The elevation is uncoated brick. Part of the northern end of the elevation is exposed and features a single-leaf grey metal door at its northern end. A non-original, one-story addition connects CC-2 to LA-1 to its direct north. The north elevation of CC-2 is unornamented brick and is obscured from view.

Historic Resources Identified on Project Site

None of the buildings on the Project Site have been identified in any previous surveys. LA-1, CC-1, and CC-2 are not documented in the State's Built Environment Resources Database (BERD) system, SurveyLA, or in the historic resources survey report for the West Adams–Baldwin Hills–

Leimert Community Plan Area. CC-1 and CC-2 were not identified in Culver City's 1990 Historic Preservation Advisory Committee Report or any of its subsequent updates. Per the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC) record search, no previously identified historical resources are located on the Project Site.

Historic Resources Identified within 0.25-mile of the Project Site

Methodology

A records search was conducted on October 29th, 2021, through BERD. The records search included a review of all previously documented historic architectural resources and studies on or within a 0.25-mile radius of the Project Site. SurveyLA was also reviewed to find additional resources within a 0.25-mile radius of the Project Site, as well as the 1990 Culver City Historic Preservation Advisory Committee Report (HPAC) and its subsequent updates, which identified all structures in Culver City that have been classified as "Landmark," "Significant," or "Recognized." In addition, a records search was conducted on December 20, 2021, at the CHRIS-SCCIC housed at California State University, Fullerton. The CHRIS-SCCIC record search provides the basis for an assessment of archaeological resources and covers a 0.50-mile radius but was also used to identify historic architectural resources within the 0.25-mile radius used in this report for consideration of potential indirect impacts on historic resources. A 0.25-mile radius is a standard distance for identifying nearby historic resources in a dense, urban environment that could potentially result in indirect impacts from development projects. The 0.25-mile radius study area is also appropriate here given the development of other properties of varying heights which in effect block views to and from the Project Site to buildings located beyond the 0.25-mile radius. There are five historical resources that have been previously identified within 0.25 mile of the Project Site, and one (the Helms Bakery Complex) that has indirect views of the Project Site. The other resources do not have a direct or indirect view of the Project Site

Results

The records search identified six previously recognized historic resources within 0.25 miles of the Project Site. Of these resources, four are in Los Angeles, one (the Helms Bakery Complex is located both in Los Angeles and Culver City, and one (the eastern boundary of the Santa Monica Air Line Segment) is located in Culver City. The buildings in the Helms Bakery Complex that are in Los Angeles (the Helms Garage and Helms Hall) have been identified in SurveyLA with status codes of 5S3, 3S, 3CS, meaning they appear eligible for the California Register, the National Register, and for local designation through survey evaluation. The buildings in the Helms Bakery Complex located in Culver City (Helms Bakery Building and Beacon Laundry Building) have been identified as a "Landmark Structure" and as a "Significant Structure" respectively in the HPAC report. The Complex is immediately adjacent to the Project Site on the east.

Other historic resources identified within the study area include three single-family residential homes (3380 South Robertson Boulevard; 3373 South Robertson Boulevard; and 3377 South Robertson Boulevard) and a single industrial building (3340 South Robertson Boulevard), all located in Los Angeles. Two of these resources (3340 South Robertson Boulevard and 3377 South Robertson Boulevard) have been assigned status codes of 5S3 and 3Cs, meaning they appear eligible for the California Register and local designation through survey evaluation. The other two properties identified (3380 South Robertson Boulevard and 3373 South Robertson Boulevard) also

appear eligible for the California Register and local designation through survey evaluation, as well as the National Register.

The CHRIS-SCCIC search identified one previously recorded historical resource within 0.25 mile of the Project Site. This resource (P-19-003803) is the eastern boundary of the Santa Monica Air Line Segment, an approximately 6-mile-long railroad line that extends to the west and terminates in Santa Monica. The eastern boundary of this resource is located 440 feet east of the Project Site, and there are no historic buildings associated with the resource. The Department of Parks and Recreation Primary Record Form for this resource, used to document and record survey results, does not include a historic status code. As this resource is a boundary and not a historic structure or site, it will not be included in the impacts analysis.

Significance Evaluations

Due to their proximity to both Los Angeles and Culver City, and due to their related developmental histories, LA-1, CC-1, and CC-2 were all evaluated for listing as a Los Angeles Historic Cultural Monument and for listing on the National Register/California Register under criteria A/1/1, B/2/2, C/3/3, and D/4. LA-1, CC-2, and CC-2 were also evaluated as Culver City Cultural Resources under Threshold Criterion A-1 and A-2 and Assessment Criteria B-1 and B-2.

LA-1 was evaluated under the following historical and architectural contexts from SurveyLA: *Industrial Development, 1850–1980*, *Industrial Identity, 1850–1980*; *Industrial Development, 1850–1980*, *Industrial Architecture, 1850 -1980;* and *Commercial Development, 1850–1980, Commercial Identity, 1920–1980.* LA-1 was also analyzed in the context of *Frank Partenico Place (1913–1960)* and as part of the *West Adams–Baldwin Hills–Leimert Community Plan Area.*

CC-1 and CC-2 were evaluated under same historic contexts from SurveyLA as LA-1. CC-2 was also evaluated under the SurveyLA context *Commercial Development, 1850–1980, Commercial Development and the Automobile*, *1910–1970.* In addition, CC-1 and CC-2 were evaluated within the contexts of *Development and Incorporation of Culver City (1917–1960), Tract 1778 (1913–1960)* and *Culver City Commercial and Industrial Development (1922–1986).*

Criterion A/1/1/B-2: Broad Patterns of History

LA-1

LA-1 was constructed on the border of Los Angeles and Culver City in 1951 to serve as a warehouse, manufacturing facility, and store for the Dohrmann Hotel Supply Company.[31] The company had facilities and stores throughout the country. LA-1 was one of many manufacturing facilities associated with the company and the subject property was not the founding location of the company, which was San Francisco. The building does not have any notable design elements that directly connect it with the Dohrmann Hotel Supply Company.

LA-1 was constructed during a period of neighborhood transition. After World War II, economic priorities and interests shifted, and much of Washington Boulevard was built up with garages, auto sales lots, as well as warehouses and other associated buildings. Similarly, large warehouses and

[31] San Francisco Examiner, Broadway-Hale Sells Unit for $10 Million, November 2, 1961.

industrial buildings were also being built along Venice Boulevard in Los Angeles. LA-1 was a part of this pattern of development and was constructed during this period of evolution.

LA-1, however, has undergone extensive alterations since its original construction and consequently no longer visually conveys this historic pattern of development. The building's entire northern front façade was removed and replaced with a contemporary front for retail stores in 2017–2018. Additional alterations, including the demolition of the building's original dock and canopy at its southern rear in 2015, the demolition of the western portion of LA-1b (see Figure 4.3-1), and the addition of a new façade to LA-1, as well as re-roofing, alterations to individual doorways, the closing of windows and doors, and the addition of skylights have all detrimentally affected the building's integrity of design, materials, and workmanship. Almost none of the building's original layout, style, or materials remain, and the structure does not read as a midcentury building due to these alterations. The integrity of the building's setting has further been affected by the re-landscaping and re-configuration of the lot's parking lot on its western side in 2015. The usage and configuration of the building also changed when it was converted from a warehouse into individual retail stores which have affected its feeling and association. As a result, the building does not appear to retain sufficient integrity to convey the historical pattern of industrial development. Research also did not identify any important local, State, or national historical events that occurred at LA-1. Therefore, LA-1 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 1, or Culver City Assessment Criterion B-2.

CC-1

CC-1 was constructed in 1954. CC-1 was originally connected to LA-1 through its eastern elevation; this connection was demolished in 2017. The structure was built during a period of intensive industrial and automotive development in Culver City, notably the Hayden Tract and Washington Boulevard, intended to promote economic growth in the post-World War II period. While the building is a part of this broad pattern of development, it does not retain the integrity necessary to convey this significance. CC-1 lacks integrity of setting, feeling, and association due to alterations to the surrounding lot and the demolition of its connection to LA-1. As a result of this demolition, the building's entire east elevation was re-built with new materials and a new design, detrimentally affecting the building's integrity of design, materials, and workmanship. As a result, the building does not appear as it did when it was first constructed and does not retain the integrity necessary to convey its historical associations with this broad pattern of history. Further, CC-1 does not have strong associations with a particular company or business that played a prominent role in the history of Culver City, Los Angeles, California, or the country. Therefore, CC-1 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 1, or Culver City Assessment Criterion B-2.

CC-2

CC-2 was constructed in 1954 as a garage and service station for a car lot that was formerly extant to the building's west. The building was constructed during a boom of development related to the automotive industry on Washington Boulevard in the 1950s and 1960s. During this period,

development of car lots proliferated rapidly in the neighborhood, although the structure does not have a strong association with a particularly notable car company or dealership that would rise to the level of significance required for eligibility.[32] The property demonstrates convenient automobile access from the street, although it does not have distinctive features other than its roll-up door, which is a replacement that dates to 2013. While CC-2 was a part of this pattern of mid-century automotive development in Culver City, the structure does not retain sufficient integrity to convey this history. The building's setting has been substantially altered over the years; the car lot with which it was affiliated was demolished. Many similar buildings on Washington Boulevard constructed at the same time have either been demolished or adaptively reused for different purposes. The building itself has undergone alterations to its primary south façade, including a new glass entrance door and non-original roll-up door, and has been converted to commercial retail use, affecting the structure's integrity of association and feeling. The structure thus does not retain its integrity of materials or design. As a result of these changes to its setting and to the building itself, CC-2 does not appear to retain sufficient integrity to convey its history as part of midcentury automotive development on Washington Boulevard. Therefore, CC-2 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 1 or Culver City Assessment Criterion B-2.

Criterion B/2/2/B-2: Significant Persons

LA-1

LA-1 was originally constructed as a manufacturing facility, warehouses, and storage for Dohrmann Hotel Supply Company in 1951. Research did not indicate that any significant individuals associated with the company were affiliated with LA-1. Subsequent occupants of the building include Lakeshore Learning Materials (ca. 1976 to ca. 2014); Palms Self Storage and Mail (1981–2014); and various furniture retail stores and companies, including Plummer Furniture (1987) and Jaxon Home Furnishes (2014). Research did not identify any significant individuals associated with these companies that were affiliated with LA-1. No information was found connecting persons involved with these companies to important events in history. Therefore, LA-1 does not appear to meet the eligibility requirements under National Register Criterion B, California Register Criterion 2, Los Angeles HCM Criterion 2, or Culver City Assessment Criterion B-2.

CC-1

CC-1 is not identified with historic personages or events in the main currents of national, State, or local history and is not associated with significant individual owners or occupants. Research did not indicate that the building was associated with any significant individual through its early years as a garage and service station. Research did not locate any individuals associated with the car dealership that played a significant role in history. Subsequent occupants, including Stone Candles, a company that occupied the property from at least 2009 until approximately 2014 and has re-located to a new location in Santa Monica, also do not have significant individuals associated with the company and, therefore, the property. Therefore, CC-1 does not appear to meet the thresholds

[32] Culver City Historical Society, N.D, Culver City Timeline: A Work in Progress, https://www.culvercityhistoricalsociety.org/about/culver-city-timeline/. Accessed July 11,, 2022.

of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 2, or Culver City Assessment Criterion B-2.

CC-2

CC-2 is not identified with historic personages. The property was occupied by a series of different manufacturing and commercial companies. No information was found connecting persons involved with these companies to important events in history. Therefore, CC-2 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 2, or Culver City Assessment Criterion B-2.

Criterion C/3/3/B-1: Design/Construction

LA-1

LA-1 is a utilitarian warehouse and manufacturing structure originally constructed in 1951. The architectural firm responsible for the design of the building is Meyer & Evers, a San Francisco-based partnership of Frederick H. Meyer (1876–1961) and Albert John Evers (1888–1977). The partnership designed many manufacturing and warehouse facilities in California, including Lucky Lager Brewing Company located in Sacramento in 1954 (extant). There are many examples of this firm's work throughout the State. Both architects had prolific careers, both as solo architects and through additional design partnerships and have designed more significant and notable buildings than LA-1. For example, Meyer designed the Humboldt Bank Building in San Francisco (1908; extant) and Evers designed the Floral Depot building in Oakland, California (1931; extant). Although both Meyer and Evers were significant architects who designed several notable buildings as individuals, the subject property is not an exceptional work of either man's work. There are better, more intact examples of both men's individual work, as discussed above.

As partners, their work appears to have resulted primarily in functional and utilitarian warehouse and manufacturing facilities. LA-1 is not an exceptional example of their work and there are more intact examples of the work spawned by their partnership throughout California, including the "play pavilion" at the Marin Art and Garden Center in Ross, California (1953; extant) and the Lucky Lager Brewing Company Warehouse in Sacramento (1952; extant). LA-1 is not a significant building, nor is it an intact example in their body of work. LA-1's architecture is further austere and utilitarian; it was designed for functional rather than aesthetic purposes. Warehouse and manufacturing facilities of this type are common throughout Los Angeles and Southern California. LA-1's architecture is not unique for buildings of its typology and there are similar mid-century warehouses that are more intact throughout Southern California. Further, the architecture of the building itself is reflective of the production needs of the plant, rather than any particular aesthetic. The building is a simple facility with no decorative ornament or detailing. It is neither an exceptional nor a rare example of its type.

While the building retains integrity of location, it does not retain integrity of setting due to the alterations to the Project Site over time, most notably in 2015 when the current landscaping, walking paths, and parking configuration were put into place. Additionally, the demolition of the connection between CC-1 and LA-1c has also affected integrity of setting due to the changes in the configuration of the Project Site as a result of this demolition. This has also affected the integrity of design, materials, and workmanship. These alterations further affected the building's integrity

of association; the uses of the buildings have changed to primarily retail over time and extensive alterations have been done to fit this use. The building does not visually read as a mid-century warehouse due to these changes. The loading dock and canopy present at the southern rear of LA-1c was demolished in 2015. The same year, the western portion of LA-1b was demolished. In 2018, the front of LA-1a facing Venice Boulevard was removed and new storefront façades were constructed, which are present today. These storefronts have no original material. The exterior façade that fronts onto Venice Boulevard is constructed almost entirely of new materials. These alterations, among others, detrimentally affect the building's integrity of association, workmanship, design, and materials. As a result, the building retains minimal original material and lacks integrity. Therefore, LA-1 does not appear to meet eligibility requirements for individual eligibility under National Register Criterion C, California Register Criterion 3, Los Angeles HCM Criterion 3, or Culver City Assessment Criterion B-1.

CC-1

The original architect, firm, or individual responsible for the design and construction of CC-1 is unknown although it does not appear to have been designed by a master architect or firm. The building is a simple, vernacular rectangular garage and service building constructed for practical purposes in support of an adjacent car lot. The building's architecture is not exceptional, nor is it a unique typology for the city, region, or State. The structure was designed for utilitarian purposes and has no notable design features. In addition to its unexceptional original design, CC-1 has experienced substantial alterations and does not retain its integrity of materials, design, workmanship, setting, feeling, or association. The building's windows and door on the west façade have between altered and replaced, and the north elevation entrance is non-original. The connection between the east portion of the building and LA-1 to its rear was demolished in 2017 and the east elevation of CC-1 has been re-built with new materials and a new design. The setting surrounding the building has also been altered due to new landscaping, walkways, and driveways added in 2015. These alterations have also affected the building's integrity of feeling and association as the appearance differs substantially from its original construction and does not visually read as a historic building. Therefore, CC-1 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 1, or Culver City Assessment Criterion B-1.

CC-2

CC-2 was also constructed by an unknown architect or firm. It was built as a supplemental structure to a now-demolished car lot located to its immediate west. The structure is rectilinear with no ornament or other decorative elements. There are many similar examples of this building typology in Culver City, Los Angeles, Southern California, and the nation. The architecture of the structure is not exceptional nor is it unique. In addition to not being an exceptional work of architecture, the building has undergone alterations on its primary south façade, including the addition of a new glass and metal door and roll up door, affecting its integrity of materials, design, and workmanship. The demolition of the adjacent lot has also harmed its integrity of association, feeling, and setting. Therefore, CC-2 does not appear to meet the thresholds of significance for individual eligibility under National Register Criterion A, California Register Criterion 1, Los Angeles HCM Criterion 1, or Culver City's criterion of historical or cultural significance.

Criterion D/4: Data Potential

While most often applied to archaeological districts and sites, Criterion D/4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D/4, they themselves must be, or must have been, the principal source of the important information. The buildings on the Project Site do not appear to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, LA-1, CC-1, and CC-2 are recommended ineligible for listing under National Register Criterion D, and California Register Criterion 4. There is no applicable criterion associated with data potential under the eligibility requirements for Culver City Cultural Resources or Los Angeles Historic Cultural Monuments.

Archaeological Resources

Prehistoric Setting

The chronology of Southern California human occupation is typically divided into three general time periods: the Early Holocene (9,600 cal[33] B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

The Project Site is located in a region traditionally occupied by the Gabrielino. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.[34] Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.[35] The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants,

33 The word 'cal' is used to signify a calibrated date.

34 A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

35 Lowell J. Bean and Charles R. Smith, "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538–549.

although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.[36]

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino.[37] Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism.[38]

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.[39] The closest named settlements to the Project Site are *Saa'anga* and *Waachnga.* Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley[40] indicates that the settlement of *Saa'anga* was located approximately 2.15 miles southeast of the Project Site, while the settlement of *Waachnga* was situated approximately 4.35 miles south. Both of these settlements are depicted as located close to Ballona Creek.

Identification of Cultural Resources Identified Within the Project Vicinity

South Central Coast Information Center Records Search

A records search for the Project Site was conducted on December 20, 2021, at the CHRIS-SCCIC housed at California State University, Fullerton. The records search included a review of all recorded cultural resources and previous studies within the Project Site and a 0.50-mile radius.

Previous Cultural Resources Investigations

The records search results indicate that eight cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 10 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments. Of the eight previous studies, none overlap the Project Site.

Previously Recorded Cultural Resources

The records search results indicate that a total of eight cultural resources have been recorded within the 0.50-mile radius. Of the eight resources, one is a multicomponent (including both historic architectural and historic archaeological components) resource (CA-LAN-3803); one is a historic-period archaeological resource (CA-LAN-4829); and six are historic architectural resources (P-19-162271, -175298, -177336, -177338, -186673, and -187052). None of these resources are located within the Project Site; however, one (CA-LAN-4829) is located within 100 feet of the Project Site. Resource CA-LAN-4829 consists of 13 features including the

[36] A. L. Kroeber, Handbook of the Indians of California, Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

[37] Wallace, William J., A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214–230, 1955.

[38] Lowell J. Bean and Charles R. Smith, "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538–549.

[39] Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

[40] McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, 1996.

remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s.

Other Research

Additional archaeological resources (the report for which has not yet been archived at the CHRIS-SCCIC as it is still in progress) were identified approximately 0.40-mile from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City.[41] These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. Moreover, three isolated historic-period artifacts (glass bottle containers for soda and liquor) were recovered during construction of another project located 50 feet from the Project Site in the upper five feet of disturbed fill sediments.[42] The report for this project has also yet to be submitted to the CHRIS-SCCIC. Both of these properties had a similar land use history as the Project Site.

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on October 18, 2021, to request a search of the SLF. The NAHC responded to the request in a letter dated November 29, 2021, indicating that the results were negative.

Geologic Map Review

Review of the geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles indicates that the Project Site is underlain by Quaternary alluvium deposits (Qa) and described as made up of alluvial gravel, sand and silt-clay, derived mostly from Santa Monica Mountains; gravel and sand of stream channels."[43]

Geotechnical Report Review

In order to garner information on the past land uses and level of previous development and disturbances that may have occurred within the Project Site, ESA reviewed the *Phase I Geotechnical Engineering Investigation* (Geotechnical Report).[44]

In August of 2021, two borings (B1 and B2) were drilled within portions of the Project Site (northern and southeastern) down to a depth of 80 feet below existing grade. Fill was found from

41 ESA, (*in progress*) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California, 2022. Report on file with ESA, Irvine, CA.

42 ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

43 Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991. https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. July 11, 2022. .

44 Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

the surface down to approximately 3 and 5 feet below existing grade, respectively. The fill was underlain by native alluvial soils consisting of sand, silt, and clay with varying composition.

Geotechnologies, Inc[45] indicates that in June of 2021 their firm also worked on two investigations within portions of the Project Site (southern, western and central), which pertained to the design of previous phases of the Project. Two borings and three test pits were excavated as part of these investigations. Borings were drilled to a depth of 90 feet below existing grade and test pits were excavated to depths between 10 and 20 feet below existing grade. In the borings, fill soils were observed between 3 and 11 ½ feet below existing grade. For the test pits, fill soils were observed between 3 ½ and 4 feet below grade.

Geotechnologies, Inc.[46] also mentions that a geotechnical exploration was conducted by Environmental Managers & Auditors, Inc. within portions of the Project Site (southern, central, eastern, and southwestern) where five exploratory borings were drilled to depths ranging between 5 and 51 ½ feet below existing site grade. In these borings, fill materials were observed from depths between 6 inches and 5 feet below grade. Fill materials were underlain by native alluvial soils.

Pedestrian Survey

An archaeological survey of the Project Site was conducted on October 29, 2021, by ESA staff. The survey was aimed at identifying archaeological resources within the Project Site. Approximately 5 percent of the Project Site was subject to an opportunistic survey that targeted areas with exposed ground surface, such as landscaped areas. The remaining 95 percent of the Project Site was not surveyed as it is currently developed with buildings, driveways, and parking. Landscaped areas within the Project Site were inspected, but no archaeological resources or other indicators of cultural resources (such as midden soils or shell) were observed. Ground surface visibility ranged from approximately 0–10 percent, due to grass, leaf litter, and mulch that covered the ground.

Subsurface Sensitivity Assessment

Prehistoric Archaeological Analysis

Review of the Geotechnical Report indicates that fill soils occur within the Project Site at varying depths from surface to 11.5 feet below ground surface with the majority ranging in depth between 0 and 4 feet, and that fill soils are underlain by "native soils". Review of geologic maps indicates these "native soils" consist of Quaternary alluvium which is a geologic unit dating to the time period between the late Pleistocene and Holocene (11,700 years ago to present) – the period for which there is widely accepted evidence for human occupation of southern California.[47] The alluvial sediments were deposited on the ancient floodplain of the Los Angeles River and consist

[45] Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

[46] Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

[47] Byrd, Brian F., and Mark L. Raab, Prehistory of the Southern Bight: Models for a New Millennium. In California Prehistory: Colonization, Culture, and Complexity, 2007. edited by Terry L. Jones and Kathryn A. Klar, pp 215–227.

of well-sorted silts and sands, interbedded with stream channel deposits of sands and gravels.[48] The former Los Angeles River (now Ballona Creek) would have attracted prehistoric inhabitants to the area along with flora and fauna resources that would have been exploited by them. Moreover, alluvial deposition often results in the burial and preservation of prehistoric archaeological materials. Although the Project Site is developed, construction of the warehouse buildings dating to the 1950s would not likely have involved particularly deep excavation and no basements are known to be associated with them. In cases where later development does disturb native sediments, archaeological materials can become intermixed within historic fill such as in the case with the two prehistoric metates encountered during monitoring (in the upper five feet of disturbed fill sediments) in connection with a development project in Downtown Culver City located approximately 0.40 miles from the Project Site in a similar geologic setting and underneath similar mid-century warehouse buildings. For these reasons, there is a *moderate* potential for prehistoric archaeological materials to be encountered as a result of Project-related ground disturbing activities.

Historical Archaeological Analysis

Development of the Project Site began in the 1920s with all of the development from this time period occurring in the southern portion of the Project Site (Culver City Parcel). The development included a two-story structure originally called the Green Mill (and subsequently the Cotton Club House and Zuccas Opera House) which featured a round three-foot deep concrete pool, a restaurant and club for dining and dancing. During the 1950s the Project Site was redeveloped for industrial uses, including a warehouse and manufacturing building with offices for the Dohrmann Hotel Supply Company (none of which appears to contain basements), and a surface parking lot located to the south of the buildings along National Boulevard and Washington Boulevard. Currently, the southern portion of the Project Site (along National Boulevard) is developed with a surface parking lot. Parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for parking lots are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the asphalt pavement could have served as a barrier that could have prevented further impacts to any such resources. Additionally, one historic-period archaeological resource (CA-LAN-4829) is located adjacent to the Project Site and was discovered during construction of a development project.[49] This resource consists of 13 features including the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s. Lastly, another construction project located 50 feet from the Project Site yielded the identification of three isolated historic-period artifacts (consisting of whole glass bottle containers) within the upper 5 feet of disturbed fill sediments at a property that had a similar land use history as the Project Site. Given the identification of historic-period archaeological resources in the vicinity and the potential for past and current land uses to have capped and sealed archaeological resources, the potential to encounter historic-period

[48] Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California, 1991. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1: 24,000, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

[49] ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angeles, CA 90017, 2018.

archaeological resources, especially in the southern portion of the Project Site, is considered moderate to high.

4.3.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

- **CUL-1:** Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- **CUL-2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- **CUL-3:** Disturb any human remains, including those interred outside of dedicated cemeteries.

Methodology

A project with an effect 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. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing the project's impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in both the Historical Report provided in Appendix C, of this Draft EIR, as well as the Archeological Resources Report provided in Appendix D, of this Draft EIR.

Historical Architectural Resources

As described in the Historical Report, a research effort and field inspection was undertaken that focused on the evaluation of potential historical resources located on the Project Site. The report included review of the following: SurveyLA; the 1990 Culver City HPAC and its subsequent updates; the California Office of Historic Preservation's BERD, which is a database of previously evaluated resources throughout the State maintained by that office; a records search at the CHRIS SCCIC; Calisphere; historic newspaper articles; and building permits. The records search included a review of all previous cultural resource studies and previously documented historic or architectural resources within a 0.25-mile radius of the Project Site. Based on the research efforts and field inspections, and as fully detailed in the Historic Report's assessment of significance of the property, there are no historical resources located on the Project Site.

As previously indicated, there are six previously recorded historic resources within 0.25 mile of the Project Site. A 0.25-mile radius is a standard distance for considering nearby historic resources in a dense, urban environment. The 0.25-mile radius study area is also appropriate here given the development of other properties of varying heights which in effect block views to and from the Project Site to buildings located beyond the 0.25-mile radius. One of these resources, the Santa Monica Air Line Segment, is a six-mile-long railroad track and does not contain any historic structures and as a flat linear resource without structures not visible to or from the Project Site there would not be any indirect impacts. Therefore, it will not be further analyzed for potential indirect impacts.

Archaeological Resources

The analysis of impacts to archaeological resources is based on the Archeological Resources Report, included in Appendix D of this Draft EIR, which includes: (1) land use history research (review of historic maps, Sanborn maps, and aerial photographs); (2) a cultural resource records search conducted at the CHRIS-SCCIC to review recorded cultural resources within a 0.50-mile radius[50] of Project Site, as well as a review of previous studies; (3) additional research on monitoring projects conducted in the vicinity of the current Project Site; (4) a SLF search through the NAHC; (5) geologic map review; (6) review of the Geotechnical Report for the Project; (7) a pedestrian survey; and (8) a subsurface sensitivity assessment.

Project Design Features

There are no project design features relative to cultural resources.

Analysis of Project Impacts

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Impact Analysis

Direct Impacts

As presented above and more fully documented in the Historic Report, no historical resources are located on the Project Site. The existing buildings on the Project Site, LA-1, CC-1, and CC-2 were found ineligible as historical resources due to a lack of significant historic associations and substantial alterations over time. As such, the demolition of these buildings in order to construct the Project would not cause a substantial adverse change in the significance of a historical resource, as there are no historical resources on the Project Site as defined in CEQA Guidelines Section 15064.5.

[50] For archaeological resources, a larger record search radius is necessary to capture a larger geographic area that can inform on the potential to encounter buried archaeological resources at the Project Site. For historical architectural resources, a smaller records radius is necessary given that the Project's direct and indirect impacts on these types of resources are typically limited to resources within the Project Site or in the immediate vicinity of the Project Site.

Indirect Impacts

The Helms Bakery Complex (one of the abovementioned resources) is located approximately 20 feet to the east of the Project Site at its closest point. The Helms Bakery Complex is a grouping of four industrial buildings, straddling the border of Los Angeles and Culver City, that was constructed between 1931 and 1949. The Complex is located on the block bounded by Venice Boulevard, West Washington Boulevard, and Hutchinson Avenue. Helms Avenue runs through the center of the Complex. The Helms Garage (1936) and Helms Hall (1949) are located entirely in Los Angeles and have been assigned status codes of 5S3, 3S, and 3CS by SurveyLA, meaning they appear eligible for the National Register, the California Register and at the local level based on survey evaluation. The Helms Bakery Building (1931) and the Beacon Laundry Building (1931) are located primarily in Culver City, although their northern portions are located in Los Angeles. Collectively, these buildings are referred to as the "Helms Bakery Complex." The Helms Bakery Building is a designated Culver City Landmark Structure, and the Beacon Laundry Building is identified a Significant Structure in Culver City. The Helms Bakery, Helms Garage and Beacon Laundy buildings have a similar PWA (Public Works Administration) Moderne architectural style with Art Deco elements and are clad in smooth stucco with prominent signage. The Helms Hall building has a more simplified PWA Moderne style and is clad in brick with more restrained ornamentation. Today, the Helms Bakery Complex has been adaptively reused and currently houses commercial businesses.

This Helms Bakery Building is located approximately 35 feet to the east of the Project Site and would remain intact in its current location. The Project would not physically impact or materially impair the Helms Bakery Complex and, therefore, would have no impact to its integrity of location, design, workmanship, or materials. A wide, paved alley separates the properties and there are currently indirect views to and from the Project Site. While land use around the intersection of Washington and National Boulevards has always been commercial and industrial in nature, the setting of the Helms Bakery Complex has evolved over time with the continual demolition and construction of buildings in the surrounding area. This natural evolution of urban development has already altered the historic setting of the Helms Bakery from a low-density commercial strip with mostly one-story buildings to a dynamic live/work district with multi-story complexes. Recent changes to the immediate setting of the Helms Bakery Complex include the construction of 8777 Washington Boulevard, a four-story building immediately adjacent to the Project Site, Ivy Station, a six-story mixed-use complex located directly across National Boulevard from the Project Site, and 8770 Washington Boulevard, the four-story mixed-used building located directly southwest of the Project Site on the corner of Washington Boulevard and Wesley Avenue.

The Project would construct two four- to five-story buildings ranging in height from 56 feet to 75 feet, a similar height to other structures in the area. While the proposed new construction would be larger than the existing improvements on the Project Site that are one-story and approximately 15 to 25 feet tall, it would not introduce a substantial new scale or massing to the overall existing nearby setting. There is already a four-story building immediately adjacent to CC-2 at 8777 Washington Boulevard, and the construction of additional four- to five-story buildings immediately adjacent to the one-story Helms Bakery Building would have only a limited effect on its immediate setting. The Project is of a scale that is consistent with existing contemporary development in the

vicinity, and its construction would represent the continued natural evolution of the commercial neighborhood.

The primary elevations of the Helms Bakery Complex that face north onto Venice Boulevard and south onto Washington Boulevard, would remain visible and unchanged after Project completion. The west elevation of the Helms Bakery Building that is separated from the Project Site by a wide alley, is mostly plain and unornamented and is used for purposes of loading and unloading. However, the southern end of this west elevation does have windows and decorative details that would now be visible with the removal of CC-2 under the Project, therefore increasing the visibility of the Helms Bakery Building along Washington Boulevard.

Furthermore, the Project would maintain the current setbacks along Venice and National Boulevards. While not entirely consistent, the overall massing of the Project and Helms Bakery building would be reasonably compatible, and the spatial relationship between the buildings would remain similar to existing conditions. A character defining features of the Project is a strong emphasis on linear form, which echo the decorative concrete lintels and cornice of the adjacent Helms Bakery Building. The corporate contemporary design of the new construction would be distinctive from yet compatible with the Helms Bakery Complex such that the existing complex would remain largely visible within the built environment in the same way it currently is, although there would actually be increased visibility of the Helms Bakery Building along Washington Boulevard due to the demolition of the existing building at 8771 Washington Boulevard, and the provision of a publicly accessible and privately maintained open space area in its place. The Project would therefore increase visibility of the Helms Bakery building and detract only minimally from the prominence of the Helms Bakery Complex within the built environment.

The Project's effect on the setting of the Helms Bakery Complex does not rise to the level of affecting the integrity of feeling or association, and all other factors of integrity pertaining to the Helms Bakery Complex would remain intact. Therefore, the new construction would not impact the eligibility of the Helms Bakery Complex. Therefore, indirect impacts to the Helms Bakery Complex would be less than significant, as the Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

Since evaluation of potential building damages considers the building itself, not the property line, the distance from the vibration sources are calculated at the building edge. The Helms Bakery Complex is located approximately 20 feet to the east of the Project Site boundary, separated by an existing alleyway. This proximity creates potential for impacts from construction vibration. Table 4.10-16, in Section 4.10, *Noise*, shows that the vibration level generated by a sonic/vibratory pile driver is 0.17 in/sec PPV (the equivalent of 93 VdB) and a large bulldozer would be 0.089 in/sec PPV (the equivalent of 87 VdB) at the reference distance of 25 feet. At a distance of 20 feet from the sonic/vibratory pile driver or the bulldozer, the vibration level would be approximately 0.25 in/sec (the equivalent of 96 VdB) for the sonic/vibratory pile driver or 0.126 in/sec (the equivalent of 90 VdB) for the bulldozer. This range of vibration levels would be lower than the significance thresholds of 0.3 in/sec PPV (the equivalent of 98 VdB), as shown in Table 4.10-1, for engineered concrete and masonry (no plaster) buildings, such as the Helms Bakery Building. Therefore, Project construction would not generate groundborne vibration in excess of the structural damage

thresholds for the Helms Bakery Building. Therefore, Project construction would not generate groundborne vibration in excess of the structural damage thresholds for the Helms Bakery building, and impacts would be less than significant.

The remaining four resources are all located in the Palms neighborhood of Los Angeles and are as follows: 3380 South Robertson Boulevard; 3340 South Robertson Boulevard; 3377 South Robertson Boulevard; and 3373 South Robertson Boulevard. The building at 3380 South Robertson is a vernacular former industrial building; the other buildings are all single-family residences. 3373 South Robertson and 3380 South Robertson have been assigned status codes of 3S, 3CS, and 5S3, meaning that they appear eligible for Local, State and Federal listing based on survey evaluation. 3340 South Robertson and 3377 South Robertson have been assigned status codes of 5S3 and 3CS, meaning that they appear eligible for Local and State listing based on survey evaluation. These resources are clustered near each other, all approximately 1,000 feet or more northwest of the Project Site. As such, the indirect impacts from the Project would be the same for all of these remaining four resources. What follows is a description of each individual resource, followed by an indirect impacts analysis applicable to all four resources.

The four resources are separated from the Project Site by several streets, including the major thoroughfare of Venice Boulevard. There are multiple buildings, trees and other plantings between the two properties. None of these buildings have direct or indirect views of the Project Site. Any potential views of the new construction from the property would be obscured due to the presence of other existing intervening buildings, trees, and streets in the dense urban environment. Thus, the Project would not result in a substantial material change to the integrity of 3380 South Robertson Boulevard; 3340 South Robertson Boulevard; 3377 South Robertson Boulevard; and 3373 South Robertson Boulevard or their immediate surroundings that would detract from their ability to convey their significance.

3380 South Robertson Boulevard; 3340 South Robertson Boulevard; 3377 South Robertson Boulevard; and 3373 South Robertson Boulevard are located in Palms, a neighborhood that has historically had commercial, industrial, and residential buildings. This mix of usages remains consistent to this day. The Project would also be a commercial development and, as such, the use would be consistent with the existing and historic uses on the street and in the neighborhood. The Project would develop two four- to five-story buildings ranging in height from 56 feet to 75 feet, consistent with the surrounding structures that range from one to six stories. The Project would not introduce a substantial new scale or massing to the existing setting, nor would it physically impact or materially impair the district and, therefore, would have no impact to its integrity of location, design, workmanship, or materials. The new construction would not detract from the visibility or prominence of these resources within the built environment and would not detract from the integrity of setting, feeling or association of these resources.

Therefore, indirect impacts to the buildings located at 3380 South Robertson Boulevard, 3340 South Robertson Boulevard, 3377 South Robertson Boulevard, and 3373 South Robertson Boulevard would be less than significant, as the Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5. At the conclusion of the Project, the significance and integrity of these resources would remain intact.

Mitigation Measures

The Project was determined to have a less than significant impact with regard to historical resources. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Less than significant impacts to historical resources were determined. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold CUL-2: The Project would have a significant impact if it were to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

Sediments within the Project Site consist of Quaternary alluvium, which were deposited on the ancient floodplain of the Los Angeles River (now Ballona Creek). The river would have attracted prehistoric inhabitants to the area along with flora and fauna resources that would have been exploited by them. Moreover, alluvial deposition often results in the burial and preservation of prehistoric archaeological materials.

No known archaeological resources were identified within the Project Site. However, the records search through the CHRIS-SCCIC yielded the identification of one historic-period archaeological resource (CA-LAN-4829) within close proximity to the Project Site consisting of 13 features including the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s. Additionally, recent construction projects in Culver City have yielded the identification of two prehistoric metate artifacts and three isolated historic-period artifacts (consisting of glass bottle containers) within the 0.50-mile radius of the Project Site. These resources were found within disturbed fill sediments at properties that had a similar land use history as the Project Site.

The land use history research identified historic land uses in the southern portion of the Project Site including a two-story structure originally called the Green Mill (and subsequently the Cotton Club House and Zuccas Opera House) which featured a round three-foot deep concrete pool, a restaurant and club for dining and dancing dating to the period between 1924 to at least 1949. This portion of the Project Site is currently developed with surface parking which is unlikely to have been subject to deep excavations that would have displaced or destroyed buried archaeological resources.

Based on these findings, the northern portion of the Project Site is assigned a low sensitivity for historic-period archaeological resource since no known previous uses existed in this area; however, the potential for historic-period archaeological resources in the southern portion of the Project Site is considered moderate to high. Also, the potential to encounter prehistoric archaeological resources is moderate across the entire Project Site; therefore, impacts to previously unknown buried historic and prehistoric archaeological resources are considered potentially significant.

Mitigation Measures

Mitigation Measures CUL-MM-1 through CUL-MM-3 are required to address potential impacts on archaeological resources during Project construction:

> **CUL-MM-1**: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.
>
> Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
>
> **CUL-MM-2**: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.
>
> All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City (City) to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

CUL-MM-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

Mitigation Measures TCR-MM-1, TCR-MM-2, and TCR-MM-3 shall also be implemented and shall apply to address the potential discovery of tribal cultural resources.

Level of Significance after Mitigation

Impacts related to archaeological resources during Project construction would be reduced to less than significant with implementation of the above mitigation measures. Monitoring of the Project Site during ground disturbing activities by a professional archaeologist would result in the identification and assessment of significant or unique archaeological resources, as well as the implementation of appropriate measures in accordance with CEQA.

Threshold CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries.

As discussed in the Initial Study (Appendix A), 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, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant. Thus, the Project would have a less than significant impact with respect to Threshold CUL-3 and no further analysis is required.

Cumulative Impacts

Impact Analysis

Historical Resources

Related development projects in the vicinity are identified in Chapter 3, *Environmental Setting*, of this Draft EIR. As the Project would not have a direct or indirect impact on any historical resources, there would be no cumulative impacts due to direct or indirect impacts. As detailed in the indirect impact analysis provided above, the Project's indirect effects on proximate historical resources would not meaningfully detract from their visibility or prominence, or from their integrity of setting, feeling or association. Similar to the Project, the indirect effects of other related projects in the vicinity would not detract from views to these resources or adversely affect their ability to convey their significance. In addition, although the Ivy Station and 8777 Washington Boulevard projects are located in proximity to the Project Site, they are both completed projects and would not contribute to combined cumulative impacts associated with potential construction structural vibration effects on the Helms District. Therefore, impacts from related projects are not cumulatively considerable and the cumulative effects from these projects are considered less than significant.

Archaeological Resources

Many of the related projects identified in Chapter 3, *Environmental Setting*, of this Draft EIR, would require excavation that could potentially expose or damage potential archaeological resources. However, these related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures or conditions of approval would be required for related projects that have the potential to cause significant impacts to undiscovered archaeological resources, including existing regulations for undiscovered human remains. Implementation of such mitigation measures, conditions of approval, and compliance with regulations would avoid significant impacts. State requirements regarding impacts on archaeological resources and CEQA compliance require monitoring of excavation activities and treatment and/or curation of discovered resources where appropriate (PRC Section 15064.5). Such standard construction practices, particularly over a range of project sites, provide for protection, recovery and curation of discovered resources and preserve their contributions to the knowledge base of past population activity in the area. For those projects not subject to CEQA review, there would be some potential for impacts on archaeological resources and human remains in the event there are excavations that extend into soils conducive to retaining resources; however, regulations contained in the California Health and Safety Code and Penal Code would apply in some instances, and circumstances involving a loss of such resources are expected to be limited. Therefore, impacts from related projects are not cumulatively considerable and the cumulative effects from these projects are considered less than significant.

The Project is required to comply with the Mitigation Measures CUL-MM-1 through CUL-MM-3 and regulations cited above in the event resources are found, thus ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation

monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources from related projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

Mitigation Measures

Cumulative impacts to historical and archaeological resources and human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts related to historical and archaeological resources and human remains would be less than significant without mitigation.

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4.4 Energy

4.4.1 Introduction

This section analyzes impacts on energy resources due to construction and operation of the Project. CEQA Guidelines Section 15126.2 (b) states that a project's energy use shall be analyzed to determine the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, as well as being compliant with building codes and renewable energy features. Appendix G of the CEQA Guidelines checklist, Section VI, *Energy*, includes questions to assist lead agencies when assessing a project's potential energy impacts. Additionally, CEQA Guidelines Appendix F provides guidance on information to use when evaluating a project's energy use.

In accordance with the applicable Appendix G sections and utilizing guidance from Appendix F of the CEQA Guidelines, this EIR includes relevant information and analyses that address the energy implications of the Project, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations can be found in Appendix E of this Draft EIR. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including in Chapter 2, *Project Description*, and Section 4.6, *Greenhouse Gas Emissions*, Section 4.14.1, *Utilities and Service Systems – Water Supply*, and Section 4.14.2, *Utilities and Service Systems – Wastewater*.

4.4.2 Environmental Setting

Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and City of Culver City and City of Los Angeles levels. As described below these plans, guidelines, and laws include the following:

- Corporate Average Fuel Economy Standards
- Energy Independence and Security Act of 2007
- Federal Energy Policy and Conservation Act
- Senate Bill 1389
- Renewables Portfolio Standard
- California Building Standards Code (Title 24)
- Assembly Bill 1493/Pavley Regulations
- California Air Resources Board
  - Climate Change Scoping Plan
  - Advanced Clean Car Program
  - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
  - In-Use Heavy-Duty Diesel-Fueled Fleets Regulation

- SB 375 (Sustainable Communities Strategy)
- Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Culver City Municipal Code
- Culver City Bicycle & Pedestrian Action Plan
- Culver City Clean Power Alliance
- Culver City Reach Code
- Los Angeles Mobility Plan 2035
- Los Angeles Green Building Code
- Los Angeles Green New Deal

Federal

Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[1] USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[2]

In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[3] These standards set a combined fleet wide average of 36.9 to 37 miles per gallon (mpg) for the model years affected.[4] In February 2022, the USEPA issued the

1 U. S. Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.

2 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.

3 USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

4 National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[5] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establish the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[6]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[7]

In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[8] These standards set a combined fleet wide average of 36.9 to 37 miles per gallon (mpg) for the model years affected.[9] On January 20, 2021, President Biden issued Executive Order 13990 ‘‘Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis’’ directing EPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule for Model Years 2021–2026. In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[10] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establish the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[11]

5 USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

6 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

7 USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

8 USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

9 National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

10 USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

11 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[12]

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U. S. Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) actions described above (refer to Corporate Average Fuel Economy Standards, above) (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[13]

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the

[12] USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

[13] A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

State

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code Section 25301[a]). The 2020 Integrated Energy Policy Report, the latest published report from CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

Renewables Portfolio Standards

First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[14] SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[15]

California Building Standards Code (Title 24)

California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor

14 California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018.
15 California Public Utilities Commission, RPS Program Overview, 2018.

environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[16] The 2019 Title 24 standards continue to improve upon the 2016 Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings which include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards.[17] The 2022 Title 25 standards will become effective on January 1, 2023.

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Building Code. The CALGreen Building Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[18] The current 2019 CALGreen Building Code improves upon the 2016 CALGreen Building Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2019 CALGreen Building Code went into effect on January 1, 2020. An updated 2022 CALGreen Building Code will go into effect on January 1, 2023. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these standards.

Assembly Bill 1493/Pavley Regulations

In response to the transportation sector's large share of California's CO_2 emissions, Assembly Bill (AB) 1493 (commonly referred to as the Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light-duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017–2025 (CARB, 2002; USEPA, 2012). As discussed above, in April 2020, USEPA promulgated the SAFE Vehicles Rule for model years 2021-2026 in the federal register (Federal Register, Vol. 85, No. 84, Thursday April 30, 2020, Rules and Regulations) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for USEPA to reconsider the published rule. As of March 15, 2022, the USEPA published its Notice of Decision to restore California's waiver, thereby ending the SAFE rule (87 Fed. Reg. 14,332).

California Air Resources Board

Climate Change Scoping Plan

In response to the passage of AB 32 and the identification of the statewide 2030 GHG reduction target (i.e., 40 percent below statewide 1990 level GHG emissions by 2030), CARB adopted the

[16] California Energy Commission, 2019 Building Energy Efficiency Standards, 2019.

[17] California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.

[18] California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, 2018.

2017 Climate Change Scoping Plan in December 2017.[19] The 2017 Climate Change Scoping Plan identifies technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Climate Change Scoping Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.[20] The 2017 Climate Change Scoping Plan strategies have co-benefits of improving energy and transportation fuel efficiency. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding this plan.

Advanced Clean Car Program

The Advanced Clean Car emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[21] The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered. Effective November 26, 2019, the SAFE Vehicles Rule Part One: One National Program withdraws the California waiver for the GHG and ZEV programs under Section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Car and ZEV mandates. In response, several states including California filed a lawsuit challenging the withdrawal of the USEPA waiver.[22] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[23] As of March 14, 2022, the USEPA published its Notice of Decision to restore reinstate California's waiver for its Advanced Clean Cars program, which allows the state to set and enforce more stringent standards than the federal government, including California's GHG standards and zero emission vehicle mandate, thereby ending the SAFE rule (87 Fed. Reg. 14,332).

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, the CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter

19 California Air Resources Board, 2017 Scoping Plan, November 2017.

20 California Air Resources Board, 2017 Scoping Plan, November 2017, p. 6.

21 California Air Resources Board, Clean Car Standards – Pavley, Assembly Bill 1493. Last reviewed January 11, 2017, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley. Accessed July 11, 2022.

22 United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

23 United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

emissions (CCR Title 13, Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

In-Use Off-Road Diesel-Fueled Fleets Regulation

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

Regional

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020–2045 Regional Transportation

Plan/Sustainable Communities Strategy (RTP/SCS), adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016–2040 RTP/SCS.

The 2020–2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020–2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, the 2020–2045 RTP/SCS includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

Local

City of Culver City

Culver City Municipal Code

The City of Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to the Culver City Municipal Code (CCMC) Chapter 15.02.1005, the City requires 1 kilowatt (kw) of PV power installed per 10,000 square feet (sf) of new development. The CCMC includes an option to pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. Under Chapter 17.320.035 of the CCMC, the City goes beyond CALGreen Building Code standards and requires at least 20 percent EV capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.[24] Additionally, Sections 4.408.1 and 5.408.1 Construction Waste Management require the recycle and/or salvage for reuse a minimum of 75 percent of nonhazardous construction and demolition waste.

In 2009, the City adopted the Green Building Program as CCMC Chapter 15.02.100, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting has to be either fluorescent, LED or other type of high-efficiency lighting, and specific features for parking garages would require all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

Culver City Bicycle & Pedestrian Action Plan

As discussed in Section 4.9, *Land Use and Planning*, the Circulation Element provides objectives and policies to encourage the use of public transit and provide safe and attractive pedestrian

[24] City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 11, 2022.

facilities thereby encouraging more people to reduce automobile travel in favor of alternative forms of transportation.[25] The City updated the Bicycle & Pedestrian Master Plan with the Action Plan which received public input from 2017 through 2019. The Action Plan was adopted by the City Council in June 2020.[26] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community. The approved Action Plan shows that both Jefferson Boulevard and Sepulveda Boulevard, immediately adjacent to the Project Site, are planned as Class IV Separated Bikeways.[27]

Culver City Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Culver City. With this change, CPA purchases the renewable energy resources for electricity and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA to remain with SCE as their provider. The Project's energy analyses conservatively assume the Project will remain with SCE as their electricity provider and does not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2022 based on the required renewables by year 2024 under SB 100.[28]

Culver City Reach Code

The Culver City Reach Code, codified under Section 15.02.1100 of the CCMC, establishes building energy efficiency standards that are additional to the standards established by the State's CALGreen Building Code and Title 24 Energy Code requirements. The Culver City Reach Code includes provisions for all new buildings with separate standards for buildings of 49,999 sf or less (Category 1) and buildings 50,000 sf or more (Category 2). The following requirements do not apply to one- and two-family residences.

For Category 1 buildings, the Reach Code provides a list of 25 items that new buildings can implement in order to meet the standards. A project must comply with at least 80 percent of all items listed. Examples include: gas heating units being 93 percent energy efficient, installing

25 City of Culver City, Circulation Element, 1995, p. C-8.

26 City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

27 As defined by Caltrans, a Class IV separated bikeway is an on-street facility that is physically separated from other motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle.

28 For the purposes of estimating energy demand, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section.

radiant barriers on all new roof sheathing, installing high efficiency lighting in all exterior and interior spaces, and installing 1 kW of solar photovoltaic.

For Category 2 buildings, the Reach Code establishes three mandatory requirements related to LEED certification. The requirements include the following:

(1) Prior to the issuance of a building permit, the applicant shall submit:
   a. Evidence that a LEED Accredited Professional (AP) is one of the members of the project team
   b. Evidence that the project has been registered with the USGBC's LEED Program
   c. Complete a LEED Checklist including points allocated to the "Innovation and Design" category, which demonstrates that the project meets the selected LEED® Rating System at the "Certified" level or higher.
   d. A signed declaration from the LEED®-AP member of the project team, stating that the plans and plan details have been reviewed and the project meets the intent of the criteria for certification of the selected LEED® Rating System at the "Certified" level or higher.
(2) The project shall comply with USGBC's "3 point margin of error" for LEED Certification.
(3) Applicant shall submit to the Building Official copies of all correspondence between the applicant and USGBC regarding the project.

City of Los Angeles

Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[29] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

(1) Safety First
(2) World Class Infrastructure
(3) Access for All Angelenos
(4) Collaboration, Communication, and Informed Choices
(5) Clean Environments and Healthy Communities

Each of the goals contains objectives and policies to support the achievement of those goals.

Los Angeles Green Building Code

Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the "Los Angeles Green Building Code," which incorporates by reference portions of the CALGreen Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-

[29] Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details.

Los Angeles Green New Deal

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.[30] Los Angeles' Green New Deal is the first four-year update to the City of Los Angeles' first Sustainable City pLAn that was released in 2015 and therefore replaces and supersedes the Sustainable City pLAn.[31] It augments, expands, and elaborates in more detail Los Angeles' vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals.

While not an adopted plan, the City's mayoral-initiated Green New Deal includes short-term and long-term aspirations pertaining to climate change. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square foot for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 thousand British thermal units per square foot (mBTU/sf) in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the City to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.

30 City of Los Angeles. LA's Green New Deal, 2019.
31 City of Los Angeles, Sustainable City pLAn, 2015.

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds (lbs.) of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

Existing Conditions

Existing Electricity Sales – Southern California Edison

Electricity, as a consumptive utility, is a manufactured resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, the capacity of a generator is typically rated in megawatts (MW), which is 1 million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

SCE provides electrical services to approximately 15 million people, 15 counties, 180 incorporated cities including the City of Culver City and the Project Site, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area, across central, coastal and southern California, an area bounded by Mono County to the North, Ventura County to the West, San Bernardino County to the East, and Orange County to the South.[32] SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 MW), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 MW), and geothermal sources. The annual electricity sale to customers in 2021 was approximately 82,048,000 MWh.[33] See **Table 4.4-1**, *Existing Annual Regional Energy Use*, for a summary of energy use for the region, including the SCE service area.

[32] Southern California Edison (SCE), Who We Are, April 2022.

[33] Edison International and SCE, 2021 Annual Report, 2022, p. 2, https://www.edison.com/home/investors/financial-reports-information/annual-reports.html. Accessed July 11, 2022.

TABLE 4.4-1
EXISTING ANNUAL REGIONAL ENERGY USE

Source	Amount
Electricity (SCE service area, 2021)[a]	82,048,000 MWh
Electricity (LADWP service area, 2020)[b]	25,200,000 MWh
Natural Gas (SoCalGas service area)[c]	1,158,875 MMcf
Gasoline (Los Angeles County)[d]	2,770,000,000 gallons
Diesel (Los Angeles County)[d]	610,204,082 gallons

NOTE: MWh = megawatt-hours; MMcf = million cubic feet.

SOURCES:

[a] Edison International and Southern California Edison (SCE), 2021 Annual Report, 2022, p. 2, https://www.edison.com/home/investors/financial-reports-information/annual-reports.html. Accessed July 11, 2022.

[b] California Gas and Electric Utilities, 2020 California Gas Report, page 144.

[c] California Gas and Electric Utilities, 2020 California Gas Report, page 144.

[d] California Energy Commission (CEC), California Retail Fuel Outlet Annual Reporting (CEC-A15) Year 2019 Results.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewables Portfolio Standard. As shown in **Table 4.4-2**, *Electric Power Mix Delivered to Retail Customers in 2020*, SCE did not meet its requirement to procure at least 33 percent of its energy portfolio from renewable sources by 2020. Senate Bill (SB) 350 (Chapter 547, Statues of 2015) and SB 100 (Chapter 312, Statutes of 2018) further increased California's Renewables Portfolio Standard and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The legislation also instructed CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.[34] SCE anticipates it will meet its own climate change and renewables objectives that align with SB 100's 2045 renewables requirement.[35]

TABLE 4.4-2
ELECTRIC POWER MIX DELIVERED TO RETAIL CUSTOMERS IN 2020

Energy Resource	2020 SCE	2020 LADWP	2020 CA Power Mix (for comparison)
Eligible Renewable	**30.9%**[a]	**36.7%**	**33.1%** [a]
Biomass & bio-waste	0.1%	0.1%	2.5%
Geothermal	5.5%	9.6%	4.9%
Eligible hydroelectric	0.8%	1.7%	1.4%
Solar	15.1%	14.5%	13.2%
Wind	9.4%	10.8%	11.1%
Coal	**0.0%**	**16.0%**	**2.7%**

[34] California Legislative Information, Senate Bill 100, California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases, Approved by Governor on September 10, 2018, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed July 11, 2022.

[35] Edison International and SCE, 2020 Annual Report, 2021.

Energy Resource	2020 SCE	2020 LADWP	2020 CA Power Mix (for comparison)
Large Hydroelectric	3.3%	5.4%	12.2%
Natural Gas	15.2%	27.9%	37.1%
Nuclear	8.4%	14.0%	9.3%
Other	0.3%	0.1%	0.2%
Unspecified sources of power[b]	42.0%	0.1%	5.4%
Total	100%	100%	100%

[a] Percentages are estimated annually by the CEC based on the electricity sold to California consumers during the previous year.

[b] "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

SOURCES: CEC, Annual Power Content Labels for 2020. https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label/annual-power-content-1.
Edison International and SCE, 2020 Annual Report, March 2020.

Existing Electricity Sales – Los Angeles Department of Water and Power

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City of Los Angeles, including the Project Site, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 8,000 MW.[36] On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,502 MW.[37] As shown in Table 4.4-2, approximately 36.7 percent of LADWP's 2020 electricity purchases were from renewable sources, which is similar to the 33.1 percent statewide percentage of electricity purchases from renewable sources.[38] The annual electricity sale to customers for the 2020 fiscal year was approximately 25,200,000 MWh.[39]

Existing Natural Gas Supply

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring

[36] Los Angeles Department of Water and Power, Briefing Book 2020-2021, p. 59.

[37] Los Angeles Department of Water and Power, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 11, 2022.

[38] California Energy Commission (CEC), Annual Power Content Labels for 2020, 2021.

[39] Los Angeles Department of Water and Power, Briefing Book 2020-2021, p. 59.

reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of both cubic feet (cf) or British thermal units (Btu).

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. The Project Site is served by the Southern California Gas Company (SoCalGas), which is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout central and southern California, from the City of Visalia to the US/Mexican border.[40]

SoCalGas, along with five other California utility providers, released the 2020 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2035. The 2020 California Gas Report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[41]

SoCalGas receives gas supplies from several sedimentary basins in the western United States (US) and Canada, including supply basins located in New Mexico (San Juan Basin), west Texas (Permian Basin), the Rocky Mountains, and western Canada as well as local California supplies.[42] Sources of natural gas in the southwestern US will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[43] Gas supply available to SoCalGas from California sources averaged 3,175 million cf per day or 3,292,475 million Btu (MMBtu) per day in 2020. This equates to an annual average of 1,158,875 million cf per year or 1,201,753,375 MMBtu per year.[44] See Table 4.4-1 for a summary of energy use for the region, including the SoCalGas service area.

Existing Transportation Energy

The annual transportation fuel consumption of diesel and gasoline in 2020 for California (the most recent year for which statewide data is available) is 3,559 million gallons and 12,572 million gallons, respectively.[45] Transportation fuel consumption of diesel and gasoline for Los Angeles County in 2020 is 610 million gallons and 2,770 million gallons, respectively.[46] The estimated Los

40 SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 11, 2022.
41 California Gas and Electric Utilities, 2020 California Gas Report.
42 California Gas and Electric Utilities, 2020 California Gas Report.
43 California Gas and Electric Utilities, 2020 California Gas Report.
44 California Gas and Electric Utilities, 2020 California Gas Report.
45 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 11, 2022.
46 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 11, 2022.

Angeles County and statewide transportation fuel consumption is based on retail sales data from the CEC.[47] See Table 4.4-1 for a summary of Los Angeles County fossil fuel consumption in 2020.

The State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.[48]

Existing Project Site

The 4.46-acre Project Site is improved with low-rise warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing on-site uses. The Project Site is mostly flat with gradual sloping from north to south. Landscaping on the Project Site is limited to parking medians, street edge, and building perimeter planting. As detailed in Table 4.4-4, below, it is estimated that the existing site currently uses 1,217,631 kWh of electricity, 1,058,301 cf of natural gas, 159,408 gallons of gasoline, and 23,179 gallons of diesel on an annual basis.

4.4.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to energy if it would:

- **ENE-1:** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- **ENE-2:** Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in Appendix G and Appendix F of the CEQA Guidelines, as appropriate, to assist in answering the Appendix G questions. The factors to evaluate energy impacts under Threshold ENE-1 include:

- The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the Project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the Project on peak and base period demands for electricity and other forms of energy;

[47] CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 11, 2022.

[48] CEC, 2019 Integrated Energy Policy Report, February 2020, p. 228, https://efiling.energy.ca.gov/getdocument.aspx?tn=232922. Accessed July 11, 2022.

- The effects of the Project on energy resources; and
- The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with Appendix G and Appendix F of the CEQA Guidelines, the degree to which the Project complies with existing energy standards is considered, as appropriate, to evaluate impacts under Threshold ENE-2.

Methodology

Construction

Construction energy impacts were assessed based on the incremental change in energy compared to baseline conditions. Under CEQA, the baseline environmental setting for an EIR is generally established at or around the time that the Notice of Preparation (NOP) for the EIR is published. As discussed in Chapter 2, *Project Description*, of this Draft EIR, the Project would involve demolition of the three existing buildings on the Project Site, totaling 105,047 sf, to support the proposed 536,000 sf 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 2 buildings totaling 18,821 sf and construction of a new 167,000-sf office building. 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.

Project construction is estimated to start in 2023. Construction activities can vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. This analysis is based on estimated maximum construction activities, meaning that for each phase of construction it was assumed that all of the vehicles and equipment that could be used for that phase are in simultaneous use for all day and every day of the phase.

Electricity

Construction electricity was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control. The construction office was assumed to be a 1,000-square-foot trailer and was modeled using CalEEMod (version 2020.4.0).[49] In addition, electricity from water conveyance for dust control was also calculated based on the estimated water consumption rate per day (refer to Section 4.14.1, *Utilities and Service Systems – Water Supply*) and assuming that water used for construction is non-potable and delivered on-site by trucks to cover the area during construction activity. Region -specific water electricity intensity factors for recycled non-potable water generation and conveyance were used to convert the volume of water needed to electricity demand from water conveyance.[50]

[49] California Air Pollution Control Officers Association, California Emissions Estimator Model, 2021, http://caleemod.com/. Accessed July 11, 2022.

[50] Next 10 and Pacific Institute, The Future of California's Water-Energy-Climate Nexus, Table 4.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas is not expected to be consumed in during Project construction. Therefore, natural gas associated with construction activities was not calculated.[51]

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix B of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour from CARB's off-road vehicle (OFFROAD) model. Fuel consumption from construction on-road worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the emissions modeling worksheets and CalEEMod construction output files. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC2021 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. CalEEMod assumed trip lengths were used for worker commutes while vendor, management visits, concrete, and haul truck trips were taken from emissions modeling worksheets that used EMFAC2021 emission factors.

Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor trucks were assumed to be a mix of medium-heavy-duty and heavy-duty diesel trucks, and concrete and haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix E of this Draft EIR for detailed energy calculations.

The energy usage required for Project construction has been estimated based on the number and type of construction equipment that would be used during Project construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels). Energy for construction worker commuting trips has been estimated based on the predicted number of workers for the various phases of construction and the estimated VMT based on the conservative values in the CalEEMod and EMFAC2021 models. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulatory requirements that would minimize the amount of energy usage during construction. These measures are also discussed in Chapter 2*, Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

The construction equipment and haul trucks would likely be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment and haul trucks would be diesel-fueled. The estimated fuel economy for heavy-duty construction equipment is based on fuel

[51] In general, natural gas would not be expected to be used and this energy analysis assumes heavy-duty construction equipment is diesel-fueled, as is typically the case. However, natural gas-fueled heavy-duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. This would not substantially affect the energy analysis or conclusions provided herein.

consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks and worker commute vehicles is based on fuel consumption factors from the CARB EMFAC emissions model, which is a State-approved model for estimating emissions on-road vehicles and trucks. Both OFFROAD and EMFAC are incorporated into CalEEMod. However, fuel consumption for worker, vendor, and concrete/haul trucks were calculated outside of CalEEMod using emission factors from EMFAC2021 to provide a more detailed and accurate account of truck fuel consumption.

Operation

Operation of the Project would require energy in the form of electricity and natural gas for building space and water heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation fuels, primarily gasoline, for on-site landscaping equipment and vehicles traveling to and from the Project Site. Operational energy impacts were assessed based on the increase in energy demand compared to existing conditions. Within the CalEEMod software, building electricity and natural gas usage rates were adjusted to account for prior Title 24 Building Energy Efficiency Standards for the existing uses.[52] The net change in operational energy demand is based on the difference between the existing Project Site energy demand and the energy demand of the Project at full buildout.

Electricity

The Project's estimated electricity demand was analyzed relative to SCE's and LADWP's existing and planned energy supplies in 2026 (i.e., the Project buildout year) to determine if the utility would be able to meet the Project's energy demands. Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) from Project operation was calculated using demand factors provided in CalEEMod based on the 2019 Title 24 standards, which went into effect on January 1, 2020. Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) was estimated based on new buildings and facilities. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations and its land use transportation characteristics that would minimize the amount of energy usage during operations. These features and characteristics are also discussed in Chapter 2, *Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. Electricity generated by the existing site was calculated using demand factors provided in CalEEMod and subtracted from the Project's electricity demand to obtain the net annual electricity demand.

Natural Gas

The Project's estimated natural gas demand was analyzed relative to SoCalGas' existing and planned energy supplies in 2026 (i.e., the Project buildout year)[53] to determine if the utility would be able to meet the Project's energy demands. Natural gas demand for the Project would be generated mainly by building heating and appliances. Natural gas demand generated by the

[52] California Air Resources Board, CalEEMod User's Guide, Appendix E, Section 5, September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

[53] California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 145.

existing site was calculated using demand factors provided in CalEEMod and subtracted from the Project's natural gas demand to obtain the net annual natural gas demand.

Transportation Fuels

Energy for transportation from Project and existing land use visitors and employees traveling to and from the Project Site is estimated based on the predicted number of trips to and from the Project Site and existing site, based on VMT output from the Los Angeles VMT Calculator used to estimate trips for the Project.[54] The Project and existing annual VMT is based on the sum of the estimated daily VMT (365 days out of a year). Refer to VMT data in Appendix B of this Draft EIR and energy calculations in Appendix E of this Draft EIR.

Project Design Features

The Project would include project design features designed to improve energy efficiency as set forth in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Analysis of Project Impacts

Threshold ENE-1: Would the Project result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels (diesel and gasoline).

The Project's Energy Requirements and its Energy Use Efficiencies by Amount and Fuel Type for Each Stage of the Project Including Construction, Operation, Maintenance, and/or Removal. If Appropriate, the Energy Intensiveness of Materials may be Discussed

For the purposes of this analysis, Project maintenance would include activities, such as repair of structures, landscaping, and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

Construction

During Project construction, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, and for water conveyance for dust control. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers

[54] City of Los Angeles, VMT Calculator. Provided in Appendix B of this Draft EIR.

traveling to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Table 4.4-3, *Summary of Energy Use During Project Construction*, provides a summary of the annual average electricity, gasoline fuel, and diesel fuel estimated to be consumed during Project construction. Each of these is discussed and analyzed in greater detail in the sections below. As specified earlier, these figures represent a highly conservative estimate in that it assumes the maximum volume of on-road and off-road construction equipment usage every day for each phase of construction.

Electricity

During construction of the Project, electricity would be consumed, on a limited basis, to power lighting, electric equipment, and supply and convey water for dust control and for an on-site construction trailer. Electricity would be supplied to the Project Site by SCE for Building 1 and LADWP for Building 2 and would be obtained from the existing electrical lines that connect to the Project Site.

TABLE 4.4-3
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION[a]

Energy Type	Total Quantity	Annual Average Quantity During Construction
Electricity		
Construction Office	37,546 kWh	12,990 kWh
Electricity from Water (Dust Control)	1,652 kWh	572 kWh
Total Electricity	**39,199 kWh**	**13,562 kWh**
Gasoline		
On-Road Construction Equipment	98,493 gallons	34,076 gallons
Off-Road Construction Equipment	0 gallons	0 gallons
Total Gasoline	**98,493 gallons**	**34,076 gallons**
Diesel		
On-Road Construction Equipment	354,929 gallons	122,795 gallons
Off-Road Construction Equipment	406,700 gallons	140,707 gallons
Total Diesel	**761,629 gallons**	**263,502 gallons**

NOTES: kWh = kilowatt-hours

[a] Detailed calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2022.

As shown in Table 4.4-3, annual average construction electricity usage would be approximately 13,562 kWh and would be within the supply and infrastructure capabilities of SCE (82,048 GWh in system sales in 2021) and LADWP (forecasted to be 27,428 GWh net energy load in the 2026-

2027 fiscal year).[55,56] The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's net annual operational electricity. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Furthermore, the electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related air pollutant and GHG emissions from more traditional construction-related energy in the form of diesel fuel. Therefore, impacts from construction electrical demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Natural Gas

As stated above, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no expected demand generated by construction of the Project. Therefore, the Project would result in no impacts from construction natural gas demand and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Transportation Energy

Table 4.4-3 reports the estimated amount of petroleum-based transportation energy that is expected to be consumed during Project construction. Energy calculations are provided in Appendix F of this Draft EIR. During Project construction, on- and off-road vehicles would consume an estimated annual average of approximately 34,076 gallons of gasoline and approximately 263,502 gallons of diesel. Project construction activities would last for approximately 34 months. For comparison purposes only, and not for the purpose of determining significance, the fuel usage during Project construction would represent approximately 0.001 percent of the 2020 annual on-road gasoline-related energy consumption of 2,770,000,000 gallons and 0.043 percent of the 2020 annual diesel fuel-related energy consumption of 610,204,082 gallons in Los Angeles County,[57] as shown in Appendix F of this Draft EIR.

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. The Project would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). As such, the Project would indirectly comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce

55 Los Angeles Department of Water and Power defines its future electricity supplies in terms of sales that will be realized at the meter.

56 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.

57 California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010–2020, https://www.energy.ca.gov/media/3874. Accessed July 11, 2022. Diesel is adjusted to account for retail (49 percent) and non-retail (51 percent) diesel sales.

construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines. Further, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[58]

In addition, the Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, consistent with Culver City Municipal Code Sections 4.408.1 and 5.408.1 and Los Angeles City Council approved Ordinance No. 181519 (LAMC Chapter VI, Article 6, Section 66.32-66.32.5). Diversion of mixed construction and demolition debris would reduce truck trips to landfills, which are typically located some distance away from City centers, and would increase the amount of waste recovered (e.g., recycled, reused) at material recovery facilities, thereby further reducing transportation fuel consumption.

Based on the analysis above, construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize the Project's construction-related energy use. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste. Usage of these energy sources was calculated for the first full Project buildout year (2026). **Table 4.4-4**, *Summary of Annual Energy Use During Project Operation*, summarizes the Project's annual operational energy demand for electricity, natural gas, and gasoline and diesel transportation fuels.

TABLE 4.4-4
SUMMARY OF ANNUAL ENERGY USE DURING PROJECT OPERATION[a,b]

Energy Type	Annual Quantity[c]
Electricity	
Existing Site	
Building Energy (Culver City)	(52,980 kWh)
Building Energy (Los Angeles)	(1,151,231 kWh)
Water Conveyance (Culver City)	(136 kWh)
Water Conveyance (Los Angeles)	(13,284 kWh)
Subtotal Existing Site (Culver City)	**(53,117 kWh)**
Subtotal Existing Site (Los Angeles)	**(1,164,515 kWh)**
Total Existing Site	**(1,217,631 kWh)**

[58] BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

Energy Type	Annual Quantity[c]
Project	
Building 1 (Culver City)	
Building Energy	3,165,526 kWh
Water Conveyance	101,970 kWh
EV Charging	77,088 kWh
Building 1 Subtotal	**3,344,584 kWh**
Building 1 Net Subtotal	**3,291,467 kWh**
Building 2 (Los Angeles)	
Building Energy	8,399,850 kWh
Water Conveyance	276,043 kWh
EV Charging	118,844 kWh
Building 2 Subtotal	**8,794,737 kWh**
Building 2 Net Subtotal	**7,630,223 kWh**
Total Project Electricity	**12,139,321 kWh**
Total Net Electricity	**10,921,690 kWh**
Natural Gas	
Existing Site	
Building Energy	(673,949 cf)
Mobile Sources	(384,351 cf)
Total Existing Natural Gas	(1,058,301 cf)
Project	
Building Energy – Building 2	7,138,227 cf
Mobile Sources	1,250,945 cf
Total Project Natural Gas	**8,389,172 cf**
Total Net Natural Gas	**7,330,872 cf**
Transportation	
Existing Site	
Gasoline	(159,408 gallons)
Diesel	(23,179 gallons)
Project Site	
Total Project Gasoline	482,326 gallons
Diesel – Mobile Sources	80,033 gallons
Diesel – Emergency Generator	504 gallons
Total Project Diesel	80,538 gallons
Total Net Gasoline	**322,918 gallons**
Total Net Diesel	**57,539 gallons**

NOTES: kWh = kilowatt-hours; cf = cubic feet.

[a] Detailed calculations are provided in Appendix E of this Draft EIR.

[b] Project electricity and natural gas estimates assume compliance with applicable 2019 Title 24 and CALGreen Building Code requirements

[c] Totals may not add up exactly due to rounding of decimals.

SOURCE: ESA, 2022.

Electricity

Compliance with the most recent version of the Title 24 standards and applicable CALGreen Building Code requirements at Project buildout would result in a projected net increase in the on-site annual demand for electricity totaling 10,921,690 kWh for the Project, as shown in Table 4.4-4. Of the total, Building 1, which is located in Culver City and served by SCE, would use a net 3,291,467 kWh annually and Building 2, which is located in Los Angeles and served by LADWP, would use a net 7,630,223 kWh annually. The Project would achieve LEED Gold equivalent (refer to Project Design Feature GHG-PDF-1). The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. These measures were generally accounted for based on compliance with the most recent version of the Title 24 standards.

In addition, SCE and LADWP are required to update their long-term plans to demonstrate compliance including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030, and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The CEC estimates energy forecasts for SCE using socioeconomic and environmental indicators including geographical and climatic factors, population growth, employments rates, transportation electrification, advances in efficiency and conservation, and demand response programs.[59] LADWP generates its load forecast to account for regional economic and population growth based on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account, building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[60] In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would, therefore, account for the Project's electricity demand.[61]

The CEC estimates that SCE would record system sales of approximately 120,000 GWh in 2026.[62] Based on LADWP's collected data in its 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its net energy for load in the 2026-2027 fiscal year (the Project's first full buildout

59 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

60 Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, p. 70.

61 Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, p. 67.

62 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018, p. 97.

year) will be 27,428 GWh of electricity.[63,64] As such, the Project-related net increase in annual electricity consumption of 3,291,467 kWh at Building 1 would represent 0.003 percent of SCE's projected sales in 2026 and the annual electricity consumption of 7,630,223 kWh at Building 2 would represent 0.028 percent of LADWP's project sales in 2026. Both buildings would be within SCE's and LADWP's projected electricity supplies.

As previously described, the Project incorporates a variety of energy and water conservation measures and features to reduce energy usage and minimize energy demand. Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas

The Project would increase the demand for natural gas resources. With compliance with the most recent version of the Title 24 standards and CALGreen Building Code requirements, at buildout, the Project is projected to generate a net increase in the on-site annual demand for natural gas totaling 7,330,872 cf, as shown in Table 4.4-4.

SoCalGas accounts for anticipated regional demand based on various factors, including growth in employment by economic sector, growth in housing and population, and increasingly demanding State goals for reducing GHG emissions. SoCalGas accounts for an increase in employment and housing between 2018 to 2035. Furthermore, the 2020 California Gas Report estimates that natural gas supplies within SoCalGas' planning area will be 896,805 million cf in 2026 (the Project's first full buildout year).[65] As stated above, the Project's annual net increase in demand for natural gas is estimated to be 7,330,872 cf. The Project would account for 0.0008 percent of the 2026 forecasted annual consumption in SoCalGas' planning area and would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth.

As would be the case with electricity, the Project would comply with the applicable provisions of Title 24 and the CALGreen Building Code in effect at the time of building permit issuance to minimize natural gas demand. As such, the Project would minimize energy demand. Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. A majority of the vehicle fleet that would be used by Project visitors, residents, and employees would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards. Annual VMT for the Project was estimated using daily VMT from the City of Los Angeles VMT Calculator Tool and multiplying

63 Los Angeles Department of Water and Power defines its future electricity supplies in terms of sales that will be realized at the meter.

64 Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, p. 14.

65 California Gas and Electric Utilities, 2020 California Gas Report, 2018, p. 145.

daily VMT by 365 days per year. The VMT Calculator output is included in Appendix B of this Draft EIR.[66]

As shown in Table 4.4-4, the Project's estimated annual net increase in petroleum-based fuel usage would be 322,918 gallons of gasoline and 57,359 gallons of diesel for the Project. Based on the California Energy Commission's *California Annual Retail Fuel Outlet Report*, Los Angeles County consumed 2,770,000,000 gallons of gasoline and 610,204,082 gallons of diesel fuel in 2020.[67] The Project would account for 0.012 percent of County gasoline consumption and 0.0094 percent of County diesel consumption based on the available County fuel sales data for the year 2020.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[68] The Project would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also indirectly benefit from Pavley Standards, which are designed to reduce vehicle GHG emissions by mandating increasingly stringent emissions standards on new vehicles but would also result in fuel savings from more efficient engines in addition to compliance with CAFE standards.

The Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles for the reasons provided below. As discussed in detail in Section 4.6, *Greenhouse Gas Emissions*, the Project Site is located within a High Quality Transit Area (HQTA), which SCAG defines as "corridor-focused Priority Growth Areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours."[69] The 2020–2045 RTP/SCS encourages increasing the density of development within HQTAs and other infill locations, to reduce VMT and trips.[70]

The Project would concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. The Project is well serviced by transit, the existing fixed-route intercampus shuttle program, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) E Line and several bus routes serviced by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro E Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, Santa Monica Big Blue Bus Line 17, and LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and

66 City of Los Angeles, VMT Calculator. Provided in Appendix B of this Draft EIR.

67 California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010–2020, https://www.energy.ca.gov/media/3874. Accessed July 11, 2022. Diesel is adjusted to account for retail (49 percent) and non-retail (51 percent) diesel sales.

68 BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

69 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 51 and 91.

70 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 50–51.

the existing fixed-route intercampus shuttle program as part of the Project's TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, which runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project (also known as the Tactical Mobility Lane Pilot project), dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular fuel consumption. In addition, the Project will promote alternatives to conventionally fueled automobiles by installing 122 EV charging stations.

Based on the above, the Project would minimize operational transportation fuel demand consistent with State, regional, and City goals. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

The Effects of the Project on Local and Regional Energy Supplies and on Requirements for Additional Capacity

Construction

Electricity

As discussed above, electricity would be consumed during Project construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity would be supplied to the Project Site by SCE and LADWP and would be obtained from the existing electrical lines that connect to the Project Site. While temporary power poles would be installed to provide electricity during Project construction, the existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. Electricity demand during Project construction would be 0.11 percent of the Project's net annual operational electricity consumption and would be 1.11 percent of the existing site's electricity demand, which would be within the supply and infrastructure capabilities of both SCE and LADWP and, thus, would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site.

Transportation Fuel

As stated above, transportation fuel usage during Project construction activities would represent 0.0012 percent of gasoline usage and 0.043 percent of diesel usage within Los Angeles County, respectively. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site, and, as such, no new facilities would be required. Energy consumption during construction be temporary and short-term, and energy supplies of the existing providers would be sufficient to serve the project in addition to existing commitments. As such, the Project would not affect the local and/or regional energy supplies and would not require additional capacity.

Operation

Electricity

Based on LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its net energy for load in the 2026-2027 fiscal year (the Project's first full buildout year) will be 26,748 GWh of electricity[71,72] and SCE reported system sales of 82,048 GWh in 2021[73] (the latest available data). The Project-related increase in annual electricity consumption of 3,292 MWh/year at Building 1 would represent 0.003 percent of SCE's projected system sales for 2026 and the annual electricity consumption of 7,630 MWh at Building 2 would represent 0.028 percent of LADWP's projected energy sales in 2026. Energy consumption from both buildings would be consistent with SCE and LADWP's anticipated regional demand from population or economic growth. During peak conditions, the Project would represent 0.003 percent of the SCE estimated peak load and 0.028 percent of the LADWP estimated peak load. Further, both SCE and LADWP has issued a will-serve letter confirming that the Project is part of the total load growth forecast and has been taken into account in the planned growth of LADWP's power systems.[74] Based on these factors, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand, and, thus, the Project would not require additional infrastructure (i.e., a substation) beyond the aforementioned proposed utilities installed on-site during construction.

Natural Gas

As stated above, the Project's estimated annual net increase in demand for natural gas would be 7,330,872 cf. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates that natural gas consumption within SoCalGas' planning area will be 896,805 million cf in 2026 (the Project's first full buildout year).[75] This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. The Project would account for 0.0008 percent

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71 Los Angeles Department of Water and Power defines its future electricity supplies in terms of sales that will be realized at the meter.

72 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.

73 Edison International and SCE, 2021 Annual Report, 2022, p. 2, https://www.edison.com/home/investors/financial-reports-information/annual-reports.html. Accessed July 11, 2022.

74 KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, Exhibits 4 and 11. Provided in Appendix P of this Draft EIR.

75 California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 145.

of the 2026 forecasted consumption in SoCalGas' planning area and would fall within SoCalGas' projected consumption and supplies for the area. SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and economic growth, with efficiency improvements and the State's transition away from electricity generated by fossil fuels, including natural gas, to increased renewable energy. The 2020 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 1.0 percent per year from 2020 to 2035.[76] The decline in throughput demand is due to modest growth in the natural gas vehicle market and across-the-board declines in other market segments." As such, SoCalGas' existing and planned natural gas capacity, supplies and infrastructure would be sufficient to serve the Project's demand.

Transportation Energy

As stated above, at buildout, the Project would consume a net increase of 322,918 gallons of gasoline and 57,359 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent 0.012 percent of the 2020 annual on-road gasoline- and 0.0094 percent of the 2020 annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data). Detailed calculations are shown in Appendix E of this Draft EIR. Operational transportation energy would be provided by existing retail service stations, and, as such, no new retail service stations would be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be produced from domestic supplies or imported from various regions around the world, and based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[77] As such, existing and planned transportation fuel supplies would be sufficient to serve the Project's demand. In addition, the Project would provide EV charging stations, which would serve to incentivize the use of hybrid or full electric vehicles, thereby reducing the reliance on transportation fuels. As energy consumption during operation would be relatively negligible and within existing and planned supplies, the Project would not affect the local and/or regional energy supplies and would not require additional capacity.

The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of SCE's and LADWP's power grid and base load conditions and would be consistent with expected levels of electricity demand. SCE's base case peak demand would be 26,533 MW in 2026 and LADWP's base case peak demand for the power grid is 6,129 MW in 2026–2027.[78,79] Under peak conditions, the Project would consume a net increase of 3,292 MWh at Building 1 and 7,630 MWh at Building 2 on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to 0.75 MW at Building 1 and 1.7 MW at Building 2 (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the SCE base peak load of 26,533 MW and LADWP power

76 California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 37

77 BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

78 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.

79 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

grid base peak load of 6,129 MW for 2025-2026, based on the assumption above, the Project would represent 0.003 percent of the SCE base peak load conditions and 0.028 percent of the LADWP base peak load conditions and, therefore, would not create any new peak demand impacts that are inconsistent with SCE or LADWP demand projections. Therefore, the Project's electrical consumption during operational activities would have a negligible effect on peak load conditions of the power grid and is within existing and planned demand.

The Effects of the Project on Energy Resources

Electricity

As discussed above, SCE's and LADWP's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP 2017 Power Strategic Long-Term Resource Plan and the CEC's California Energy Demand 2018-2030 Revised Forecast identify adequate energy resources to support future generation capacity, and, as discussed above, SCE's and LADWP's existing and planned electricity capacity and supplies would be sufficient to serve the Project's electricity demand.[80, 81] As discussed above in the Regulatory Framework, one of the objectives of SB 350 was to increase the procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, SCE and LADWP are required to procure at least 33 percent to 50 percent of its energy portfolio from renewable sources by 2030. SCE and LADWP are on track to hit their power goals and interim targets. SCE and LADWP have committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the RPS requirements. Prior to the passage of SB 100 in September 2018, LADWP committed to exceeding the then-current RPS requirements by increasing to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036.[82] With the passage of SB 100, SCE and LADWP will be required to update its long-term plans to demonstrate compliance with the updated requirements including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030 and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Building Code. The Applicant would also comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code.

80 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-25. "the 2017 SLTRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available."

81 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

82 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-3.

Natural Gas

As discussed above, natural gas supplied to the Southern California area is mainly sourced from out-of-state with a small portion originating in California. According to the U.S. Energy Information Administration (EIA), the U.S. currently has approximately 90 years of natural gas reserves based on 2016 consumption.[83] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years.[84] Therefore, as the Project would comply with energy efficiency standards for natural gas, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation Fuel

As stated earlier in the discussion, transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[85] Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

Based on the above, the Project would minimize construction and operational energy and transportation fuel demand to the extent feasible and would not substantially impact energy resources. Therefore, construction and operation of the Project would not have a significant impact on energy resources.

The Project's Projected Transportation Energy Use Requirements and its Overall Use of Efficient Transportation Alternatives

As discussed in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, the SCAG 2020–2045 RTP/SCS presents the transportation vision for the region through the year 2045 and provides a long-term investment framework for addressing the region's transportation and related challenges. As shown in Exhibit 3.8 of the SCAG 2020–2045 RTP/SCS, the Project Site is located within an HQTA, which SCAG defines as "corridor-focused Priority Growth Areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours."[86] The 2020–2045 RTP/SCS encourages increasing the density of development within HQTAs and other infill locations, to reduce VMT and trips.[87]

The Project would concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. The Project is well serviced by transit, the existing fixed-route intercampus shuttle program, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metro E Line and

83 U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? Last updated April 9, 2018, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed July 11, 2022.

84 California Energy Commission, Tracking Progress – Energy Efficiency. Last updated September 2018.

85 BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

86 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 51 and 91.

87 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 50-51.

several bus routes serviced by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro E Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, Santa Monica Big Blue Bus Line 17, and LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, which runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular fuel consumption. In addition, the Project would promote alternatives to conventionally fueled automobiles by installing 122 EV charging stations.

As a result, operation of the Project would encourage reduced transportation energy and provide Project visitors and employees with multiple convenient alternative transportation options. Therefore, the Project encourages the use of efficient transportation energy use and efficient transportation alternatives.

Mitigation Measures

Impacts regarding wasteful, inefficient, and unnecessary consumption of energy were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding wasteful, inefficient, and unnecessary consumption of energy were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold ENE-2: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis

Construction

As discussed below, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles and are phased in for model years 2014 through 2018 and result in a reduction

in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[88] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which would be phased in from model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[89] The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

Based on the above, Project construction activities would not conflict with energy conservation plans and impacts would be less than significant.

Operation

A detailed discussion of the Project's comparison with the applicable actions and strategies in the Los Angeles Green New Deal, Los Angeles' Green Building Code, and Culver City's Green Building Program, is provided in Section 4.6, *Greenhouse Gas Emissions*. As discussed, the Project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Building Code, which have been incorporated into the Culver City's Green Building Program and Los Angeles' Green Building Code. In addition, the Project would achieve LEED Gold equivalent (refer to Project Design Feature GHG-PDF-1). The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation.

Electricity and natural gas usage during Project operations, as presented in Table 4.4-4, would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Building Code requirements, and the Los Angeles Green Building Code. Furthermore, as noted above, the

88 USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

89 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

Project incorporates energy-conservation measures that would achieve LEED Gold equivalent (refer to Project Design Feature GHG-PDF-1).

The Project would also be consistent with and not conflict with regional planning strategies that address energy conservation. As discussed above and in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focus on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's design and its location on an infill site within an HQTA in proximity to transit; its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations; and its walkable environment would achieve a reduction in VMT. These land use characteristics are included in the transportation fuel demand for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in Section 4.2*, Air Quality,* and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would also benefit from fuel and automotive manufacturers' compliance with CAFE fuel economy standards and the Pavley Standards, which are designed to result in more efficient use of transportation fuels. In addition, the existing fixed-route intercampus shuttle program as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project.

As a result, the Project would implement project design features and incorporate water conservation, energy conservation, landscaping, and other features consistent with applicable actions and strategies in the Los Angeles Green New Deal. The Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant.

Mitigation Measures

Impacts regarding conflicts with or obstructing a state or local plan for renewable energy or energy efficiency were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding conflicts with or obstructing a state or local plan for renewable energy or energy efficiency were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.4.4 Cumulative Impacts

Impact Analysis

Wasteful, Inefficient and Unnecessary use of Energy

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Chapter 3, *Environmental Setting*, of this Draft EIR, Table 3-1, the City of Culver City, as lead agency for the Project, has identified 52 related projects located within the vicinity of the Project Site. Of the 52 related projects, 34 are located within the City of Culver City and 18 are located within the City of Los Angeles. The geographic context for the analysis of cumulative impacts on electricity is SCE's and LADWP's service areas, and the geographic context for the analysis of cumulative impacts on natural gas is SoCalGas' service area, because the Project and related projects are located within the service boundaries of SCE, LADWP, and SoCalGas. While the geographic context for transportation-related energy use is more difficult to define, the Project is considered in the context of County-wide consumption given the tendency for vehicles to travel within and through the County and the availability of County-level data. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity

Buildout of the Project, related projects, and additional forecasted growth in SCE's and LADWP's service areas would cumulatively increase the demand for electricity supplies and on infrastructure capacity. However, SCE and LADWP, in coordination with the CEC, account for future increases in service area demand based on various economic, population, and efficiency factors. SCE and LADWP rely on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, PEV projections from the CEC account, building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[90, 91] As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.[92] The 2017 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[93] Accordingly, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would, therefore, account for the Project's and the related

90 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. 70.

91 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

92 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-2.

93 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-2.

projects' electricity demand within its forecasts.[94] SCE has determined that the use of energy resources would be minor compared to existing supply and infrastructure within the SCE service area and would be consistent with growth expectations.[95] Thus, SCE and LADWP consider growth from related projects within its service area for the increase in demand for electricity, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could affect future availability, the Project's use of such resources would be on a relatively small scale and would be reduced by measures rendering the Project more energy efficient. The Project would also incorporate additional energy efficiency measures, including LEED Gold certification equivalent (refer to Project Design Feature GHG-PDF-1). Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for more information. Further, LADWP has issued a will-serve letter confirming that the Project is part of the total load growth forecast and has been taken into account in the planned growth of the regional power system.[96] Related projects, as with the Project, would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of electricity, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, Los Angeles' Green New Deal, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to local and regional supplies or capacity based on regional growth plans, such as the SCAG 2020–2045 RTP/SCS, and SCE and LADWP energy supply projections for long-term planning. Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters (which take into account all current uses and projected future development projects) for each related project confirming availability of adequate electricity supplies and infrastructure as part of the total load growth of the regional power system.

Additionally, as discussed above, SCE and LADWP are required to procure 60 percent renewables by 2030 and 100 percent renewables by 2045 and are on track to hit their RPS targets. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. Therefore, the Project and related projects would comply with the energy conservation plans and efficiency standards required to ensure efficient energy use.

As such, the Project's impact, when considered together with related projects, would not be cumulatively considerable and would not result in cumulatively significant impacts related to wasteful, inefficient or unnecessary use of electricity.

94 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. 67.

95 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

96 KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, Exhibits 4 and 11. Provided in Appendix P of this Draft EIR.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and on infrastructure capacity. As stated above, based on the 2020 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 896,805 million cf in 2026 (the Project's first full buildout year).[97] The Project would account for 0.0008 percent of the 2026 forecasted consumption in SoCalGas' planning area. SoCalGas forecasts consider projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections. Additionally, as with the Project, each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects, and SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Natural gas infrastructure is expanded and improved in response to increasing demand and it is expected that SoCalGas would continue to expand delivery capacity if necessary to meet growth requirements in the service area. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, would be consistent with regional and local growth expectations for SoCalGas' service area, and would not result in the need to construct new or expand existing natural gas facilities or distribution lines.

Related projects, as with the Project, would be required to evaluate natural gas impacts during construction and operation related to the wasteful, inefficient or unnecessary use of natural gas, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, Los Angeles' Green New Deal, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. As with the Project, related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a total net increase of 322,918 gallons of gasoline and 57,359 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent between 0.012 percent of the 2020 annual on-road gasoline- and 0.0094

[97] California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 145.

percent of the annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data), as shown in Appendix E of this Draft EIR.

Additionally, as described above, petroleum currently accounts for 72 percent of California's transportation energy sources[98]; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT, which would reduce reliance on petroleum fuels.

Construction of the Project and related projects would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. The Project and related projects would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). As such, the Project and related projects would indirectly comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and a reduction in overall VMT. The Project Site is an infill location close to jobs, off-site housing, shopping and entertainment uses and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The Project would concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. Therefore, operation of the Project would provide visitors and employees with transportation options that would limit VMT and transportation fuel consumption, and would not result wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

The 2020–2045 RTP/SCS is a regional planning tool that address cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, as with the Project, the related projects would similarly be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions that would not be in conflict with applicable provisions of the SCAG 2020–2045 RTP/SCS for the land use type. For more information on the Project's consistency with SCAG 2020–2045 RTP/SCS, refer to Table 4.6-8 of Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

98 U.S. Energy Information Administration, California Energy Profile Overview, 2021, https://www.eia.gov/state/?sid=CA#tabs-1. Accessed July 11, 2022.

Since the Project would not conflict with the 2020–2045 RTP/SCS, the Project's contribution to cumulative impacts due to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and transportation energy) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient and unnecessary consumption of energy during construction or operation. As such, cumulative energy impacts under Threshold ENE-1 would be less than significant.

Consistency with State or Local Plan

Electricity

The Project would also incorporate energy and water efficiency measures outlined in Section 4.6, *Greenhouse Gas Emissions*, which include LEED Gold equivalent (refer to Project Design Feature GHG-PDF-1). Related projects, as with the Project, would be required to evaluate electricity conservation features, comply with applicable electricity efficiency plans and standards, including Los Angeles' Green Building Code, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the Los Angeles Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SCE and LADWP energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. However, as discussed above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections.

Related projects, as with the Project, would be required to evaluate natural gas conservation features and compliance with applicable regulations, including the Los Angeles Green Building Code, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the Los Angeles Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SoCalGas energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. However, as discussed above, the Project would not conflict with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS. As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and achieve a reduction in VMT compared to a standard non-infill project and based on its location near a diverse mix of land uses and public transit options.

The 2020–2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project, and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, related projects would be required to implement mitigation measures, as needed, if found to be in conflict with applicable provisions of the SCAG 2020–2045 RTP/SCS for the land use type.

Since the Project would not conflict with the 2020–2045 RTP/SCS, the Project's contribution to cumulative impacts related to potentially significant environmental impacts due to conflicting with or obstruction of a state or local plan for transportation energy efficiency would not be cumulatively considerable and, thus, would be less than significant.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold ENE-2 would be less than significant.

Mitigation Measures

Cumulative impacts with regard to energy use would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts during construction and operation of the Project would be less than significant without mitigation. When considered together with related projects, energy impacts would not result in a cumulatively considerable impact. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.5 Geology and Soils

4.5.1 Introduction

This section evaluates potential geologic and soils hazards associated with the Project, including the potential for the Project to cause direct or indirect impacts associated with existing environmental conditions that could cause, in whole or in part, fault rupture, ground shaking, liquefaction of soils, landslides, erosion, placement on unstable geologic units or soils, expansion of soils, and/or destruction of unique paleontological resources or geologic features. Impacts regarding geology and soils are based on geotechnical engineering investigations conducted for the Project and reported in *Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Los Angeles, California* (Geotechnical Report), prepared by Geotechnologies, Inc., and dated February 2, 2022. Impacts regarding paleontological resources is based on the *Crossings Campus, City of Culver City and City of Los Angeles, California, Paleontological Resources Assessment Report* (Paleontological Resources Assessment Report) prepared by Environmental Science Associates (ESA) and dated July 2022. The Geotechnical Report is included as Appendix F, and the Paleontological Resources Assessment Report is included as Appendix G of this Draft EIR.

4.5.2 Environmental Setting

Regulatory Framework

There are existing plans, regulations, and programs that include policies, requirements, and guidelines regarding geology, seismicity, and soils at the federal, State, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Earthquake Hazards Reduction Act
- National Pollutant Discharge Elimination System Program
- Alquist-Priolo Earthquake Act
- Seismic Hazards Mapping Act
- California Building Code
- National Pollutant Discharge Elimination System Construction General Permit
- California Penal Code Section 622.5
- California Public Resources Code Section 5097.5
- California Environmental Quality Act
- Society for Vertebrate Paleontology Standard Guidelines
- Los Angeles Regional Quality Control Board's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering
- Culver City General Plan – Public Safety Element
- Culver City General Plan – Seismic Safety Element

- Culver City Municipal Code and Building Code
- Los Angeles General Plan – Safety Element
- Los Angeles General Plan – Conservation Element
- Los Angeles Municipal Code

Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1977 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Earthquake Hazards Reduction Act established the National Earthquake Hazards Reduction Program (NEHRP). This program was substantially amended by the NEHRP Reauthorization Act of 2004 (Public Law 108-360). NEHRP's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The NEHRP designates the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under NEHRP help inform and guide local planning and building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which a proposed project would be required to adhere.

National Pollutant Discharge Elimination System Program

The National Pollutant Discharge Elimination System (NPDES) Program has been responsible for substantial improvements to our nation's and state's water quality since 1972. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of Best Management Practices (BMPs). NPDES permits are required by Section 402 of the Clean Water Act.[1]

State

Alquist-Priolo Earthquake Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act) was signed into law December 22, 1972 (revised in 1994), and codified into State law in the California Public Resources Code (PRC) as Division 2, Chapter 7.5 to address hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating development near active faults. As required by the Act, the State has delineated Earthquake Fault Zones (formerly Special Studies Zones) along known active faults in California, which vary in width around the fault trace from about 200 to 500 feet on either side of the fault trace. Cities and counties affected by the zones must regulate certain development projects within the zones. The State Geologist is also required to issue appropriate maps to assist cities and counties in planning, zoning,

[1] United States Environmental Protection Agency (USEPA), Clean Water Act, Section 402: National Pollutant Discharge Elimination System, https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system. Accessed January 11, 2022.

and building regulation functions. Local agencies enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requires. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project that is within an Alquist-Priolo Earthquake Fault Zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a distance to be established by a California Certified Engineering Geologist. Although setback distances may vary, a minimum 50-foot setback is typically required.

Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plans and to encourage the adaptation of land use management policies and regulations to reduce and mitigate seismic hazards to protect public health and safety. Under PRC Section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a geotechnical report defining and delineating any seismic hazard.

California Building Code

The California Building Code (CBC), which is codified in Title 24 of the California Code of Regulations, Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The 2019 edition of the CBC is based on the 2018 International Building Code (IBC) published by the International Code Council. The code is updated triennially, and the 2019 edition of the CBC was published by the California Building Standards Commission on July 1, 2019, and became effective January 1, 2020. Every three years, the State adopts new codes (known collectively as the California Building Standards Code) to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. Sections 17922, 17958, and 18941.5 of the California Health and Safety Code require that the latest edition of the California Building Standards Code apply to local construction

180 days after publication. The significant changes to Title 24 in the 2019 edition can be found at California Department of General Services website.[2]

All proposed structures are required to be designed and constructed in accordance with the 2019 edition of the CBC, as amended by the City of Culver City and the City of Los Angeles, and with other applicable laws and regulations. Specific relevant CBC requirements, in addition to designing and constructing buildings to code, include but are not limited to, the following:

- CBC Section 1803 (Detailed Geotechnical Investigations): CBC Section 1803 requires the preparation of a detailed geotechnical investigation, prepared to ASTM standards by a State licensed Geotechnical Engineer and using ASTM procedures, prior to design and construction. As required therein, the detailed geotechnical investigation must: (1) address fault rupture, seismic ground shaking, liquefaction, lateral spreading, settlement, subsidence, slope stability, and expansive and collapsible soils; and (2) include a literature review, subsurface testing (e.g., borings), laboratory testing of collected soils, analysis, and geotechnical engineering recommendations for project foundations, footings, and other construction and design elements. Per City requirements, the detailed geotechnical investigation must be submitted with the Site Improvement/Grading Plan. Compliance with the geotechnical engineering recommendations in a detailed geotechnical investigation would ensure that the site-specific geotechnical and soils hazards at a project site are taken into account during design and construction and properly mitigated.[3,4]
- CBC Section 1805.1.3 (Groundwater Control): Where dewatering is required, CBC Section 1805.1.3 requires that the design of the system to lower the groundwater table shall be based on accepted principles of engineering that consider issues that include, but are not necessarily limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate, and the rated capacity of the disposal area for the system. Consideration of these issues would ensure that any dewatering systems are properly sized and designed to accommodate the dewatering required.
- CBC Section 1304 (Excavation, Grading and Fill): CBC Section 1304 identifies specific slope limitations, compaction requirements, placement of fill requirements, and other grading requirements for excavation, grading and fill. These requirements have been formulated to ensure the safe and proper support of new buildings/structures.
- CBC Section J104.3 (Grading Permit Requirements – Geotechnical/Soils Report): Per CBC Section J104.3, a geotechnical report prepared by a registered design professional shall be required for a grading permit. The report shall contain at least: (1) the nature and distribution of existing soils; (2) conclusions and recommendations for grading procedures; (3) soil design criteria for any structures or embankments required to accomplish the proposed grading; and (4) where necessary, slope stability studies, and recommendations and conclusions regarding site geology. Per City of Culver City and the City of Los Angeles requirements, a final compaction report is also required. Compliance with these requirements would ensure that grading occurs in a safe manner and would provide for the safe and proper support of new buildings/structures.

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2 Department of General Services, Building Standards Commission, California Building Standards Code, https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo/. Accessed January 11, 2022.

3 The geotechnical and soils issues listed are those required by CBC Section 1803.5.12 be addressed in detailed geotechnical reports for projects in USGS Seismic Design Categories D through F (e.g., areas subject to potentially strong seismic ground shaking).

4 The geotechnical investigation determined the Project Site is in Seismic Design Category D.

- CBC Section J104.5 (Grading Permit Requirements – Liquefaction Study): For sites with mapped maximum considered earthquake spectral response accelerations at short periods greater than 0.5g, a study of the liquefaction potential of the site shall be provided and the recommendations incorporated into the grading plan. Compliance with this requirement would ensure that any grading and other earthwork takes into account the potential for liquefaction at the site and, along with the design of foundations, footings, and other design elements, would mitigate potential liquefaction hazard.

National Pollutant Discharge Elimination System Construction General Permit

Construction associated with the Project would disturb more than one acre of land surface affecting the quality of stormwater discharges into waters of the U.S. The Project would, therefore, be subject to the *NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities* (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Construction General Permit regulates discharges of pollutants in stormwater associated with construction activity to waters of the U.S. from construction sites that disturb one acre or more of land surface, or that are part of a common plan of development or sale that disturbs more than one acre of land surface. The permit regulates stormwater discharges associated with construction or demolition activities, such as clearing and excavation; construction of buildings; and linear underground projects, including installation of water pipelines and other utility lines.

The Construction General Permit requires that construction sites be assigned a Risk Level of 1 (low), 2 (medium), or 3 (high), based both on the sediment transport risk at the site and the receiving waters risk during periods of soil exposure (e.g., grading and site stabilization). The sediment risk level reflects the relative amount of sediment that could potentially be discharged to receiving water bodies and is based on the nature of the construction activities and the location of the site relative to receiving water bodies. The receiving waters risk level reflects the risk to the receiving waters from the sediment discharge. Depending on the risk level, the construction projects could be subject to the following requirements:

- Effluent standards;
- Good site management "housekeeping;"
- Non-stormwater management;
- Erosion and sediment controls;
- Run-on and runoff controls;
- Inspection, maintenance, and repair; or
- Monitoring and reporting requirements.

The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes specific best management practices (BMPs) designed to prevent sediment and pollutants from contacting stormwater from moving off-site into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management and good housekeeping, and are intended to protect surface water quality by preventing the off-site migration of eroded soil and construction-related pollutants from

the construction area. Routine inspection of all BMPs is required under the provisions of the Construction General Permit.

The SWPPP must be prepared before the construction begins. The SWPPP must contain a site map(s) that delineates the construction work area, existing and proposed buildings, parcel boundaries, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project area. The SWPPP must list BMPs and the placement of those BMPs that the applicant would use to protect stormwater runoff. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Examples of typical construction BMPs include scheduling or limiting certain activities to dry periods, installing sediment barriers such as silt fence and fiber rolls, and maintaining equipment and vehicles used for construction. Non-stormwater management measures include installing specific discharge controls during certain activities, such as paving operations, vehicle and equipment washing and fueling. The Construction General Permit also sets post-construction standards (i.e., implementation of BMPs to reduce pollutants in stormwater discharges from the site following construction).

In the Project area, the Construction General Permit is implemented and enforced by the Los Angeles Regional Water Quality Control Board, which administers the stormwater permitting program. Dischargers must electronically submit a notice of intent and permit registration documents to obtain coverage under this Construction General Permit. Dischargers are to notify the Los Angeles Regional Water Quality Control Board of violations or incidents of non-compliance, and submit annual reports identifying deficiencies in the BMPs and explaining how the deficiencies were corrected. The risk assessment and SWPPP must be prepared by a State Qualified SWPPP Developer, and implementation of the SWPPP must be overseen by a State Qualified SWPPP Practitioner. A legally responsible person, who is legally authorized to sign and certify permit registration documents, is responsible for obtaining coverage under the permit.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

California Public Resources Code Section 5097.5

PRC Section 5097.5 provides protection for paleontological resources on public lands, where Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

California Environmental Quality Act

CEQA requires that public agencies identify the environmental consequences of their proposed projects and project approvals and as such, paleontological resources are afforded consideration under CEQA. Appendix G of the CEQA guidelines (Title 14, Division 6, Chapter 3, California Code of Regulations: 15000 et seq.) includes as one of the questions to be answered in the Environmental Checklist (Appendix G, Section V, Part c) the following: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Other State requirements for paleontological resource management are in PRC Chapter 1.7, Section 5097.5 through 5097.9 (Stats. 1965, c. 1136, p. 2792), Archaeological, Paleontological, and Historical Sites. This statute defines any unauthorized disturbance or removal of a fossil site or remains on public land as a misdemeanor and specifies that State agencies may undertake surveys, excavations, or other operations as necessary on State lands to preserve or record paleontological resources. CEQA documentation prepared for projects would be required to analyze paleontological resources as a condition of the CEQA process to disclose potential impacts.

Society for Vertebrate Paleontology Standard Guidelines

As discussed above, PRC Section 5097.5 and the California Environmental Quality Act Statute require protection of paleontological resources. Although not as formal regulation per se, the Society for Vertebrate Paleontology (SVP) has established standard guidelines that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation.[5] The SVP guidelines are the industry standard. As defined by the SVP, significant nonrenewable paleontological resources are:[6]

> *Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.*

As defined by the SVP, significant fossiliferous deposits are:[7]

> *A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and*

5 Society of Vertebrate Paleontology (SVP), Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

6 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

7 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

> *climatic information). Palaeontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].*

Based on the significance definitions of the SVP, all identifiable vertebrate fossils are considered to have significant scientific value.[8] This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

Regional

Los Angeles Regional Water Quality Control Board's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering

The California Water Code (CWC) authorizes the State Water Resources Control Board (SWRCB) and its Regional Water Quality Control Boards to implement provisions of the Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. In regard to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the underground parking structure and building foundations. Under the CWC, discharges of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited unless conducted in compliance with a Waste Discharge Requirement (WDR) permit. In addition to the CWC, these permits implement and are in compliance with the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. In accordance with these legal requirements, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB)'s *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, pursuant to adopted Order No. R4-2013-0095, or any other appropriate WDR permit identified by the LARWQCB.[9] Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards. If, for example, extracted groundwater contains Total Petroleum Hydrocarbons (TPH) or other petroleum breakdown compounds in concentrations exceeding water quality standards, compliance with legal requirements would mandate treatment to meet published State water quality standards prior to discharge into a storm drain system.

[8] SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

[9] Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

Local

City of Culver City

Culver City General Plan – Public Safety Element

The 1975 Public Safety Element of the City's General Plan identifies and defines programs to protect the community from fire, and geologic hazards.[10] Relevant policies in the Public Safety Element include the following:

> Policy 1: Establish and enforce standards and criteria to reduce unacceptable levels of fire and geologic risk.
>
> Policy 5: Develop stringent site criteria for construction in areas with fire and/or geologic problems and prohibit construction if these criteria are not met.
>
> Policy 9: Require all new development and selected existing development to comply with established fire and geologic safety standards.

Culver City General Plan – Seismic Safety Element

The 1974 Seismic Safety Element of the City's General Plan identifies and appraises the seismic hazards in the City, such as susceptibility to fault rupture, seismic ground shaking, and seismically-induced ground failure.[11] While primarily a geologic hazards appraisal rather than a policy document, the Seismic Safety Element does include a limited number of policies, including the relevant policies below:

> Liquefaction: Areas of shallow groundwater (less than 50 feet in depth) should be considered potentially problematic in terms of liquefaction and, therefore, should be evaluated in terms of seismic design.
>
> Landslides and Slope Stability: Evaluation of slope stability for natural, man-made or proposed slopes must include geologic-soils evaluation of these factors (e.g., nature of bedrock underlying the site, proximity to faulting, structural dip of bedding plans, slope angle, presence of ancestral slope failures, groundwater levels) which, in turn, must be based on detailed field and laboratory observations by the geologist and soils engineer.
>
> Soils Investigations: Soils investigations should be required for all development within the City. Problems of expansive and boggy soils conditions will be particularly important considerations by the soils engineer. Potentially high groundwater conditions could result in the future and should receive the attention of the soils engineer.

Culver City Municipal Code and Building Code

Per City of Culver City Municipal Code Chapter 15.02, Buildings, Structures, and Equipment, of the Culver City Municipal Code contains the City's Building Code, which incorporates by reference the CBC, with City amendments for additional requirements. The Building Safety Division (BSD) is responsible for implementing the provisions of the City's Building Code. To that end, BSD issues building and grading permits for construction projects. Building permits are required for any building or structure that is erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted, or demolished. Grading permits are required for all grading projects other than those

[10] City of Culver City, Culver City General Plan – Public Safety Element, July 1975.
[11] City of Culver City, Culver City General Plan – Seismic Safety Element, May 1974, updated January 1977.

specifically exempted by the City's Building Code. BSD has the authority to withhold building permit issuance if a project cannot mitigate potential hazards to the project or which are associated with the project. Throughout the permitting, design, and construction phases of a building project, BSD engineers and inspectors confirm that the requirements of the City's Building Code pertaining specifically to geoseismic and soils conditions are being implemented by project architects, engineers, and contractors. By adoption of the CBC, the City requires a detailed Final Geotechnical Report with final design recommendations prepared by a California-registered geotechnical engineer and submitted to the BSD for review prior to issuance of a grading permit.[12] Final foundation design recommendations must be developed during final project design, and other deep foundation systems that may be suitable would be addressed in the detailed Final Geotechnical Report. All earthwork (e.g., excavation, site preparation, any fill backfill placement) must be conducted with engineering control under observation and testing by the geotechnical engineer and in accordance with CBC.

City of Los Angeles

Los Angeles General Plan – Safety Element

The City's General Plan Safety Element, which was adopted in 1996, addresses public safety risks due to natural disasters, including seismic events and geologic conditions, and sets forth guidance for emergency response during such disasters. The Safety Element also provides maps of designated areas within Los Angeles that are considered susceptible to earthquake-induced hazards, such as fault rupture and liquefaction.

Los Angeles General Plan – Conservation Element

The City's General Plan Conservation Element recognizes paleontological resources in Section 3: "Archeological and Paleontological" (II-3) and identifies protection of paleontological resources as an objective (II-5). The General Plan identifies site protection as important, stating, "Pursuant to CEQA, if a land development project is within a potentially significant paleontological area, the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of paleontological resources. As stated therein, it is the City's policy that paleontological resources be protected for historical, cultural research, and/or educational purposes. Section 3 sets as an objective the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities." Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.[13]

[12] California Building Code, 2019 Part 2, Volume 1, Chapter 18, Soils and Foundations, Section 1803, Geotechnical Investigations.

[13] City of Los Angeles General Plan, Conservation Element, pp. II-6 to II-9.

Los Angeles Municipal Code

Chapter IX of the LAMC contains the City's Building Code, which incorporates by reference the CBC, with City amendments for additional requirements. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the LAMC. To that end, LADBS issues building and grading permits for construction projects. Building permits are required for any building or structure that is erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted, or demolished. Grading permits are required for all grading projects other than those specifically exempted by the LAMC. LADBS has the authority to withhold building permit issuance if a project cannot mitigate potential hazards to the project or which are associated with the project. Throughout the permitting, design, and construction phases of a building project, LADBS engineers and inspectors confirm that the requirements of the LAMC pertaining specifically to geoseismic and soils conditions are being implemented by project architects, engineers, and contractors.

The function of the City's Building Code, which comprises Chapter IX of the LAMC, is to protect life safety and ensure compliance with the LAMC. Chapter IX addresses numerous topics, including earthwork and grading activities, import and export of soils, erosion and drainage control, and general construction requirements that address flood and mudflow protection, landslides, and unstable soils. Additionally, the LAMC includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater.

Specifically, Chapter IX of LAMC Div. 18, Sec. 91.1803, requires a detailed Final Geotechnical Report with final design recommendations prepared by a California-registered geotechnical engineer and submitted to the LADBS for review prior to issuance of a grading permit.[14] Final foundation design recommendations must be developed during final project design, and other deep foundation systems that may be suitable would be addressed in the detailed Final Geotechnical Report. All earthwork (i.e., excavation, site preparation, any fill backfill placement, etc.) must be conducted with engineering control under observation and testing by the Geotechnical Engineer and in accordance with LADBS.

Existing Conditions

The existing conditions summarized below are based on the Geotechnical Report unless otherwise referenced. The Geotechnical Report is included as Appendix F of this Draft EIR.

Regional Geology

The Project Site is located within the Los Angeles Basin and within the northern end of the Peninsular Ranges Geomorphic Province. The Peninsular Ranges are characterized by northwest-trending blocks of mountain ridges and sediment-floored valleys. The dominant geologic structural features are northwest trending fault zones that either die out to the northwest or terminate at east-west trending reverse faults that form the southern margin of the Traverse Ranges. The basin is bounded to the northwest by the Santa Monica Mountains.

[14] California Building Code, 2019 Part 2, Volume 1, Chapter 18, Soils and Foundations, Section 1803, Geotechnical Investigations.

Site Geology

The Project Site is characterized by relatively flat terrain. Fill materials extend from the ground surface to between 3 and 11.5 feet below ground surface (bgs), and consist of silty sand, sandy and clayey silt, sandy and silty clay. Native alluvium below the fill consists of interlayered mixtures of sand, silt, and clay, and extends to at least 90 feet bgs.

Groundwater

Historic high groundwater in the Project Site vicinity has been as high as about 20 feet bgs. Groundwater was observed in the four borings drilled as part of the geotechnical investigations. Additionally, groundwater was encountered in three other borings previously drilled at the Project Site at depths of 28.8 feet to 33 feet. Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors.

Faulting and Seismicity

The Project Site is located in a seismically active region of California. Throughout the Project region, there is the potential for damage resulting from movement along any one of a number of the active faults, seismic shaking, and seismically induced ground failures (e.g., liquefaction). Holocene-active faults are those that show evidence of surface displacement within the last 11,700 years. Pre-Holocene faults are those that have not shown movement in the past 11,700 years. In addition, there are blind thrust faults that do not break the surface but are still capable of generating damaging earthquakes. Surface fault rupture is the offset or rupturing of the ground surface by relative displacement across a fault during an earthquake.

Based on a literature review conducted as part of the Geotechnical Report, no known active or potentially active faults underlie the Project Site, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone, as shown on **Figure 4.5-1**, *Seismic Hazard Zones Map*. Therefore, the probability of damage from surface fault rupture on the Project Site is considered low. The nearest active fault to the Project Site is the Newport-Inglewood Fault Zone and the West Pico Fault Zone that splays off of the Newport-Inglewood Fault Zone, located approximately 0.21 miles to the east, as shown on Figure 4.5-1 and listed on **Table 4.5-1,** *Active Faults*. The Geotechnical Report estimated the Newport-Inglewood Fault Zone is capable of a maximum earthquake of magnitude 7.5 and a peak ground acceleration (PGA)[15] of 0.95 g, which would result in violent seismic shaking. Other active faults that are further away from the project site are included on Table 4.5-1. As previously noted, the Project Site is located within a seismically active region of California. Consequently, the Project Site may be subjected to seismic shaking or seismic-induced hazards, such as liquefaction, discussed further below.

[15] The Peak Ground Acceleration (PGA) for a given component of motion is the largest value of horizontal acceleration obtained from a seismograph. PGA is expressed as the percentage of the acceleration due to gravity (g), which is approximately 980 centimeters per second squared. In terms of automobile acceleration, one "g" of acceleration is equivalent to the motion of a car traveling 328 feet from rest in 4.5 seconds.

TABLE 4.5-1
ACTIVE FAULTS

Fault or Fault Zone	Approximate Distance[a]	Historical Seismicity[b]	Maximum Credible Earthquake (MCE)[c]
Newport-Inglewood (includes West Pico Fault Zone)	0.21 miles east	M6.3 in 1933 (Richter magnitude); many <M6	7.5
Santa Monica	2.66 miles north	At least 6 ruptures in past 50,000 years with most recent 1,000 to 3,000 years ago	7.4
Hollywood	3.96 miles northeast	Holocene but before historical times	6.7
Malibu Coast	7.99 miles northwest	M5.2 in 1979, M5.0 in 1989	7.0
Palos Verde	10.31 miles southwest	Holocene but before historical times	7.7
Raymond	11.3 miles northeast	M6 in 1981, Uncertain magnitude in 1855	6.8
Verdugo	12.42 miles northeast	Holocene but before historical times	6.9
Sierra Madre	16.75 miles northeast	M6.4 in 1971	7.3
Whittier-Elsinore	19.54 southeast	M5.9 in 1987	7.8
Santa Susana	20.59 miles north	M6.5 in 1971	6.9
San Gabriel	20.79 miles northeast	1,500 to 3,500 years ago	Not estimated
San Andreas	39.19 miles northeast	1857, 1906, 1989	8.25

NOTES:

[a] Distance from Project site.

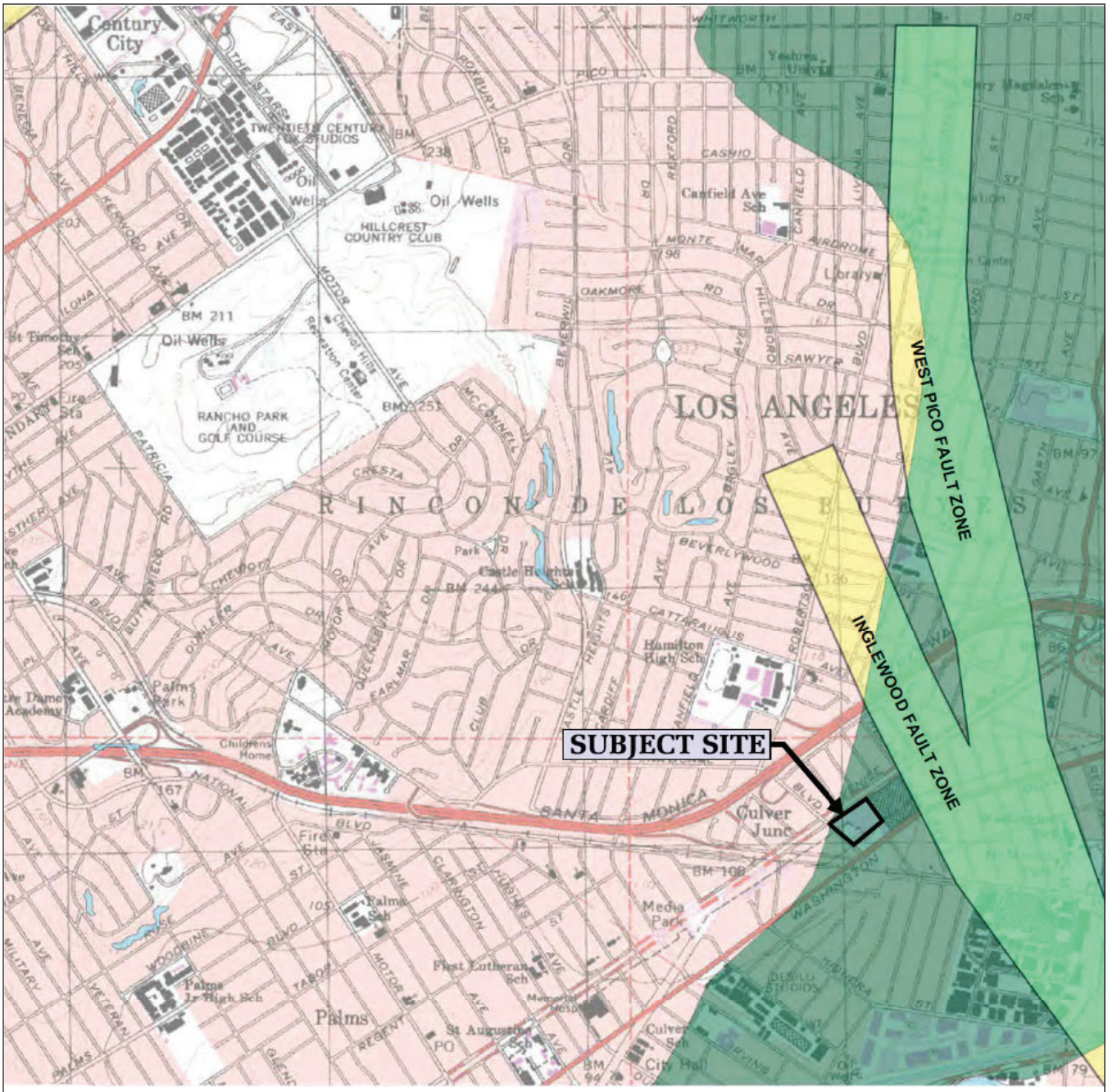
[b] M denoted magnitude and does not differentiate between the older Richter and more recent moment magnitude measurement scales.

[c] The maximum credible earthquake (MCE) is an estimated moment magnitude (M) for the largest earthquake capable of occurring on a fault.

SOURCE: Geotechnologies, Inc., 2022.

Liquefaction, Lateral Spreading, and Dynamic Settlement

Liquefaction is a phenomenon in which soil loses its shear strength for short periods of time during an earthquake. Ground shaking of sufficient duration results in the loss of grain-to-grain contact due to a rapid increase in pore water pressure, causing the soil to behave as a fluid for short periods of time. The effects of liquefaction may include excessive total and/or differential settlement of structures founded on the liquefying soils. To be susceptible to liquefaction, a soil is typically cohesionless, with a grain-size distribution of a specified range (generally sand and silt), loose to medium dense, below the groundwater table, and subjected to a sufficient magnitude and duration of ground shaking. The phenomenon of soil liquefaction may result in several hazards including liquefaction-induced settlement. The amount of dynamic settlement during a strong seismic event depends on the thickness of the liquefiable layers and the density and/or consistency of the soils.



D2021004l0.00 - Culver Crossings\05 Graphics-GIS-Modeling

SOURCE: Geotechnologies, Inc., 2021

Crossings Campus

Figure 4.5-1
Seismic Hazard Zones Map

ESA

According to Seismic Hazards Zones Maps published by the State of California, the Project Site is located within an area considered susceptible to liquefaction as indicated in Figure 4.5-1. To further research the potential for on-site liquefaction, the geotechnical investigation included laboratory testing of four on-site soil samples and based on Culver City and Los Angeles Building Code requirements, which incorporate by reference the requirements of the CBC. The analysis concluded that the potential for liquefaction of soils on the Project Site is considered to be low.

Lateral spreading of the ground surface during a seismic event usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to a lesser extent on ground surfaces with very gentle slopes. Despite the potential for liquefaction on the Project Site, due to the absence of any channel, slope, or river on or adjacent to the Project Site, the potential for lateral spreading on the Project Site is considered to be low.

Seismic-induced dynamic settlement or compaction of dry or moist cohesion-less soil can be triggered by a seismic event. Such settlements are typically most damaging when the settlements are differential across the site. However, because the bottoms of the structures, particularly the underground parking garages would extend to below the depth to groundwater, all of the overlying dry material would be removed. Therefore, the structures would not be susceptible to dynamic settlement.

Landslides

Landslides generally occur where slopes are steep and/or the earth materials are too week to support themselves. Earthquake-inducted landslides may also occur due to seismic ground shaking. As indicated previously, the Project Site is characterized by relatively level terrain. As there are no significant slopes on or within the vicinity of the Project Site, the Project is not susceptible to landslides.

Subsidence

Subsidence is characterized as a sinking of ground surface relative to surrounding areas, and can generally occur where deep soil deposits are present. Subsidence in areas of deep soil deposits is typically associated with regional groundwater withdrawal or other fluid withdrawal from the ground such as oil and natural gas. Subsidence can result in the development of ground cracks and damage to subsurface vaults, pipelines, and other improvements. The geotechnical investigation stated that the Project Site is not located within a zone of known subsidence. The USGS website on areas of land subsidence in California indicates that Culver City and the City of Los Angeles are not located in areas with historic land subsidence.[16]

Expansive Soils

Fill materials and unconsolidated alluvial deposits were encountered in exploratory borings to a depth of at least 90 feet bgs. Expansive soils include clay minerals that are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Sandy soils are generally not expansive. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, surface drainage, perched groundwater, drought, or other factors.

[16] USGS, 2022, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed on July 12, 2022.

Volumetric change of expansive soil may cause excessive cracking and heaving of structures with shallow foundations, concrete slabs-on-grade, or pavements supported on these materials. The Geotechnical Report concluded that the susceptibility of on-site soils to expansion ranges from very low to high.

Erosion

Erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur at the Project Site where soil or rock is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. The Project Site is currently entirely developed with hardscape and is relatively flat. There are no surface exposures of bare ground at the Project Site, other than in landscaped areas where soils are present. Therefore, the erosion potential of the Project Site is relatively low.

Methane

The Project Site is not located within a designated methane zone.[17, 18] Therefore, no constraints associated with methane or other subsurface gases are expected encountered at the Project Site.

Paleontological Resources

Geologic Map and Literature Review

Geologic mapping indicates that the surface of the Project Site is underlain by Holocene-aged younger Quaternary alluvium (mapped as Qa). The alluvial sediments were deposited on the ancient floodplain of the Los Angeles River and consist of well-sorted silts and sands, interbedded with stream channel deposits of sands and gravels.[19] At the surface, these sediments have low sensitivity due to the young age of the deposits and are unlikely to preserve fossil resources. However, these sediments increase in age with depth, such that the deeper layers of this unit are of an age and have the potential to preserve fossil resources (i.e., over 5,000 years old, as per the SVP).[20]

In 2016, paleontological resources monitoring was conducted for a project, located approximately 100 feet south of the Project Site. In total, 78 fossil specimens were collected from sediments at 28 to 29 feet below street level, both *in situ* and from spoil piles excavated at that level.[21] The taxa

17 Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Los Angeles, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

18 ZIMAS, website check for Culver City methane zones, http://zimas.lacity.org/. Accessed July 12, 2022.

19 Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

20 SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

21 SWCA Environmental Consultants, Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California. Prepared for: Greystar, 2615 Pacific Coast Highway, Suite 208, Hermosa Beach, CA 90254. Prepared by: SWCA Environmental consultants, 150 South Arroyo Parkway, Second Floor, Pasadena, CA 91105, 2016.

represented by the collected fossils range from mammal (*Camelops hesternus*) and plant (*Pinus* sp.) remains, to a large number of mollusks (Bivalvia and Gastropoda).

From 2017 to 2018, paleontological resources monitoring was conducted for a project located approximately 50 feet south of the Project Site. The monitoring yielded several paleontological specimens (gastropod and clam shells) at depths of 25 to 41 feet that extended past the artificial fill, throughout the entire property.[22]

In 2018, paleontological resources monitoring was conducted for another development project (located immediately south and adjacent to the Project Site). Approximately 100 specimens consisting of marine mammal (otariid, and cetacean), terrestrial mammals (*Bison* sp), invertebrate, and plant fossils, were encountered beginning at approximately 15 feet to 32 feet bgs, exclusively within bluish gray silty sand and clay layers.[23] Thus, they all come from marine facies of the Lakewood Formation. These fossiliferous sediments continue beyond the maximum depth of excavations at 35 feet bgs. The specimens were found in 13 separate locations across the property. Microvertebrate fossils were also identified through screening of sediments during construction, and included amphibians, snakes, gophers, kangaroo rats, harvest mice, wood rats, voles, and rabbits (Stewart, personal communication, 2022).

Natural History Museum of Los Angeles County Records Search

In addition to the literature search (which yielded a large array of fossil specimens in close proximity to the Project Site), ESA requested a database search on October 18, 2021, from the Natural History Museum of Los Angeles County (NHMLAC) for records of fossil localities in and around the Project Site. The purpose of the museum records search was to: (1) determine whether any previously recorded fossil localities occur in the Project Site, (2) assess the potential for disturbance of these localities during construction, and (3) evaluate the paleontological sensitivity within the Project Site and vicinity. The results from the NHMLAC were received on October 27, 2021. The results indicate that no fossil localities fall within the Project Site, but that fossil localities exist nearby from the same sedimentary deposits that occur in the Project Site, either at surface or at depth, as further summarized in **Table 4.5-2**, *Summary of NHMLAC Fossil Localities*. Fossil localities (including horse, camel, mammoth, man, pond turtle, ground sloth, mastodon, turkey, sabre-toothed cat, deer, sharks, bony fish, and rays) are situated within approximately 0.6 and 2 miles from the Project Site. These localities were found at unknown depths and depths between 6 and 13 feet bgs.

TABLE 4.5-2
SUMMARY OF NHMLAC FOSSIL LOCALITIES

Locality Number	Formation	Taxa	Depth
LACM VP 4250	Undetermined (Pleistocene)	Elephant (*Elephas*)	Unknown

[22] ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angele, CA 90017, 2018.

[23] ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

Locality Number	Formation	Taxa	Depth
LACM VP 3368	Undetermined (Pleistocene)	Horse (*Equus*)	Unknown
LACM IP 198	Unknown formation (Pliocene)	Invertebrates (unspecified)	Unknown
LACM VP 4232, LACM IP 23223	Undetermined (Pleistocene, interbedded sands & clayey silts)	Human (*Homo*), mammoth (*Mammuthus*); moon snails (*Cryptonatica*), turrid snails (*Propebela, Antiplanes*), scaphopod (*Dentalium*), murex snails (*Boreotrophon*), nut clam (*Acila*), dove snail (*Mitrella*)	12–13 feet bgs
LACM VP 3366	Unknown formation (Pleistocene)	Camel (Camelops)	Unknown (collected during the Limpo Outfall)
LACM VP 3369	Unknown formation (Pleistocene, greenish clay-silt)	Horse family (Equidae)	6 feet bgs

SOURCE: Natural History Museum of Los Angeles County, 2021.

Paleontological Sensitivity Analysis

The literature and geologic mapping review and the records search results presented above were used to assign paleontological sensitivity to the geologic units at surface and underlying the Project Site, following the guidelines of the SVP:[24]

Fill Material: As indicated by geotechnical testing,[25] fill material is present at the surface of the Project Site and extends to depths between 3 and 11-½ feet. It is unclear as to where the fill material came from and so assigning an age is not possible. Given that the fill is described as artificial and is likely the result of past grading or construction activities at the Project Site, it is unlikely to contain intact fossiliferous deposits. Therefore, this unit is assigned **No Potential** to contain significant paleontological resources.

Qa: Holocene alluvial gravel, sand and silt-clay, derived from Santa Monica Mountains; includes gravel and sand of stream channels. This geologic unit is mapped as covering the Project vicinity for several blocks in all directions and is concluded to be of Holocene age.[26] The geotechnical report for this Project[27] identified the sediments below the artificial fill only as "native soils." The upper layers of this unit is assigned **Low Potential** to contain paleontological resources given their young age. However, these sediments increase in age with depth, such that the deeper layers of this unit have a

24 SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

25 Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

26 Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

27 Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Los Angeles, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

Higher Potential to preserve paleontological resources. Therefore, this unit is assigned a **Low to High Potential** for significant paleontological resources such that the potential increases with depth.

Lakewood Formation: This formation consists of Pleistocene alluvium deposited in both marine and non-marine settings, and is only found subsurface in the Project vicinity. Within the Project vicinity, only marine facies of the Lakewood Formation have been identified. Given the fairly extensive vertebrate and invertebrate paleontological collections that resulted from nearby projects, the Lakewood Formation is assigned **High Potential** for significant paleontological resources.

4.5.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to geology and soils if it would:

- **GEO-1a:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 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.
- **GEO-1b:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: strong seismic ground shaking.
- **GEO-1c:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: seismic-related ground failure, including liquefaction.
- **GEO-1d:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: landslides.
- **GEO-2:** Result in substantial soil erosion or the loss of topsoil.
- **GEO-3:** Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- **GEO-4:** Be located on expansive soils[28] creating substantial direct or indirect risks to life or property.
- **GEO-5:** Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available or the disposal of wastewater.
- **GEO-6:** Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature.

Methodology

Geology and Soils

The technical analyses supporting the impact conclusions in the following subsections are based on the Geotechnical Report included in Appendix F of this Draft EIR. The Geotechnical Report presents

[28] The CBC, based on the International Building Code and the now defunct Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.

preliminary geotechnical information regarding the geologic and soils conditions at the Project Site, conclusions regarding the potential geologic and soils impacts of the Project, and recommendations to mitigate potential geologic and soils hazards. The Geotechnical Report was prepared in accordance with current engineering practice and the standard of care exercised by reputable geotechnical consultants performing similar tasks in Culver City and the City of Los Angeles.

Data and conclusions from the analyses in the geotechnical investigation were used to determine potential impacts from the Project to and from the site geology and soils parameters. These impacts were compared against the Thresholds of Significance set forth below to determine the level of significance of potential impacts.

Paleontological Resources

The analysis of paleontological resources in this section of the Draft EIR is summarized from the Paleontological Resources Assessment Report prepared by a qualified ESA paleontologist.[29] The analysis included a geologic map and literature review, review of the geotechnical engineering investigation prepared for the Project, a paleontological resources records search through the NHMLAC, and a paleontological sensitivity analysis.

Paleontological sensitivity is the potential for a geologic unit to produce scientifically significant fossils that could yield information important to prehistory, or that embody the distinctive characteristics of a type of organism, environment, period of time, or geographic region. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit; for this reason, paleontological sensitivity depends on the known fossil data collected from the entire geologic unit, not just a specific survey. The SVP defines four categories of paleontological sensitivity or, per the SVP guidelines, potential, for the presence of paleontological resources – high, low, undetermined, and no potential, as further described in the Paleontological Resources Assessment Report. For geologic units with high potential, full-time monitoring is typically appropriate during any project-related ground disturbance because of the risk to paleontological resources. For geologic units with low potential, protection or salvage efforts are not generally required because of the low risk of encountering paleontological resources. For geologic units with undetermined potential, accepted professional practice typically includes field surveys conducted by a qualified vertebrate paleontologist to determine the paleontological potential of the rock units present in the study area, which in turn prescribes how mitigation measures should be assigned. For geologic units with no potential to produce scientifically significant fossils, no protection or salvage efforts are normally required.

Project Design Features

No specific project design features are proposed with regard to geology, soils, seismicity, or paleontological resources.

[29] ESA, Crossings Campus, City of Culver City and City of Los Angeles, California, Paleontological Resources Assessment Report, July 2022. Provided as Appendix G of this Draft EIR.

Analysis of Project Impacts

Threshold GEO-1a: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 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.

Impact Analysis

The Project is a proposed office project with subterranean parking levels that would not require deep boring into the Earth's crust, fracking or other heavy industrial or mining use that could exacerbate existing environmental conditions that could cause in whole or in part impacts related to rupture of a known earthquake fault. No known active or potentially active faults bisect the Project Site, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone. The closest known active fault to the Project Site is the Newport-Inglewood Fault located approximately 0.21 miles to the east. Therefore, the Project Site is not subject to fault rupture. No impact would occur with respect to fault rupture.

Mitigation Measures

Impacts regarding fault rupture were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding fault rupture were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-1b: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: strong seismic ground shaking.

Impact Analysis

The Project would not exacerbate existing environmental conditions related to seismic ground shaking at the Project Site because the Project would not involve mining operations, excavation of large areas, or the extraction or injection of oil or groundwater, that could create unstable seismic conditions that would exacerbate ground shaking.

The Project Site is located in the seismically active southern California region and is subject to potentially strong seismic ground shaking. As indicated previously, the closest active fault to the Project Site is the Newport-Inglewood fault located approximately 0.21 mile to the east. The geotechnical investigation estimated the Project Site could be subjected to a magnitude 7.5 earthquake and a PGA of 0.95g, which would result in violent seismic ground shaking.

Project foundation and structural design and construction would be subject to the requirements of the seismic safety provisions of the CBC (Title 14, California Code of Regulations, Part 2), which have been formulated to prevent building collapse during a design earthquake so that building occupants can evacuate buildings after an earthquake.[30] Furthermore, Project foundation and structural design and construction would be subject to the site-specific geotechnical engineering recommendations of the detailed final geotechnical investigation required for the Project by CBC Section 1803, with these recommendations specifically formulated to avoid substantial adverse effects to people and structures associated with soil conditions, the MCE, and PGA at the Project Site. Therefore, through compliance with applicable regulations and the recommendations in the detailed final geotechnical investigation, impacts related to seismic ground shaking would be less than significant.

Mitigation Measures

Impacts regarding seismic shaking were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding seismic shaking were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-1c: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: seismic-related ground failure, including liquefaction.

Impact Analysis

As discussed in Section 4.5.2, *Environmental Setting,* under the *Liquefaction* subheading, although the Project Site is located within an area considered susceptible to liquefaction according to Seismic Hazards Zones Maps published by the State, geotechnical laboratory testing of on-site soils indicated a low potential for liquefaction. In addition, compliance with existing regulations would substantially reduce the potential liquefaction hazard at the Project Site. These regulations include, but are not necessarily limited to: CBC Section 1803, which requires a detailed final geotechnical investigation that evaluates and provides geotechnical engineering recommendations for liquefaction; CBC Section 1805.1.3, which requires that dewatering systems be adequately sized, and be designed and operated in accordance with specified engineering requirements; CBC Sections 1304 and J104.3, which identify specific slope limitations, compaction requirements, placement for fill requirements, and other grading requirements to provide the proper support of buildings; and CBC Section J104.5, which requires a liquefaction study and the implementation of the recommendations in the study for a grading permit. Compliance with these regulations would address the potential liquefaction hazard. Therefore, through compliance with applicable

[30] A "design earthquake" is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years.

regulations and the recommendations in the detailed final geotechnical investigation, impacts related to liquefaction would be less than significant.

Mitigation Measures

Impacts regarding liquefaction were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding liquefaction were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-1d: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: landslides.

As discussed in the Initial Study (Appendix A of this Draft EIR), the Project Site is relatively flat and is located outside the areas identified as susceptible to landslides. Therefore, the Project would have no impact with respect to Threshold GEO-1d and no further analysis is required.

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil.

Impact Analysis

As discussed in Section 4.5.2, *Environmental Setting*, under the *Site Geology* subheading, the Project Site is relatively flat, is entirely developed with no natural waterways, and is underlain by fill. The Project Site has no topsoil; therefore, the Project could not cause the loss of topsoil. The Project Site is larger than one acre. Consequently, the construction activities at the Project Site would be required to obtain coverage under and comply with the Construction General Permit, as discussed in Section 4.5.2, *Environmental Setting*, under the *NPDES Construction General Permit* subheading. The Project would be required to prepare and implement a SWPPP that would include various BMPs to control runon and runoff from the construction site. Therefore, through compliance with applicable regulations, impacts related to erosion would be less than significant.

Mitigation Measures

Impacts regarding erosion or loss of topsoil were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding erosion or loss of topsoil were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-3: The Project would result in a significant impact if it would be located on a geologic unit or soil that is unstable or that would become unstable, potentially resulting in an onsite or offsite lateral spreading, subsidence, liquefaction, or collapse.

Impact Analysis

Liquefaction and Lateral Spreading

Impacts related to liquefaction are discussed above under Impact GEO-1c. As indicated therein, impacts would be less than significant.

As indicated previously, lateral spreading of the ground surface during a seismic event usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to a less extent on ground surface with a very gentle slope. Despite the potential for liquefaction on the Project Site, due to the absence of any channel, slope, or river within or near the Project Site, the potential for on-site lateral spreading is currently negligible. The geotechnical investigation also concluded that the site soils would be capable of supporting proposed structures with the recommended foundation design measures.

The Project would include excavations of up to 50 feet bgs for underground parking garages and could potentially include some slopes and/or retaining walls during construction. Given the presence of liquefiable soil levels at the Project Site, these excavations and features could potentially lead to lateral spreading.

Compliance with CBC Sections 1803 (Detailed Geotechnical Investigations), 1304 (Excavations, Grading and Fill), and J104.3 (Grading Permit Requirements – Geotechnical/Soils Report) would substantially reduce the potential for lateral spreading by requiring construction, grading compaction, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions, including lateral spreading. Therefore, the potential for impacts associated with liquefaction-induced lateral spreading is considered less than significant.

Subsidence

As discussed in Section 4.5.2, *Environmental Setting,* under the *Subsidence* subheading, the potential for subsidence at the Project Site is considered low. In addition, the CBC, which Culver City and the City of Los Angeles have adopted by reference, outlines foundation, footing and other design requirements to withstand the effects of normal levels of subsidence, and requires that detailed geotechnical studies be prepared for proposed development projects prior to building permit approval that outline design requirements specific to the proposed development site. Therefore, potential subsidence impacts would be less than significant.

Collapse

As previously discussed, soil collapse is a phenomenon where unconsolidated soils undergo a significant decrease in volume upon an increase in moisture content. Soil collapse can cause excessive settlement-related distress to buildings and other improvements. The Project Site is

underlain by unconsolidated fill and alluvial material with relatively high observed groundwater levels (approximately 28.5 to 33 feet bgs) and historic groundwater levels as shallow as 20 feet bgs. Therefore, while the soils underlying the Project Site have been compacted by previous grading activities and the presence of on-site buildings, they could become collapsible if disturbed without proper regrading and compaction. In addition, the excavation for the underground parking garages will extend to below groundwater levels. Collapse of the excavation could occur without proper dewatering procedures.

Project grading activities would occur in accordance with the requirements of the CBC, including with: (1) CBC Section 1304, which identifies general compaction, placement of fill, and other grading requirements; and (2) CBC Section J104.3, which requires the preparation of a detailed final geotechnical report as a condition for obtaining a grading permit and analysis of on-site soils and identification of site-specific soil design criteria for structures. Compliance with these requirements would ensure the proper regrading and compaction is conducted, and would avoid the potential for collapse.

During excavation activities, temporary dewatering would be necessary to keep the excavations open for the construction of the underground parking garages. As stated in the Geotechnical Report, the excavation would require shoring and temporary dewatering to achieve a dry and stable excavation. Once the desired subgrade elevation is reached, it is anticipated that the subgrade would be saturated and may require a gravel blanket to stabilize the floor of the excavation. As discussed in Section 4.5.2, *Environmental Setting*, under the *Regulatory Framework* subheading, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the LARWQCB *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, pursuant to adopted Order No. R4-2013-0095, or any other appropriate WDR permits identified by the LARWQCB. Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards.

The deeper underground portions of the underground parking garages would be permanently below groundwater levels. As stated in the geotechnical investigation, the underground parking garages would need to be constructed to enable the structures to resist upward hydrostatic pressure by the use of uplift anchors attached to the mat foundation. Note that the required detailed final geotechnical investigation would be required to provide further detailed design of the hydrostatic uplift resistance measures in compliance with CBC Section 1805.1.3.

Through compliance with the CBC, impacts relative to collapse would be less than significant.

Mitigation Measures

Impacts regarding unstable geologic units and soils were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding unstable geologic units and soils were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-4: Be located on expansive soils creating substantial direct or indirect risks to life or property.

Impact Analysis

Expansive Soils

Expansive soils shrink and swell in response to moisture due to high percentages of clay. As discussed in Section 4.5.2, *Environmental Setting,* under the *Soils* subheading, the geotechnical investigations indicate that the potential for expansive soils at the Project Site ranges from very low to high, depending on the clay content. The preliminary geotechnical investigations provided recommendations for soil preparation, mat foundations, and slabs on grade to address expansive soils. Note that because the excavation would extend to 50 feet bgs and the observed depth to groundwater ranged from 28.5 to 33 feet bgs, all of the vadose zone soil (i.e., unsaturated soils) would be removed, thus removing all materials that would be susceptible to sequences of wetting and drying that lead to expansion of soil.

In addition, the geotechnical investigation concluded that the Project Site soils would be capable of supporting the proposed structures with recommended foundation design measures. Compliance with CBC Sections 1803 (Detailed Geotechnical Investigations), 1304 (Excavations, Grading and Fill), and J104.3 (Grading Permit Requirements – Geotechnical/Soils Report) would substantially reduce the potential for expansive soils by requiring construction, over-excavation and compaction of problematic soils, moisture management, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions including expansive soils. Through compliance with CBC regulations and implementation of geotechnical recommendations, impacts related to expansive soils would be less than significant.

Mitigation Measures

Impacts regarding expansive soils were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding expansive soils were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available or the disposal of wastewater.

As discussed in the Initial Study (Appendix A of this Draft EIR), the Project would be served by the municipal wastewater system and would not require septic tanks or alternative wastewater systems. Therefore, the Project would have no impact with respect to Threshold GEO-5 and no further analysis is required.

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature.

Impact Analysis

As discussed in Section 4.5.2, *Environmental Setting,* under the *Paleontological Resources* subheading, Geologic mapping indicates that the surface of the Project Site is underlain by Holocene-age alluvium (Qa), which have a low sensitivity for paleontological resources due to the young age of the deposits and are unlikely to preserve fossil resources. However, these sediments increase in age with depth, such that the deeper layers of this unit have a higher potential to preserve paleontological resources. Moreover, numerous paleontological resources have been recovered from deeper deposits during construction of three development projects in the immediate vicinity of the Project Site in association with the Lakewood Formation—a geological unit which consists of a Pleistocene-age alluvium deposited in both marine and non-marine settings, which is considered to have high potential for encountering paleontological resources. In particular, these projects yielded the identification of more than 200 fossil specimens from these deposits that were encountered at depths between 15 feet bgs to 41 feet bgs. In addition, the paleontological records search conducted through the NHMLAC also indicates that older (Pleistocene-age) geologic units in the vicinity of the Project Site have produced paleontological resources (including fossil specimens of horse, camel, mammoth, pond turtle, ground sloth, mastodon, mammoth, camel, turkey, saber-toothed cat, horse, deer, sharks, bony fish, and rays), including resources located within approximately 0.6 and 2 miles from the Project Site at depths between 6 and 13 feet bgs and unknown depths. Given the identification of numerous fossil specimens at depth during construction projects in the immediate vicinity, the positive results of NHMLAC records search, and since excavations for the Project would extend to depths of about 50 feet bgs, the potential to encounter buried paleontological resources during construction of the Project is considered high. Therefore, as the Project could directly or indirectly destroy unique paleontological resources, impacts on buried paleontological resources are considered potentially significant.

Mitigation Measures

The implementation of Mitigation Measures GEO-MM-1, GEO-MM-2, and GEO-MM-3 presented below address the potential for impacts in the event buried paleontological resources are encountered during excavation for the Project.

> **GEO-MM-1:** Prior to the issuance of grading permits, the Applicant shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (Qualified

Paleontologist). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and Project progress meetings, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

GEO-MM-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per SVP Guidelines (2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on-site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.

GEO-MM-3: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.

Level of Significance after Mitigation

Implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 would require retention of a Qualified Paleontologist meeting the SVP Standards in order to provide technical and compliance oversight, construction worker paleontological resources sensitivity training, and paleontological resources monitoring. Impacts related to paleontological resources during Project construction would be reduced to less than significant with implementation of the above mitigation measures. The Project would have no impacts to paleontological resources during operation as there would be no continuous groundbreaking and excavation activities during Project operation.

Cumulative Impacts

Impact Analysis

This section presents an analysis of the cumulative effects of the Project in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Significant cumulative impacts related to geology, soils, seismicity, and paleontological resources could occur if the incremental impacts of the Project combined with the incremental impacts of one or more of the 52 related projects identified on Table 3-1 and shown on Figure 3-1 in Chapter 3, *Environmental Setting*, of this Draft EIR.

- The geographic area affected by the Project and its potential to contribute to cumulative impacts varies based on the environmental resource under consideration. The geographic scope of analysis for cumulative geologic impacts encompasses and is limited to the Project Site and its immediately adjacent area. This is because impacts relative to geologic hazards are generally site-specific. For example, the effect of erosion would tend to be limited to the localized area of a project and could only be cumulative if erosion spatially overlapped two or more adjacent projects.

The timeframe during which Project could contribute to cumulative geologic hazards includes the construction and operations phases. For the Project, the operations phase is permanent. However, similar to the geographic limitations discussed above, it should be noted that impacts relative to geologic hazards are generally time-specific. Geologic hazards could only be cumulative if two or more geologic hazards occurred at the same time, while also overlapping at the same location.

Geology and Soils

As with the Project, related projects would be built in the same seismically active region and could experience ground shaking and other seismic-induced hazards. Related projects would also be required to comply with the same applicable construction standards, seismic standards, safety requirements and, standard design specifications to resist and reduce potential damage from seismic and other geologic hazards to an acceptable level. Geologic and soil impacts are generally site-specific and there is little, if any, cumulative relationship between development projects. Adherence to all relevant plans, codes, and regulations with respect to project design and construction, together with implementation of project design features, would reduce geologic and seismic impacts to less than significant levels for both the project and related projects. Therefore, the impacts for the project and related projects would not contribute considerably to cumulative geologic and seismicity impacts, nor would the related projects be likely to result in significant geologic and seismic impacts. As such, cumulative geologic and seismic impacts would be less than significant.

During construction of the Project and related projects, grading and excavation have the potential to expose soils in the area to wind and water erosion, resulting in erosion or a loss of topsoil. As discussed above under Impact GEO-4, any project involving grading of an area greater than one acre is required to apply for coverage under the NPDES Construction General Permit, which requires the preparation and implementation of a SWPPP with BMPs for erosion control. Compliance with the Construction General Permit requirements, and with the grading requirements of the applicable city (i.e., Culver City or City of Los Angeles) would minimize potential soil erosion impacts for the Project and related projects, with the erosion impacts of the Project less

than significant as indicated above under Impact GEO-4. Therefore, the Project would not contribute considerably to cumulative erosion impacts, nor would the related projects be likely to result in significant erosion impacts. As such, cumulative erosion impacts would be less than significant.

Paleontological Resources

As discussed in Impact GEO-6, the region is known to have paleontological resources, and like the Project, other related projects in the vicinity that involve excavation into native soils have the potential to encounter paleontological resources due to prior discoveries in the area and the generally high sensitivity of underlying soils. Accordingly, cumulative impacts prior to mitigation would be significant. Similar to the Project, related projects would be required to implement monitoring and preservation measures or conditions of approval.

Mitigation Measures

Geology and Soils

Cumulative impacts regarding geology and soils were determined to be less than significant without mitigation for the Project. Therefore, no mitigation measures related to geology and soils are required.

Paleontological Resources

The Project would be required to implement Mitigation Measures GEO-MM-1 through GEO-MM-3 (see Impact GEO-6), and related projects that involve excavation into native soils are expected to implement similar mitigation measures or conditions of approval.

Level of Significance after Mitigation

Geology and Soils

Cumulative impacts to geology and soils would to be less than significant. Therefore, no additional mitigation measures beyond those identified for the reduction of impacts related to paleontological resources are required.

Paleontological Resources

Cumulative impacts related to paleontological resources under the Project would be potentially significant prior to implementation of mitigation measures. With implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3, Project impacts would be reduced to a less than significant level, and implementation of similar mitigation measures or conditions of approval by related projects would similarly reduce impacts to a less than significant level. As paleontological resources, if encountered during excavation, would be protected and recovered and would contribute to the body of scientific knowledge of paleontological resources, the Project's contribution to cumulative impacts would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

4.6 Greenhouse Gas Emissions

4.6.1 Introduction

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, the Southern California Association of Governments (SCAG), the City of Culver City and the City of Los Angeles to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. Details regarding the GHG analysis are provided in Appendix B of this Draft EIR.

4.6.2 Environmental Setting

GHG Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences. [1]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect. [2]

[1] United States Environmental Protection Agency (USEPA), Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/greenhouse-gases. Accessed July 12, 2022.

[2] Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the U.S. Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2020 report, published in December 2020, atmospheric carbon dioxide (CO_2) concentrations in 2020 were found to be 48 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[3] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHGs, these have also increased significantly since 1990.[4] In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[5]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[6]

In December 2015, the US entered into the Paris Agreement which has a goal of keeping a global temperature rise this century below 2 degrees Celsius above pre-industrial levels and limit the temperature increase further to 1.5 degrees Celsius. This agreement requires that all parties report regularly on emissions and implementation efforts to achieve these goals.

Regarding the adverse effects of global warming, as reported by SCAG:

> *Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the*

[3] P. Friedlingstein et al.: Global Carbon Budget *2020*, 2020.

[4] USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed July 12, 2022.

[5] USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.

[6] United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

state's population and economic activities, is also a major contributor to the global warming problem.[7]

GHG Fundamentals

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[8] More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy, which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in **Table 4.6-1**, *Description of Identified GHGs*, below.[9,10]

TABLE 4.6-1
DESCRIPTION OF IDENTIFIED GHGS

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.

7 Southern California Associated of Governments (SCAG), The State of the Region—Measuring Regional Progress, December 2006, p. 121.

8 As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

9 Intergovernmental Panel on Climate Change (IPCC), Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

10 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

GHG	General Description
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

NOTE: GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

SOURCES: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; U.S. Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Not all GHGs possess the same ability to induce climate change. CO_2 is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of CO_2 (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2.

The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time.[11] These GWP ratios are available from IPCC. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values in its Fourth Assessment Report (AR4). The GWPs in the IPCC AR4 are used by California Air Resources Board (CARB) for reporting statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has reduced down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software California Emissions Estimator Model (CalEEMod) is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in **Table 4.6-2**, *Atmospheric Lifetimes and GWPs*.

[11] GWPs and associated CO2e values were developed by IPCC, and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.

TABLE 4.6-2
ATMOSPHERIC LIFETIMES AND GWPS

Gas	Atmospheric Lifetime (Years)	GWP (100-Year Time Horizon) (AR4 Assessment)	GWP (100-Year Time Horizon) (AR5 Assessment)
Carbon Dioxide (CO_2)	50-200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

SOURCE: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials.

Projected Impacts of Global Warming in California

In 2009, California adopted a statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The California Natural Resources Agency (CNRA) updated the CAS in 2018 in a strategy called *Safeguarding California* and again in 2021. The 2021 CAS's goal is to drive collective action moving forward through six main priorities: Strengthen Protections for Climate Vulnerable Communities, Bolster Public Health and Safety to Protect Against Increasing Climate Risks, Building a Climate Resilient Economy, Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems, Make Decisions Based on the Best Available Climate Science, Partner and Collaborate to Leverage Resources.[12]

The Natural Resources Agency has also produced climate change assessments which detail impacts of global warming in California.[13] These include:

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.

[12] California Natural Resources Agency, California Climate Adaptation Strategy, https://resources.ca.gov/Initiatives/Building-Climate-Resilience/2021-State-Adaptation-Strategy-Update. Accessed July 12, 2022.

[13] State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact. Accessed July 12, 2022.

- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures and saltwater contamination resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.[14]

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forces [*sic*] together."[15] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[16]

According to the CalEPA, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea

[14] Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

[15] IPCC, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, p. 5, http://ipcc.ch/report/ar5/syr/. Accessed July 12, 2022.

[16] Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[17] Data regarding potential future climate change impacts are available from CNRA, which in 2009 published the *California Climate Adaptation Strategy*[18] as a response to Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[19] The website, known as Cal-Adapt, became operational in 2011.[20] The information provided by the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values from a variety of scenarios and models, and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.[21]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual increase in maximum temperature to 74.4 to 75.2°F in the mid-century (2035–2064) and 75.4 to 78.3°F at the end of the century (2070–2099) compared to 71.4°F for the baseline period (1961–1990). The average annual number of extreme heat days also could increase to 5 to 6 days in the mid-century (2035–2064) and 6 to 15 days at the end of the century (2070–2099) compared to 2 days for the baseline period (1961–1990).[22]

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise

[17] California Environmental Protection Agency (CalEPA), Climate Action Team (CAT), Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

[18] California Natural Resources Agency (CNRA), CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

[19] CNRA, CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

[20] The Cal-Adapt website: http://cal-adapt.org. Accessed July 12, 2022.

[21] California Energy Commission (CEC), Scenarios of Climate Change in California: An Overview, February 2006.

[22] The Cal-Adapt website: http://cal-adapt.org. Accessed July 12, 2022.

and consistent information about how precipitation patterns, timing, and intensity will change."[23] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.[24] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.[25] Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[26]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual length of dry spells of 169 to 170 days in the mid-century (2035–2064) and 170 to 178 days at the end of the century (2070–2099), compared to 163 days for the baseline period (1961–1990). The average annual precipitation could decrease to 15.6 to 15.7 inches in the mid-century (2035–2064) and potentially stay the same or increase to 15.9 to 16.0 inches at the end of the century (2070–2099), compared to 15.9 inches for the baseline period (1961–1990).

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[27] In its AR5, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[28]

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal

[23] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[24] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[25] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[26] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[27] California Department of Water Resources, Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006.

[28] IPCC, Fifth Assessment Report, Summary for Policy Makers, p. 20.

erosion; and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. Absent planning and preparation, a rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply, and increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $30 billion agricultural industry that produces one half of the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; without planning and preparations. Crop yield could be threatened by a less reliable water supply. Also, greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality. [29]

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2 to 11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation. [30] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage. [31,32]

Regulatory Framework

There are a number of plans, regulations, programs, and agencies that provide policies, requirements, and guidelines regarding GHG emissions at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
- Corporate Average Fuel Economy Standards
- Energy Independence and Security Act
- California Air Resources Board
- California GHG Reduction Targets
- California Global Warming Solutions Act of 2006 (Assembly Bill 32)

[29] California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.
[30] National Research Council, Advancing the Science of Climate Change, 2010.
[31] Parmesan, C., Ecological and Evolutionary Response to Recent Climate Change, first published on August 24, 2006.
[32] Parmesan, C. and Galbraith, H., Observed Ecological Impacts of Climate Change in North America. Arlington, VA: Pew. Cent. Glob. Clim. Change, 2004.

- Climate Change Scoping Plan
- Cap-and-Trade Program
- Emission Performance Standards
- Renewables Portfolio Standard (RPS) Program
- Pavley Standards
- California Low-Carbon Fuel Standard
- Advanced Clean Cars Regulations
- Sustainable Communities and Climate Protection Act (Senate Bill 375)
- Senate Bill 743
- California Appliance Efficiency Regulations
- Title 24, Building Standards Code and California Green Building Standards Code
- California Environmental Quality Act Guidelines
- South Coast Air Quality Management District
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- Culver City General Plan
- Culver City Green Building Ordinance and Program
- Culver City Bicycle and Pedestrian Action Plan
- Culver City Clean Power Alliance
- Los Angeles General Plan
- Los Angeles Solid Waste Programs and Ordinances
- Los Angeles Green Building Code
- Los Angeles Green New Deal/Sustainable City pLAn
- Los Angeles Traffic Study Policies and Procedures

Federal

Federal Clean Air Act

USEPA is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the Federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation.

The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH_4 and other non-CO_2 gases, agricultural practices, and implementation of technologies

to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the U.S. Department of Transportation (USDOT), and the U.S. Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for, and GHG emissions from, cars and light-duty trucks for model year 2011 and later for model years 2012–2016 and 2017–2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[33] These standards set a combined fleet wide average of 36.9 to 37 for the model years affected.[34] On January 20, 2021, President Biden issued Executive Order 13990 ''Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis'' directing EPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule for Model Years 2021–2026. In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[35] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[36]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel

[33] USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

[34] National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

[35] USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

[36] USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[37]

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[38]

State

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the Federal CAA. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020.

[37] USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

[38] A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

California GHG Reduction Targets

Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. The CAT provides periodic reports to the Governor and Legislature on the state of GHG reductions in the State as well as strategies for mitigating and adapting to climate change.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons (MMT) of CO_2e.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

In October 2020, CARB released a study, which evaluated three scenarios that achieve carbon neutrality in California by 2045. The study will be used by CARB in development of the 2022 Scoping Plan update.[39] More ambitious carbon reduction scenarios that achieve carbon neutrality prior to 2045 may be considered as part of future analyses by the State.

The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO_2 removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80-percent reduction in GHGs by 2045, relative to 1990 levels. Remaining CO_2 would be reduced to zero by applying CO_2 removal strategies, including sinks from natural and working lands and negative emissions technologies, such as direct air capture.[40,41]

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

California Global Warming Solutions Act of 2006 (Assembly Bill 32)

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines regulated GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.[42]

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39 Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

40 Sinks are defined as natural or artificial reservoirs that accumulate and store a carbon-containing chemical compound for an indefinite period.

41 Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.

42 California Air Resources Board's (CARB's) list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are: (1) a low-carbon fuel standard, which reduces carbon intensity in fuels statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased CH_4 capture from landfills, which includes requiring the use of state-of-the-art capture technologies.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the Climate Change Scoping Plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill linked to SB 32 and prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

Climate Change Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561(h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[43] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

The 2008 Climate Change Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the LCFS, and greater consideration to reducing trip length and generation through land use planning and TOD. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.[44] Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increased energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through "improving energy efficiency by 25 percent."

[43] CARB, Climate Change Scoping Plan, December 2008.

[44] For a discussion of Renewables Portfolio Standard, refer to subsection *California Renewables Portfolio Standard*.

The 2008 Climate Change Scoping Plan identified several specific issues relevant to the development projects, including:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

  > *A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.*

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.
- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions reduction target for 2020. The 2020 emissions reduction target was originally set at 427 MMT of CO_2e using the GWP values from the IPCC SAR. Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California must make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" (BAU), scenario as emissions in the absence of any GHG emission reduction measures discussed in the 2008 Climate Change Scoping Plan, as approximately 596 $MMTCO_2e$ (using GWP values from the IPCC SAR). For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. Therefore, under these original projections, the State would have had to reduce its 2020 BAU emissions by 28.4 percent to meet the 1990 target of 427 $MMTCO_2e$.

2014 Climate Change Scoping Plan Update

The First Update to the Climate Change Scoping Plan (2014 Scoping Plan) was approved by CARB in May 2014 and built upon the initial Climate Change Scoping Plan with new strategies and recommendations.[45] In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined the 1990 GHG emissions inventory and 2020 GHG emissions limit to be increased to 431 $MMTCO_2e$. CARB also updated the State's 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that had recently been adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values

[45] CARB, First Update to the AB 32 Scoping Plan, May 2014.

from the IPCC AR4 was 509.4 $MMTCO_2e$. Therefore, under the First Update to the Climate Change Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 $MMTCO_2e$ would have been 78.4 $MMTCO_2e$, or a reduction of GHG emissions by approximately 15.4 percent, (down from 28.4 percent).

The stated purpose of the First Update was to "highlight… California's success to date in reducing its GHG emissions and lay… the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050."[46] The First Update found that California was on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the State realizes the expected benefits of existing policy goals.[47]

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the State's economy to evaluate and describe the larger transformative actions that will be needed to meet the State's more expansive emission reduction needs by 2050."[48] Those six areas are: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of the 2050 reduction target.

Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050."[49] Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero-net-energy buildings as an element of meeting mid-term and long-term GHG reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

2017 Climate Change Scoping Plan Update

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan) in December 2017. The 2017 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Scoping Plan includes policies to require direct GHG

46 CARB, 2014 Scoping Plan, May 2014, p. 4.
47 CARB, 2014 Scoping Plan, May 2014, p. 34.
48 CARB, 2014 Scoping Plan, May 2014, p. 6.
49 CARB, 2014 Scoping Plan, May 2014, p. 32.

reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.

CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs. The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions would be achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., HFCs), and implementing the mobile source strategy and sustainable freight action plan. Implementation of mobile source strategies (cleaner technology and fuels) include the following:

- At least 1.5 million zero-emissions and plug-in-hybrid light-duty electric vehicles by 2025
- At least 4.2 million zero-emissions and plug-in-hybrid light-duty electric vehicles by 2030
- Further increase GHG stringency on all light-duty vehicles beyond existing ACC regulations
- Medium- and heavy-duty GHG Phase 2
- Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero-emissions buses with the penetration of zero-emissions technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-oxides of nitrogen (NO_X) standard.
- Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emissions trucks primarily for Class 3–7 last mile delivery trucks in California. This measure assumes zero-emission vehicles (ZEVs) comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.
- Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."

The 2017 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.

For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the 2017 Scoping Plan, the State's long-term goals, and climate change science.

A summary of the GHG emissions reductions required under HSC Division 25.5 is provided in **Table 4.6-3**, *Estimated Statewide GHG Emissions Reductions Required by HSC Division 25.5.*

TABLE 4.6-3
ESTIMATED STATEWIDE GHG EMISSIONS REDUCTIONS REQUIRED BY HSC DIVISION 25.5

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2008 Scoping Plan (IPCC SAR)	
2020 BAU Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below BAU necessary to achieve 1990 levels by 2020	169 (28.4%) [a]
2014 Scoping Plan (GHG Estimates Updated in 2014 to Reflect IPCC AR4)	
2020 BAU Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below NAT necessary to achieve 1990 levels by 2020	78.4 (15.4%) [b]
2017 Scoping Plan	
2030 BAU Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by AB 32 (i.e., 40% below 1990 Level)	260
Reduction below BAU Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) [c]

NOTES: $MMTCO_2e$ = million metric tons of CO_2 equivalents.

[a] 596 – 427 = 169 / 596 = 28.4%

[b] 509.4 – 431 = 78.4 / 509.4 = 15.4%

[c] 389 – 260 = 129 / 389 = 33.2%

SOURCES: CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011. CARB, GHG 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017. Accessed July 12, 2022. https://ww2.arb.ca.gov/ghg-bau. CARB, California's 2017 Climate Change Scoping Plan Update, November 2017.

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 $MMTCO_2$ of the 2030 reduction obligation.[50] The State's short-lived climate pollutants strategy, which is for GHGs that remain in the atmosphere for shorter periods of time compared to longer-lived GHGs like CO_2, is expected to cover approximately 17 to 35 $MMTCO_2e$. The RPS with 50 percent renewable electricity by 2030 is expected to cover approximately 3 $MMTCO_2$. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of ZEVs and improving the freight system efficiency, and is expected to cover approximately 11 to 13 $MMTCO_2$. CARB expects that the reduction in GHGs from doubling of the energy efficiency savings in natural gas and electricity end uses in the CEC 2015 Integrated Energy Policy Report by 2030 would cover approximately 7 to 9 $MMTCO_2$ of the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

50 CARB, 2017 Scoping Plan, Appendix G, November 2017.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[51] pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The statewide cap for GHG emissions from the capped sectors[52] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program.[53] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule).[54]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[55] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the statewide emission limits will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[56] Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from

51 California Code of Regulations (CCR) 17, Section 95800 to 96023.
52 CCR 17, Section 95811, 95812.
53 CCR 17, Section 95812.
54 CCR 17, Section 95100-95158.
55 Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.
56 CCR 17, Section 95811(b).

combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[57]

The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

Energy-Related (Stationary) Sources

Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewables Portfolio Standard

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as an RPS. Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. The 2017 Scoping Plan incorporated the SB 350 standards and estimated the GHG reductions would account for approximately 21 percent of the 2017 Scoping Plan reductions.[58] On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.[59]

Mobile Sources

Pavley Standards

AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In 2004, CARB approved the Pavley regulation to require automakers to control GHG emissions from new

[57] CCR 17, Section 95811, 95812(d).

[58] CARB, 2017 Scoping Plan, Table 3, p. 31, November 2017. Calculated as: (108–53) / 260 = 21 percent.

[59] California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

passenger vehicles for the 2009 through 2016 model years. Upon adoption of subsequent federal GHG standards by USEPA that preserved the benefits of the Pavley regulations, the Pavley regulations were revised to accept compliance with the federal standards as compliance with California's standards in the 2012 through 2016 model years. This is referred to as the "deemed to comply" option.

In January 2012, CARB approved GHG emission regulations which require further reductions in passenger GHG emissions for 2017 and subsequent vehicle model years. As noted above, in August 2012, USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles. On November 15, 2012, CARB approved an amendment that allows manufacturers to comply with the 2017–2025 national standards to meet State law. Automobile manufacturers generally comply with these standards through a combination of improved energy efficiency in vehicle equipment (e.g., air conditioning systems) and engines as well as sleeker aerodynamics, use of strong but lightweight materials, and lower-rolling resistance tires.[60]

In 2018, the USEPA proposed the SAFE Vehicles Rule, which would roll back fuel economy standards and revoke California's waiver. The rule amended certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. On March 30, 2020, the SAFE Rule was finalized and published in the Federal Register, commencing a review period. Subsequent legal challenges from a coalition of states, including California, and private industry groups were issued. In August 2021, USEPA proposed to revise and strengthen the emissions standards for passenger cars and light trucks for model years 2023 through 2026.

On September 27, 2019, the USEPA withdrew the waiver it had previously provided to California for the State's GHG and ZEV programs under Section 209 of the CAA.[61] The withdrawal of the waiver was effective November 26, 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the USEPA waiver.[62] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[63] As of March 14, 2022, the USEPA published its Notice of Decision to continue California's waiver for its Advanced Clean Cars program, which allows the state to set and enforce more stringent standards than the federal government, including California's GHG standards and zero emission vehicle mandate, thereby ending the SAFE rule (87 Fed. Reg. 14,332).

California Low-Carbon Fuel Standard

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and (2) that a LCFS for transportation fuels be established in California. The final regulation was approved by the Office of Administrative Law and filed with

60 CARB, California's Advanced Clean Cars Midterm Review, pp. ES-17, C-9.

61 84 FR 51310.

62 United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

63 United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

the Secretary of State on January 12, 2010; the LCFS became effective on the same day. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted.[64]

The development of the 2017 Scoping Plan has identified LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20 percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[65]

Advanced Clean Car Regulations

In 2012, CARB approved the ACC program, an emissions-control program for model years 2015–2025.[66] The components of the ACC program include the low-emissions vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in-hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[67]

Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, which would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's ACC II Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package is anticipated to be presented to the Board in June 2022.

Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. SB 375 finds

64 CARB, Low-Carbon Fuel Standard – About, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about. Accessed July 12, 20222.

65 CARB, CARB amends Low-Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed July 12, 2022.

66 CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed July 12, 2022.

67 CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed July 12, 2022.

that the "transportation sector is the single largest contributor of GHGs of any sector."[68] Under SB 375, CARB is required, in consultation with the metropolitan planning organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the MPO in which the City of Culver City and City of Los Angeles are located. CARB set targets for 2020 and 2035 for each of the 18 MPO regions in 2010, and updated them in 2018.[69] In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an eight percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[70] As discussed further below, SCAG has adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[71]

Under SB 375, the target must be incorporated within that region's RTP, which is used for long-term transportation planning, in an SCS. Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS.

As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years with the last update formally adopted in March 2018. As part of the 2018 updates, CARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region which is reflected in the 2020–2045 RTP/SCS.[72]

Senate Bill 743

Former Governor Brown signed SB 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Building Standards and Other Regulations

California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for

68 State of California, SB No. 375, September 30, 2008.

69 CARB, Sustainable Communities & Climate Protection Program – About, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about. Accessed July 12,2022.

70 CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets.

71 Southern California Association of Governments (SCAG), Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, May 7, 2020, p. 5.

72 CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets (2018).

sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24, Building Standards Code and California Green Building Standards Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Building Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Building Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[73] The CALGreen Building Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Building Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[74]

On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which went into effect on January 1, 2020. The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.[75] The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the standards represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Single-family homes built with the 2019 Title 24 Standards are projected to use approximately seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy due mainly to lighting upgrades.[76] The Project will comply with the latest Title 24 Standards at the time of building permit issuance, which is likely to be the

73 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.
74 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.
75 CEC, 2019 Building Energy Efficiency Standards.
76 CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

2022 Title 24 Standards. The 2022 Title 24 Standards focuses on four key areas: encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality.[77]

California Environmental Quality Act Guidelines

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring the Governor's OPR to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted the CEQA Guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.[78] The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[79]

On December 28, 2018, OPR adopted amendments to the CEQA Guidelines to clarify several points such as cumulative nature of greenhouse gas emissions, modeling methodology, and significance evaluation. The administrative record for the CEQA Guidelines amendments also clarifies "that the effects of GHG emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[80]

Regional

South Coast Air Quality Management District The Project Site is located in the South Coast Air Quality Management District (SCAQMD) South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western,

[77] CEC, 2022 Building Energy Efficiency Standards Summary.

[78] See 14 California Code of Regulations Sections 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

[79] 14 California Code of Regulations Section 15064.4(b).

[80] Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research (OPR) to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[81] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[82] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy On September 3, 2020, the SCAG's Regional Council formally adopted the 2020–2045 RTP/SCS also known as the Connect SoCal, which is an update to the previous 2016–2040 RTP/SCS.[83] Using growth forecasts and economic trends, 2020–2045 RTP/SCS provides a vision for transportation throughout the region for the next several decades by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2020–2045 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction in per capita transportation GHG emissions by 2020 and a 19 percent reduction in per capita transportation emissions by 2035 compared to the 2005 level on a per capita basis.[84] Compliance with and implementation of the 2020–2045 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions (e.g. nitrogen dioxide, carbon monoxide) associated with reduced per capita vehicle miles traveled (VMT).

The 2020–2045 RTP/SCS states that the SCAG region was home to approximately 18.8 million people in 2016 and included approximately 6.0 million homes and 8.4 million jobs.[85] By 2045, the

[81] South Coast Air Quality Management District (SCAQMD), Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/0812ag.html. Accessed July 12, 2022.

[82] SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed July 12, 2022.

[83] SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), May 2020.

[84] SCAG, 2020-2045 RTP/SCS, May 2020.

[85] SCAG, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, May 2020.

integrated growth forecast estimates that these figures will increase by 3.7 million people, with approximately 1.6 million more homes and 1.7 million more jobs. High-quality transit areas (HQTAs), which are defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 2.4 percent of regional total land, but are projected to accommodate 51 percent and 60 percent of future household growth respectively between 2016 and 2045.[86] The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

SCAG's 2020–2045 RTP/SCS provide specific strategies for implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.[87]

In addition, the 2020–2045 RTP/SCS include strategies to promote active transportation, support local planning and projects that serve short trips, promote transportation investments, investments in active transportation, more walkable and bikeable communities, that will result in improved air quality and public health, and reduced GHG emissions, and supports building physical infrastructure, regional greenways and first-last mile connections to transit, including to light rail and bus stations. The 2020–2045 RTP/SCS align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determinations in the 2020–2045 RTP/SCS and demonstrates achievement of the GHG emission reduction targets established by CARB.[88,89]

Although there are GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020–2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an additional 4.1-percent reduction in GHG from transportation-related sources in the ten years between 2035 and 2045, the 2020–2045 RTP/SCS is expected to

[86] SCAG, 2020-2045 RTP/SCS, May 2020, p. 51.
[87] SCAG, 2020-2045 RTP/SCS, May 2020, pp. 48-86.
[88] SCAG, 2020-2045 RTP/SCS, May 2020, pp. 48-86.
[89] CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[90]

Local

City of Culver City

The City of Culver City has not adopted a GHG significance threshold; however, the City of Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community.

Culver City General Plan

The Circulation Element provides an overview of regulatory policies, transportation agencies, and local conditions; presents a vision for mobility in the Culver City area; presents a Street System Classification; discusses the Culver CityBus system; presents Bikeway Classifications; and provides goals, objectives, and policies to improve the local and regional transportation system. The City of Culver City has also adopted the concept of Complete Streets, which emphasizes a balanced transportation system that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects.[91] The goal of this concept is to transform the City of Culver City into a place with an extensive bicycle and pedestrian network that allows travelers of all levels and abilities to feel comfortable walking and biking to their destinations.[92]

Culver City Green Building Ordinance and Program

The City of Culver City has adopted green building ordinances to reduce GHG emissions for new development. The City of Culver City has adopted a Photovoltaic Requirement that requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet (sf) of new development (conservatively assumed to be incorporated as part of compliance with 2019 Title 24 Standards) or payment of an in-lieu fee.[93] The Applicant would also comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code.

In 2009, the City of Culver City adopted the Green Building Program that requires new developments totaling more than 50,000 sf to achieve Leadership in Energy and Environmental Design (LEED) equivalent certification.[94] An example of the City of Culver City's Green Building Program requirements is that all lighting has to be either fluorescent, LED or other type of high-efficiency lighting. As stated below in subsection *Project Design Features*, the Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy

90 SCAG, 2020-2045 RTP/SCS Public Health Technical Report, May 2020, p. 53.

91 City of Culver City, Culver City Bicycle & Pedestrian Master Plan (BPMP), adopted by City Council, November 8, 2010, p. 8.

92 City of Culver City, BPMP, p. 136.

93 City of Culver City, Municipal Code Chapter 15.02.1005, Solar Photovoltaic Systems.

94 City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of Culver City's Green Building Program Requirements.

Culver City Bicycle & Pedestrian Action Plan

The City of Culver City updated the Bicycle & Pedestrian Master Plan with the Bicycle & Pedestrian Action Plan (Action Plan), which received public input throughout 2017 through 2019. The Action Plan was adopted by Culver City Council in June 2020.[95] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network.

Culver City Clean Power Alliance

Clean Power Alliance (CPA) became the new electricity supplier for Culver City in February 2019 for residential customers and in May 2019 for non-residential customers. With this change, CPA purchases the renewable energy resources for electricity, and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA and remain with SCE as their provider.

City of Los Angeles

Los Angeles General Plan

The City of Los Angeles does not have a General Plan Element specific to climate change and GHG emissions, and its General Plan does not have any stated goals, objectives, or policies specifically addressing climate change and GHG emissions. However, the following six goals from the City of Los Angeles's General Plan Air Quality Element would also lead to GHG emission reductions:[96]

> Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure;
>
> Goal 2: Less reliance on single-occupancy vehicles with fewer commute and non-work trips;
>
> Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
>
> Goal 4: Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;

[95] City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.
[96] City of Los Angeles, Air Quality Element, June 1991, pp. IV-1 to IV-4.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting; and

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City of Los Angeles has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, whose goal is to lead the City of Los Angeles towards being a "zero waste" city by 2030. These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion for the City of Los Angeles to 76 percent as of 2013.[97] In addition, the City of Los Angeles adopted the Recovering Energy, Natural Resources, and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan in 2006, which aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.[98] The City of Los Angeles also approved the Waste Hauler Permit Program (Ordinance No. 181,519, Los Angeles Municipal Code (LAMC) Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City of Los Angeles–certified construction and demolition waste processors. The City of Los Angeles's Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City of Los Angeles's zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

Los Angeles Green Building Code

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the LAMC, referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Building Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9,

97 City of Los Angeles, Department of Public Works, LA Sanitation, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188. Accessed July 12, 2022.

98 City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.

Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

Los Angeles Green New Deal/Sustainable City pLAn

The City of Los Angeles addressed the issue of global climate change in *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan/ClimateLA") in 2007. This document outlines the goals and actions the City of Los Angeles has established to reduce the generation and emission of GHGs from both public and private activities.

In April 2019, the Green New Deal/Sustainable City pLAn(Sustainable City Plan 2019), was released, consisting of a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.[99] The City of Los Angeles's Green New Deal/Sustainable City pLAn is the first four-year update to the City of Los Angeles's first Sustainable City pLAn that was released in 2015.[100] It augments, expands, and elaborates on the City of Los Angeles's vision for a sustainable future and tackles the climate emergency with accelerated targets and new aggressive goals.

While not an adopted plan, the City of Los Angeles's mayoral-initiated Green New Deal/Sustainable City pLAn includes short-term and long-term aspirations pertaining to climate change. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per sf for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 million British thermal units per sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and ZEVs in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.

[99] City of Los Angeles, Green New Deal/Sustainable City pLAn, 2019.
[100] City of Los Angeles, Sustainable City pLAn, April 2015.

- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7ºF by 2025; and 3ºF by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the City Transportation Assessment Guidelines (TAG) (July 2019, updated July 2020) to provide the public, private consultants, and City of Los Angeles staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation assessment. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City of Los Angeles's strategy to reduce land use transportation related GHG emissions consistent with AB 32, SB 32, and SB 375.

Existing Conditions

GHG Emissions Inventory

CARB, a part of CalEPA, is responsible for the coordination and administration of both federal and State air pollution control programs within California. CARB compiles the State's GHG emissions inventory. Based on the 2019 GHG inventory data (i.e., the most updated inventory for which data are available from CARB), California emitted 418.2 MMT of CO_2e ($MMTCO_2e$) including emissions resulting from imported electrical power.[101] Between July 1, 2010 and July 1, 2021, the population of California grew by an annualized rate of 0.49 percent to a total of 39.36 million.[102] In addition, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product [GDP]) is declining. From 2000 to 2019, the carbon intensity of California's economy decreased by 45 percent while the GDP increased by 63 percent.[103] According to CARB, as of 2016, statewide GHG emissions dropped below the 2020 GHG Limit (431 $MMTCO_2e$) and have remained below this limit since that time.

Table 4.6-4, *State of California GHG Emissions*, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2019. As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at approximately 40 percent in 2019.

[101] CARB, California Greenhouse Gas Emissions for 2000-2019, 2021.

[102] California Department of Finance, E-6 Population Estimates and Components of Change by County, December 2021, https://dof.ca.gov/forecasting/demographics/estimates/estimates-e6-2010-2021/. Accessed July 14, 2022.

[103] CARB, California Greenhouse Gas Emissions for 2000-2019, 2021.

TABLE 4.6-4
STATE OF CALIFORNIA GHG EMISSIONS

Category	Total 1990 Emissions ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2019 Emissions ($MMTCO_2e$)	Percent of Total 2019 Emissions
Transportation	150.7	35%	166.1	39.7%
Electric Power	110.6	26%	58.8	14.1%
Commercial	14.4	3%	15.9	3.8%
Residential	29.7	7%	27.9	6.7%
Industrial	103.0	24%	88.2	21.1%
Recycling and Waste[a]	–	–	8.9	2.1%
High GWP/Non-Specified[b]	1.3	<1%	20.6	4.9%
Agriculture/Forestry	23.6	6%	31.8	7.6%
Forestry Sinks	-6.7	–	–[c]	–
Net Total (IPCC SAR) [d]	**426.6**	**100%**	–	–
Net Total (IPCC AR4) [e]	**431**	**100%**	**418.2**	**100%**

NOTES:

[a] Included in other categories for the 1990 emissions inventory.

[b] High Global Warm Potential (GWP) gases are not specifically called out in the 1990 emissions inventory.

[c] Forestry sinks were not calculated for 2019 pending a revised methodology under development. Forestry sinks are ecosystem carbon stored in plants and soils.

[d] IPCC = Intergovernmental Panel on Climate Change

[e] CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCE: CARB, . California Greenhouse Gas Emissions for 2000-2019, 2021.

Existing Site GHG Emissions

The Project Site is comprised of two properties on approximately 4.46-acres of land. 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, street edge, and building perimeter planting. 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. The Los Angeles Parcel is currently improved with an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. In addition to the floor area, there are 70 spaces of enclosed vehicular parking. Existing operational emissions for the Project Site are presented in **Table 4.6-5,** *Estimated Existing Project Site GHG Emissions.* Details regarding the calculation of the existing Project Site emissions are provided in Appendix B of this Draft EIR. The emissions from existing conditions will be subtracted from Project emissions and net emissions will be presented.

TABLE 4.6-5
ESTIMATED EXISTING PROJECT SITE GHG EMISSIONS

Emissions Sources	Project CO_2e (Metric Tons per Year)[a,b]
Existing Operational	
On Road Mobile Sources	1,625
Area (landscaping)	<1
Energy (electricity and natural gas)	336
Water Conveyance and Wastewater Treatment	5
Solid Waste	79
Existing Total Emissions	**2,045**

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

[b] CO_2e emissions are calculated using the global warming potential values from the IPCC AR4. Although the IPCC has released AR5 with updated GWPs, CARB reports the Statewide GHG inventory using the AR4 GWPs, which is consistent with international reporting standards.

SOURCE: ESA, 2022.

4.6.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to GHG emissions if it would:

- **GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- **GHG-2:** Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

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

be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)(3)).[104]

Although GHG emissions can be quantified, CARB, SCAQMD, the City of Culver City, and the City of Los Angeles have not adopted project-level significance thresholds for GHG emissions that would be applicable to the Project. The OPR released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[105] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[106]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. As previously stated, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.[107]

In the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's Climate Change Scoping Plan, 2020–2045 RTP/SCS, and City of Culver City's and City of Los Angeles's plans, programs, and policies including Culver City's Green Building Program, City of Los Angeles's Green New Deal/Sustainable City pLAn, and

[104] See generally CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16; see also Letter from Cynthia Bryant, Director of the OPR to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

[105] Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

[106] Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

[107] See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ABR's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014); SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

City of Los Angeles's Green Building Program (as discussed in subsection, *Local*) established for the purpose of increasing energy efficiency and reducing GHG emissions for new developments.

Methodology

Project GHG Emissions Estimates

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions from the Project. The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. For the purposes of this Draft EIR, total GHG emissions (i.e., construction and operation) from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site and off-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, diesel, and transportation fuels).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[108]

For purposes of this analysis, it was considered reasonable, and consistent with criteria pollutant calculations, to consider GHG emissions resulting from direct Project-related activities, including use of vehicles, emergency back-up generator, electricity, and natural gas, to be new emissions. These emissions include Project construction activities such as demolition, hauling, and construction worker trips, as well as operational emissions. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than temporary, GHG emissions were calculated on an annual basis. As previously discussed, the Project would remove existing warehouses and associated GHG emissions. The GHG emissions analysis subtracted existing emissions as a credit when calculating net Project emissions. GHG emissions for the Project are estimated using CalEEMod (Version 2020.4.0), which is a statewide land use emission computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, and is recommended by SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. Mobile source emissions have been estimated based on CARB's on-road vehicle emissions factor (EMFAC2021) model.

[108] Embodied energy includes energy required for water pumping and treatment for end-uses.

As discussed previously, both the City of Culver City and City of Los Angeles have adopted and implemented a range of GHG reduction activities and strategies including Culver City's Green Building Program, City of Los Angeles's Green New Deal/Sustainable City pLAn, and City of Los Angeles's Green Building Program (as discussed in subsection, *Local*) that would reduce GHG emissions. In addition, SCAG has adopted the 2020–2045 RTP/SCS applicable to the region, which outlines SCAG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in HQTAs and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for TOD and demonstrates a reduction in per capita GHG emissions relative to 2005 of nine percent in 2020 and 16 percent in 2035. The project-level analysis describes the consistency of the Project's GHG emission sources with local and regional GHG emissions reduction strategies.

Construction Emissions

Construction emissions are forecasted by assuming a conservative estimate of construction activities from each phase of the Project. Construction emissions are estimated using the CalEEMod software. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including off- and on-road vehicles. CalEEMod outputs construction related GHG emissions of CO_2, CH_4, and CO_2e.

Although construction would be continuous and overlapping for two buildings, to more accurately assess the emissions within CalEEMod, the construction schedules and activities were broken out separately for activities related to construction for each of the two buildings. Construction of Building 1 is projected to begin in first quarter of 2023 with completion by the fourth quarter of 2024 while construction of Building 2 would begin in the third quarter of 2023 with completion in the fourth quarter of 2025. Operations are expected to begin in 2026. Project construction activities would include site preparation, grading and excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, paving and architectural coating. Demolition activities would generate demolition debris (asphalt and general construction debris), which would require transport by haul truck. Soil excavation and grading activities would generate soil for export, which would require transport by haul truck. Heavy-duty construction equipment, vendor supply trucks and concrete trucks would be used during construction of foundations and buildings.

Consistent with calculations in Section 4.2, *Air Quality*, of this Draft EIR, in summary, construction emissions were forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions were estimated using the CalEEMod software as recommended by the SCAQMD. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis in Section 4.2, *Air Quality*, to generate GHG emissions values for each construction year.

SCAQMD's *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions."[109] The guidance recommends that construction project GHG emissions should be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies."[110] In accordance with that SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the Project.

Operational Emissions

Operation of the Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. CalEEMod was used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. GHG emissions would also be generated by Project-generated vehicle trips. Operational impacts were assessed for the first full Project buildout year in 2026.

This EIR quantifies the Project's annual GHG emissions and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB/SB 32. This approach mirrors the concepts used in CARB's Climate Change Scoping Plan, which demonstrates GHG reductions compared to a Project without implementation of GHG reduction characteristics, features, and measures where operational GHG emissions were calculated based on a scenario without Project Design Features and consistent with CARB's Climate Change Scoping Plan Statewide BAU forecast for the AB 32 target year of 2020 and continued reductions through SB 32 through 2030, but does not include SB 100 that was signed into law after CARB's Climate Change Scoping Plan. The Project without Reduction Features scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code, and does not account for trip reductions from availability of public transportation within a quarter mile. Mobile source emissions for the Project without Reduction Features are calculated from the unadjusted trips and unadjusted VMT in the City of Los Angeles VMT Calculator in Appendix B where adjusted trips, used for the Project with Reduction Features, account for USEPA developed equations altogether known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[111] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. . The Project without Reduction Features uses emission factors based on a scenario consistent with CARB's Scoping

[109] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed July 12, 2020.

[110] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed July 12, 2022.

[111] USEPA, Mixed-Use Trip Generation Model. Accessed July 12, 2022. https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model.

Plan statewide NAT forecast for the AB 32 target year of 2020 and continued reductions through 2030. Additionally, the Project without Reduction Features does not account for the 0.53 acre-feet/year reduction of water usage for the Los Angeles Parcel from the Project's water conservation measures. A 65 percent diversion rate of solid waste was assumed for the Project as well as the Project without Reduction Features scenario. This comparison is being done for informational purposes only, including to disclose the relative carbon efficiency of the Project. The City of Culver City, as lead agency, is focusing its determination of the significance of the Project's GHG emissions in relation to the Project's location and design and its consistency with local City of Culver City and City of Los Angeles regulatory schemes, as explained below.

With regard to energy demand, the Project's consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. CalEEMod was modified to include the energy usage and energy intensity factors shown in Section 4.14, *Utilities and Service Systems*, and the CalEEMod assumptions are included in Appendix B of the Draft EIR. The Project electricity demands are supplied by SCE and LADWP. The Project with Reduction Features uses a CO_2e intensity factor based on a projection for 2026 including SB 100 requirements, which requires local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by 2027, 60 percent by 2030, and 100 percent by 2045. The Project without Reduction Features uses the NAT scenario from the Climate Change Scoping Plan. Building electricity and natural gas usage rates account for the 2019 Title 24 Building Energy Efficiency Standards. The Project's GHG analysis conservatively assumes the Project's Culver City Parcel will remain with SCE as their electricity provider and will not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2026 based on the future trend under SB 100.[112]

Mobile emissions in both the Project with Reduction Features and the Project without Reduction Features were estimated based on emission factors from EMFAC along with Project VMT calculations as shown in the VMT Calculator in Appendix B, consistent with calculations in Section 4.2, *Air Quality*, of this Draft EIR. The Project would also implement a voluntary transportation demand management (TDM) Program (see Project Design Feature TRAF-PDF-2) that would reduce Project-related VMT (refer to Section 4.12, *Transportation*, of this Draft EIR, for additional details regarding the TDM Program features). These TDM Program features were not credited to the GHG analysis as they would be voluntary and are not included in the analysis in Section 4.12, *Transportation*.

An emergency generator is also included as part of the Project in both the Project with Reduction Features and the Project without Reduction Features. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). The 200-kW generator would have a USEPA rated Tier 4 engine. GHG emissions from the emergency generator were quantified using CalEEMod default emission factors as detailed in Appendix B. The emergency generator is

[112] For the purposes of estimating GHG emissions in this Draft EIR, the emissions analysis conservatively assumes Project would not switch electricity providers from SCE to the Clean Power Alliance (CPA) (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section if they chose 50 or 100 percent renewable electricity.

anticipated to operate for a maximum of 2 hours per day and 50 hours per year for maintenance and testing.

As previously described above, within Culver City, in 2019 all residential and commercial users were automatically enrolled in the CPA program. Electricity customers in the City of Culver City are automatically defaulted to receive electricity from 100 percent renewable resources unless they opt out of the CPA. However, the analysis for the Project with Reduction Features conservatively assumes that the renewable usage is equal to that of Southern California Edison's renewable production as predicted through SB 100 for Building 1.[113] Similarly, Los Angeles Department of Water and Power's renewable production as predicted through SB 100 is used for Building 2.

GHG emissions from solid waste disposal are calculated using waste quantities as provided in Section 4.14.3, *Utilities and Service Systems – Solid Waste*, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment. In addition, a 65 percent diversion rate of solid waste is assumed for the Project in both the Project with Reduction Features and the Project without Reduction Features.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. The Los Angeles Parcel would achieve a 0.53 acre-feet/year reduction from the Project's water conservation measures, which is incorporated in the Project with Reduction Features. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions were calculated using CalEEMod and were based on the water usage rate consistent with Section 4.14.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR, and Water Supply Assessments,[114,115] the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the appropriate electricity utility provider, and the emission factors for the wastewater treatment process consistent with Section 4.14.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR.

Other sources of GHG emissions from Project operation include landscaping equipment, such as lawnmowers and trimmers. The CalEEMod software uses landscaping equipment GHG emission factors from the CARB OFFROAD model and the CARB Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment.[116]

As previously stated, operational GHG impacts are calculated by subtracting existing emissions from Project emissions. The GHG emissions calculations incorporate GHG reductions

[113] The CPA allows for 100 percent, 50 percent, and 36 percent renewable energy content as well as the option to opt out of the program all together. Assuming that all of the City of Culver City's residents opt out of the program is a highly conservative assumptions and therefore the analysis will likely overestimate net Project emissions.

[114] EKI, Water Supply Assessment for Crossings Campus Building 1, March 31, 2022. Provided as Appendix O of this Draft EIR.

[115] Los Angeles Department of Water and Power, Water Supply Assessment - Crossings Campus Project, February 24, 2022. Provided as Appendix O of this Draft EIR.

[116] CARB, OFFROAD Modeling Change Technical Memo, 2003.

sustainability measures, some of which are required by regulation, such as the City of Culver City's Green Building Program requirements, and compliance with SCAQMD rules and regulations and reductions in energy, water, and waste demand.

Consistency with GHG Reduction Plan, Policies, and Actions

The Project's GHG emissions are also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by CARB, SCAG, the cities of Culver City and City of Los Angeles. A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB's Climate Change Scoping Plan and the 2020-2045 RTP/SCS. As discussed previously, the City of Culver City has adopted strategies and policies to reduce GHG emissions through its Green Building Program. Similarly, the City of Los Angeles has addressed goals and initiatives to reduce GHG emissions through its mayoral-initiated Green New Deal/Sustainable City pLAn and through the Los Angeles Green Building Code.

For this Project, the City of Culver City serves as the lead agency. OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City of Culver City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the CEQA Guidelines. However, the City of Culver City has adopted the Green Building Program and the City of Los Angeles had adopted the Los Angeles Green Building Code that encourage and require applicable projects to implement energy efficiency measures. In addition, the California CAT Report provided recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in HSC Division 25.5. Thus, if the Project is designed and operated in accordance with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reductions.

Project Design Features

The following project design feature would also be implemented as part of the Project:

GHG-PDF-1: **Green Building Features.** The Project will include the following green building features:

- The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code and Culver City's Green Building Program Requirements.
- The Project design will include sustainability features that will result in increased energy efficiency including water efficiency measures for landscaping and rainwater management, high efficiency plumbing fixtures, energy-star labeled appliances where possible and energy-efficient and water conserving HVAC systems.

In addition to Project Design Feature GHG-PDF-1, the Project would implement Project Design Feature TRAF-PDF-2 (TDM Program), which would reduce single occupancy trips, and VMT as

well as Project Design Feature WATER-PDF-1 (Water Conservation), which would reduce water consumption. These PDFs would also reduce GHG emissions.

Analysis of Project Impacts

Threshold GHG-1: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold GHG-2: Would the Project conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs?

Impact Analysis

Consistency with State Plans, Policies, or Regulations

In the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted for the purpose of reducing the emissions of GHGs.

The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included within the 2008 Climate Change Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, the City of Culver City's Green Building Program, and the City of Los Angeles's Green New Deal/Sustainable City pLAn and Los Angeles Green Building Code. As shown herein, the Project would be consistent with the applicable GHG reduction plans, policies, and regulations.

CARB's Climate Change Scoping Plan

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (i.e., AB 32) and codified into law in HSC Division 25.5. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in HSC Division 25.5.

In support of AB 32 and SB 32, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the Project. The primary focus of many of the statewide and regional plans, policies, and regulations is to address worldwide climate change.

The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. The Climate Change Scoping Plan builds off of a wide array of regulatory requirements that have been promulgated to reduce statewide GHG emissions, particularly from energy demand and mobile sources. While these regulatory requirements are not targeted at specific land use development projects, they would serve to reduce a development project's GHG emissions.

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial, etc.). This category of regulations can be grouped in terms of the GHG sector that benefit from their implementation. With regard to the energy sector, implementation of the California RPS program (SB 100), SB 350, and the Energy Independence and Security Act of 2007 (EISA) would reduce GHG emissions generated by energy consumption. With regard to the mobile sector, implementation of the Advanced Clean Cars Program, Advanced Clean Truck Regulation, Low Carbon Fuel Standard (Executive Order S-01-07) and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the SB 1368/AB 398, CCR Title 20, and the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. With regard to the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Lastly, with regard to the water sector, implementation of SB X7-7 would reduce GHG emissions associated with the energy used by the infrastructure required for the conveyance of water. Further, the Project development would occur in accordance with these regulations and, therefore, would comply with their requirements and would not conflict with the implementation of these regulations.

Table 4.6-6, *Project Consistency with Applicable 2017 Climate Change Scoping Plan Actions and Strategies*, contains a list of GHG-reducing strategies applicable to the Project. The analysis describes the Project's and consistency with these strategies. As discussed below, the Project would implement design features and incorporate characteristics to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrate that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study or not currently feasible at the time the 2017 Scoping Plan was adopted could enable the State to meet the 2050 targets. For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, but that this type of policy would be necessary to meet the 2050 target.

With statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's GHG emissions to decline from their opening year levels as reported below, as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

TABLE 4.6-6
PROJECT CONSISTENCY WITH APPLICABLE
2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
RPS Program, SB2X, and SB 350: The California Renewable Portfolio Standard requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California Renewable Portfolio Standard (RPS) program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	CPUC, CEC, CARB	**No Conflict.** The Project would use electricity provided by SCE and LADWP, which would both comply with the Renewable Portfolio Standard and SB 100, which is more stringent than SB 350 for renewable energy resources. Per the updated requirements of SB 100, signed by Governor Brown on September 10, 2018, electricity providers would be required to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and should plan to achieve 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. Thus, the Project would be supplied with electricity via renewable sources at increasing rates over time reducing the Project's electricity related GHG emissions. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, heating, ventilation, and air conditioning (HVAC) systems, and insulation. The Project would meet or exceed the applicable requirements of Title 24, Part 6, as well as the CALGreen Building Code in Title 24, Part 11 as adopted and amended in the City of Culver City Green Building Program and City of Los Angeles Green Building Code. The Project would further support this action and strategy by incorporating sustainability features to be incorporated into the Project such as Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation and adequate daylight and views. This is further described in Project Design Feature GHG-PDF-1.
CCR, Title 20: The 2016 Appliance Efficiency Regulations, adopted by the CEC include standards for new appliances and lighting, if they are sold or offered for sale in California. [a] Presented in the 2008 Scoping Plan as Measure E-1 and CR-1.		**No Conflict.** The Project would adhere to CCR, Title 20 as part of its compliance with the City of Culver City's Green Building Program and City of Los Angeles's Green Building Code.
Million Solar Roofs Program: The program is implemented through SB 1 which provides up the $3.3 billion in financial incentives for the installation of residential, commercial, and institutional solar PV programs. Presented in the 2008 Climate Change Scoping Plan.		**No Conflict.** The Applicant would comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Implement Mobile Source Strategy (Cleaner Technology and Fuels): • At least 1.5 million zero-emissions and plug-in-hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero-emissions and plug-in-hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations.[b] • Implementation of federal phase 2 standards for medium- and heavy-duty vehicles. • Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero-emissions buses with the penetration of zero-emissions technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard. • Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emissions trucks primarily for class 3–7 last-mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion." • **Advanced Clean Car Program**: The ACC program includes LEV regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce PHEV in the 2018 through 2025 model years.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), Caltrans, CEC, OPR, Local Agencies	**No Conflict.** CARB approved the Advanced Clean Cars Program that includes LEV regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce PHEVs in the 2018 through 2025 model years. While this action does not directly apply to individual projects, the standards would apply to all vehicles purchased or used by employees or visitors to the Project. The Project would designate 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 EVSE would be installed for Building 1, and 74 EVSE would be installed for Building 2. The Project would comply with City of Culver City Municipal Code, LAMC, CALGreen Building Code, and LEED Gold Equivalent as applicable for electric vehicle parking. As such, the Project would support compliance with this regulation. The Advanced Clean Truck Regulation has two components, a manufacturer sales requirement and a reporting requirement. The manufacturer component of the regulation requires manufacturers that certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emissions trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emissions truck/chassis sales would need to be 55 percent of Class 2b–3 truck sales, 75 percent of Class 4–8 straight truck sales, and 40 percent of truck tractor sales. The reporting component of the regulation requires large employers including retailers, manufacturers, brokers and others to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations.[b] Because deliveries to the Project Site would be made by trucks subject to this regulation, the Project would benefit from these measures. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. GHG emissions generated by transit trips by Project employees and the existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Station as designated by the TDM Program, as required by Project Design Feature TRAF-PDF-2, would be reduced under this regulation. GHG emissions generated by Project-related passenger, truck, and bus trips would benefit from the above regulations and programs, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, Advanced Clean Truck Regulation, and Innovative Clean Transit measure consistent with reduction of GHG emissions under SB 32.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
• **Advanced Clean Truck Regulation:** The Advanced Clean Truck Regulation has two components, a manufacturer sales requirement and a reporting requirement. The manufacturer component of the regulation requires manufacturers that certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emissions trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emissions truck/chassis sales would need to be 55 percent of Class 2b–3 truck sales, 75 percent of Class 4–8 straight truck sales, and 40 percent of truck tractor sales. The reporting component of the regulation requires large employers, including retailers, manufacturers, brokers and others, would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emissions trucks and place them in service where suitable to meet their needs.		SB 375 requires SCAG to direct the development of the RTP/SCS for the region, which is discussed in this Draft EIR. The Project would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern, as further discussed below in Table 4.6-7. The Project would be constructed on an existing developed site and would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's development pattern or transportation network. As shown in the VMT Calculator in Appendix B, the Project is anticipated to generate approximately 3,786 average daily weekday vehicle trips. The Project is located less than one-tenth of a mile from the Metro "E" Line Culver City Station across National Boulevard from the Project Site and well within a key Transit Priority Area (TPA). Therefore, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT. As part of Project Design Feature TRAF-PDF-2, the Project would be served by an existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Culver City Station, which would further reduce VMT. As such, the Project would not conflict with the VMT reduction standards of the 2020–2045 RTP/SCS. Thus, the Project would be compliant with, and would not conflict with, applicable 2020–2045 RTP/SCS actions and strategies to reduce GHG emissions.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets).	CARB	**No Conflict.** Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region. As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years, which have been updated in 2018. As part of the 2018 updates, CARB adopted a passenger vehicle related GHG reduction of 19 percent per capita for 2035 for the SCAG region. The Project is located less than one-tenth of a mile from the Metro "E" Line Culver City Station across National Boulevard from the Project Site and well within a key TPA. Therefore, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT. As such, the Project would not conflict with the 2020–2045 RTP/SCS goal of reducing daily VMT per capita and proving local community serving uses in infill locations.
By 2019, develop pricing policies to support low-GHG transportation (e.g., LEV zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**No Conflict.** The Project would support this policy through the TDM Program that includes financial incentives for using public transit.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Adopt an LCFS with a CI reduction of 18 percent.	CARB	**No Conflict.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would be reduced by this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions provided in Table 4.6-11 were calculated using EMFAC and Project VMT. However, EMFAC does not include implementation of the LCFS into mobile source emission factors. Thus, Table 4.6-11 provides conservatively estimated GHG emissions. On September 27, 2018, CARB approved an amendment to the LCFS regulation to require a 20 percent reduction in carbon intensity from a 2010 baseline by 2030. Reductions in carbon intensity are phased in starting in 2019 with a reduction of 6.25 percent and increases by 1.25 percent each year. Thus, in 2021, LCFS emissions reductions are 8.75 percent reduced carbon intensity relative to the 2010 baseline. Project-related mobile source GHG emissions would be reduced accordingly, and would be further reduced as LCFS compliance increases to 20 percent reduce carbon intensity by 2030 relative to the 2010 baseline year.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40-percent reduction in CH_4 and hydrofluorocarbon emissions below 2013 levels. • 50-percent reduction in black carbon emissions below 2013 levels.	CARB, California Department of Resources Recycling and Recovery (CalRecycle), California Department of Food and Agriculture (CDFA), California State Water Resources Control Board (SWRCB), Local air districts	**No Conflict.** SB 605, adopted in 2014, directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. SB 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for CH_4 and HFCs and 50 percent black carbon emissions below 2013 levels.[c] These reductions can be achieved by recovering organic waste and meeting organic disposal reduction targets. SB 1383 requires various agencies including CARB, California Department of Food and Agriculture (CDFA), the State Water Resources Control Board (SWRCB) to be responsible for adopting regulations to reduce GHG emissions. These regulations would be applicable to the Project and would be a regulatory requirement of the Project. Therefore, the Project would comply with the CARB SLCP Reduction Strategy, which limits the use of HFCs for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025.[c] **California Integrated Waste Management Act (IWMA) of 1989 and AB 341:** The IWMA mandated that State agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No Conflict.** While this action does not directly apply to individual projects, the Project would comply with the IWMA inasmuch as it would be served by a solid waste collection and recycling service that includes mixed waste processing and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets. According to the City of Los Angeles Zero Waste Progress Report, the City of Los Angeles achieved a landfill diversion rate of approximately 76 percent by year 2012. The Project would be consistent with AB 341, which requires not less than 75 percent of solid waste generated to be source reduced through recycling, composting, or diversion. This reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Implement the post-2020 Cap-and-Trade Program with declining annual caps. As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to land use development. The declining limit on covered sources of GHG emissions creates a powerful economic incentive for significant investment in cleaner, more efficient technologies.	CARB	**No Conflict.** AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions. Under the Cap-and-Trade program, entities such as power generation companies and natural gas processing plants would be required to limit or reduce GHG emissions. While the Project itself is not a regulated entity under the Cap-and-Trade Program, it would result in a reduction of GHG emissions associated with the Project's energy usage, since energy supplied to the Project would be from a regulated entity. As described earlier, post buildout emissions would be reduced from Project features relating to energy, transportation, water and waste. As the Project would not impede the Program's progress, the Project is considered compliant.

[a] SB 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.

[b] CARB, Advance Clean Cars, 2017 Midterm Review, https://ww2.arb.ca.gov/resources/documents/2017-midterm-review-report. Accessed July 12, 2022.

[c] CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, https://www.calrecycle.ca.gov/climate/slcp/. Accessed July 12, 2022.

SOURCE: ESA, 2022.

Based on the analysis above, the Project would be consistent with CARB's Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan) and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the State's GHG reduction targets for 2030 and 2050. Therefore, impacts would be less than significant.

SCAG 2020–2045 RTP/SCS

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including the 2020–2045 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, the 2020–2045 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of the 2020–2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT, (2) increased use of alternative fuel vehicles, and (3) improved energy efficiency. These strategies and policies are addressed below.

In order to assess the Project's potential to conflict with the 2020–2045 RTP/SCS, this section analyzes the Project's land use characteristics for consistency with the strategies and policies set forth in the 2020–2045 RTP/SCS to meet GHG emission-reduction targets set by CARB.[117] Generally, projects are considered to not conflict with applicable land use plans and regulations, such as SCAG's 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project would support reducing VMT given that it would place offices near public transit, provide bicycle and pedestrian accessibility, and offer a voluntary TDM Program. As previously discussed, the Project is located less than one-tenth of a mile from the Metro "E" Line Culver City Station across National Boulevard from the Project Site, and well within a key TPA. The Project would not conflict with the 2020–2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce

[117] As discussed in the 2020–2045 RTP/SCS, the actions and strategies included in the 2020–2045 RTP/SCS remain unchanged from those adopted in the 2012-2035 and 2016-2040 RTP/SCS.

vehicular demand and associated emissions. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with jobs near a variety of transportation and housing choices, which would reduce automobile use.

Integrated Growth Forecast

The Project does not provide residential uses, and, as such, population and housing growth are not relevant metrics for the Project's consistency with SCAG's 2020–2045 RTP/SCS actions and strategies. However, with respect to employment, consistent with SCAG's 2020–2045 RTP/SCS alignment of transportation and land use strategies, the Project would accommodate increases in employment and associated travel demand.

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. While the Project does not propose residential uses, new employees would be introduced by the Project as the main Project land use would be office space suitable for approximately 2,400 employees. SCAG's final growth forecast for employment details 1,899,500 employees in 2020 to 2,169,100 employees in 2040 in the City of Los Angeles and 49,100 employees in 2020 and 53,000 employees in 2040 in the City of Culver City. [118] These increases in employees would represent approximately 0.009 percent of the growth in employees projected for both cities combined in the 2016–2040 RTP/SCS, between 2020 and 2040. Accordingly, the Project's generation of employees would not conflict with employment generation projections contained in the 2020–2045 RTP/SCS. Refer to Section 4.9, *Land Use and Planning*, of this Draft EIR, for additional information regarding consistency with the 2020–2045 RTP/SCS.

VMT Reduction Strategies and Policies

As similarly described in Section 4.12, *Transportation*, the Project is well served by transit, the existing fixed-route intercampus shuttle program, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program between Apple buildings in Culver City and the Metro "E" Line Station as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, that runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with

[118] Based on SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction.

respective city codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions, and would not conflict with the VMT Reduction Strategies and Policies of the 2020–2045 RTP/SCS.

The Project would also not be in conflict with the following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS as substantiated below, which are based on changing the region's land use and travel patterns in the following key areas:[119]

- Compact growth in areas accessible to transit
- Locate jobs in proximity to transit
- Locate job growth focused in Priority Growth Areas
- Biking and walking infrastructure to improve active transportation options and transit access

As described above, the Project would concentrate office spaces in an area served by several transit providers within the immediate vicinity of the Project Site. The 2020–2045 RTP/SCS focuses on orienting job growth in Priority Growth Areas served by high quality transit and into other infill areas where urban infrastructure including housing and other services already exists. The Project supports this by locating office spaces in an area well served by public transit, an existing fixed-route intercampus shuttle program, and bicycle/pedestrian facilities. Furthermore, the Project would also provide 175 bicycle spaces. Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions, which would not conflict with the goals of the 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

A goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emissions technologies. The Project would designate 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 EVSE would be installed for Building 1, and 74 EVSE would be installed for Building 2. The Project would comply with City of Culver City Municipal Code, LAMC, and the CALGreen Building Code as applicable for electric vehicle parking. As such, the Project would not conflict with this goal of the 2020–2045 RTP/SCS.

Energy Efficiency Strategies and Policies

The 2020–2045 RTP/SCS includes strategies for individual developments, such as the Project, to improve energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. As discussed in Chapter 2, *Project Description*, of the Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the applicable Los Angeles Green Building Code or Culver City Green Building Program, and CALGreen Building Code. These standards would reduce energy and water

[119] SCAG, 2020-2045 RTP/SCS, May 2020, pp. 3, 21, 26, 50, 52, 69, and 144.

usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The Project would also achieve LEED Gold equivalent. The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective city codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation and adequate daylight and views. These measures were generally accounted for based on compliance with 2019 Title 24 standards. Furthermore, the Applicant will pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code in order to achieve compliance with the City of Culver City's solar photovoltaic requirement. Therefore, based on the above, the Project would not conflict with energy strategies in the 2020–2045 RTP/SCS.

Land Use Characteristics

In order to assess the Project's consistency with the 2020–2045 RTP/SCS, this Draft EIR also analyzes the Project's land use characteristics, such as density and proximity to job centers, for consistency with those utilized by SCAG in its SCS. The Project's consistency with the applicable land use goals and principles set forth in the 2020–2045 RTP/SCS is discussed in Section 4.9, *Land Use and Planning*, and **Table 4.6-7,** *Consistency with Applicable SCAG 2020–2045 RTP/SCS Actions and Strategies*. As concluded therein, the Project would not conflict with applicable land use strategies of the 2020–2045 RTP/SCS.

As discussed in the above analysis, the Project would not conflict with and would support the applicable goals and benefits of the 2020–2045 RTP/SCS to reduce GHG. Accordingly, the Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

TABLE 4.6-7
CONSISTENCY WITH APPLICABLE SCAG 2020–2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood-oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	**No Conflict.** This action applies to local jurisdictions, Council of Governments (COGs), SCAG and County Transportation Commissions (CTCs). While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by designating 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 EVSE would be installed for Building 1, and 74 EVSE would be installed for Building 2. The Project would comply with City of Culver City Municipal Code, LAMC, and CALGreen Building Code as applicable for electric vehicle parking.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements by providing convenient access to and from on-site uses. The Project is served by the Ballona Creek Bike Path, a Class I facility, that runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective city codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Furthermore, a TDM Program, as required by Project Design Feature TRAF-PDF-2, would encourage alternative transportation choices by employees accessing the Project Site.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions, the Project would support this action/strategy by adding office spaces in an area developed primarily with a mix of commercial and residential 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. The Los Angeles Parcel specifically is located within the Venice/National TOD subarea. The Project would support the Project Objective to reduce VMT by increasing employee density in proximity to transit and housing.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**No Conflict.** While this action applies to the State and SCAG, the Project would be consistent with and would not conflict with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs. The Project is an office development that would increase employee density in proximity to transit and housing and would provide bicycling and pedestrian facilities. Furthermore, the Project would include a TDM Program, as required by Project Design Feature TRAF-PDF-2, to reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Transportation Network Actions and Strategies		
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions, SCAG and CTCs, the Project is currently served by the Metro "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle between Apple buildings in Culver City and the Metro "E" Line Station as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and CTCs, the Project's land use characteristics, including its location near transit, housing and bicycle/pedestrian facilities, would encourage non-automotive forms of transportation. Additionally, the Project's TDM Program, as described in Section 4.12, *Transportation*, of this Draft EIR, would provide financial incentives for transit use.
Transportation Demand Management (TDM) Actions and Strategies		
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project is proposed in an area well served by public transit. The Project would also provide a TDM Program, as described in Section 4.12, *Transportation*, of this Draft EIR, which would include an online tool for ridesharing and bicycling and pedestrian facilities as well as financial incentives to use them.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	**No Conflict.** While this action applies to local jurisdictions and CTCs, the telecommuting programs for the Project's uses will depend on the office tenants that occupy those uses. While the Project would not implement any telecommuting programs, the Project would provide a TDM Program, as described in Section 4.12, *Transportation*, of this Draft EIR, which would provide TDM support services and a comprehensive website detailing alternative transportation options.
Clean Vehicle Technology Actions and Strategies		
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emissions technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	SCAG, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project would not interfere with the City of Culver City or City of Los Angeles's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. The Project would designate 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 electric vehicle charging stations (EVSE) would be installed for Building 1, and 74 EVSE would be installed for Building 2. The Project would comply with City of Culver City, LAMC, CALGreen Building Code, and LEED Gold Equivalent as applicable for electric vehicle parking.

SOURCE: SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), May 2020, p. 21 and 46. The actions and strategies included in the 2020-2045 RTP/SCS are similar to, and consistent with the 2012-2035 and 2016-2040 RTP/SCS.
ESA, 2022.

Culver City's Green Building Program and City of Los Angeles Green Building Code

As discussed in Chapter 2, *Project Description*, of the Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the applicable Los Angeles Green Building Code or Culver City Green Building Program, and CALGreen Building Code. These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The Project would achieve LEED Gold equivalent. The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective city codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation and adequate daylight and views. These measures were generally accounted for based on compliance with 2019 Title 24 standards. Furthermore, the Applicant will pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code in order to achieve compliance with the City of Culver City's solar photovoltaic requirement. Therefore, based on the above, the Project would not conflict with Culver City's Green Building Program or City of Los Angeles Green Building Code.

City of Los Angeles's Green New Deal/Sustainable City pLAn

The significance of the Project's GHG emissions is next evaluated based on whether they would be generated in connection with a design that is consistent with and would not conflict with relevant City of Los Angeles' goals and actions designed to encourage development that results in the efficient use of public and private resources. One such set of goals and actions is contained in the Mayor's Green New Deal/Sustainable City pLAn. While not ana adopted plan and not intended solely to reduce GHG emissions, within the Green New Deal/Sustainable City pLAn, climate mitigation is one of eight explicit benefits that help define its strategies and goals. **Table 4.6-8**, *Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal/Sustainable City pLAn GHG Emissions Goals and Actions*, contains a list of GHG emission-reducing strategies applicable to the Project. The analysis describes the consistency of the Project with these GHG emissions-reduction goals and actions. As discussed in Table 4.6-8, the Project would be consistent with and would not conflict with the applicable goals and actions of these plans. the Green New Deal/Sustainable City pLAn. Therefore, impacts pertaining to consistency with the City's Green New Deal/Sustainable City pLAn would be less than significant. Pages 4.6-66 through 4.6-68 below include a discussion of GHG emissions reductions from Project characteristics and design features for those characteristics and features that are quantifiable.

TABLE 4.6-8
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL/SUSTAINABLE CITY PLAN GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Chapter 3: Local Water	
Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.	**No Conflict.** While this action primarily applies to the City of Los Angeles and LADWP and not to individual projects, the Project design incorporates water efficiency measures via compliance with the City's requirements and the CALGreen Building Code.
Chapter 4: Clean and Healthy Buildings	
Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/square feet in 2015).	**No Conflict.** While this action applies to City of Los Angeles' departments and not to private development, the Project is designed and would operate to meet or exceed the applicable requirements of the CALGreen Building Code, and the Los Angeles Green Building Code. The Project would also achieve LEED Gold equivalent efficiency standards which would allow the Project to exceed Title 24 energy efficiency standards.
All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.	**No Conflict.** While this action primarily applies to the City of Los Angeles, the Project would comply with the State's and City's requirements that are designed to reduce GHG emissions over time, including the Los Angeles Green Building Code, Title 24, and other increasingly stringent energy conservation programs. The Project would also achieve LEED Gold equivalent efficiency standards which would allow the project to exceed Title 24 energy efficiency standards. In addition, The Project would help the City move toward a net zero carbon future.
Chapter 6: Mobility & Public Transit	
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.	**No Conflict.** While this action applies primarily to the City, the Project would encourage the use of transit as the Project Site and Study Area are currently served by the Metro "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program between Apple buildings in Culver City and the Metro "E" Line Station as part of the TDM Program would reduce single occupancy vehicle trips. The Project would reduce VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes.
Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.	**No Conflict.** While this action applies to the City and not to individual projects, as indicated in Fehr and Peers' Transportation Impact Study, dated July 2022, the Project is screened from having to conduct a VMT analysis and is presumed to have a less than significant impact on VMT. The Project would also promote a pedestrian-friendly community by placing office uses within walking distance to transit, retail and housing. The Project Site is located in a HQTA as designated by the 2020–2045 RTP/SCS. The Project would also provide bicycle parking accordance with the requirements of each city.

Target	Project Consistency
Chapter 7: Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.	**No Conflict.** While this action applies to the City and not to individual projects, the Project would encourage the use of EV by providing EV chargers and parking spaces capable of supporting EVSE. The Project would designate 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 EVSE with EV chargers would be installed for Building 1, and 74 EVSE with EV chargers would be installed for Building 2. The Project would comply with City of Culver City Municipal Code, LAMC, CALGreen Building Code, and LEED Gold Equivalent as applicable for electric vehicle parking. As such, the Project would support compliance with this regulation.
Chapter 9: Waste & Resource Recovery	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	**No Conflict.** While this action applies to the City of Los Angeles and not to individual projects, the Project would be served by the City's solid waste collection and recycling service, which would comply with this goal. In addition, the Project would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal/Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills.
Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).	**No Conflict.** While this action applies to the City of Los Angeles and not to individual projects, the Project would be served by a solid waste collection and recycling service which would participate in City of Los Angeles trash services, including separating trash from recycling through the use of blue and green recycling bins provided by the LA Sanitation Department.
Eliminate organic waste going to landfill by 2028.	**No Conflict.** While this action applies to City of Los Angeles, the Project, would support this by participating in City of Los Angeles trash services, including the participation in the organic waste recycling program.
Chapter 11: Urban Ecosystems & Resilience	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 4 degrees by 2035.	**No Conflict.** As noted in Chapter 2, *Project Description*, of this Draft EIR, the Project would include widened sidewalks, street trees, and landscaped parkways along Venice Boulevard and National Boulevard. All existing street trees that are removed would be replaced at a 2:1 ratio. In addition, the Project would provide a 51,600-sf internal courtyard with landscaping (available to Project employees and visitors) consisting of a central courtyard and terraces. The Project would also provide 7,120 sf of publicly accessible, privately maintained amenity area. with landscaping These landscaping characteristics would minimize the urban heat island effect.

SOURCE: City of Los Angeles, L.A.'s Green New Deal/Sustainable City pLAn (Sustainable City pLAn 2019), 2019; ESA, 2022.

City of Los Angeles's Green Building Code

The Project would comply with the Los Angeles Green Building Code's intent to reduce GHG emissions by complying with energy-efficiency requirements, incorporating water efficiency measures Code, installing energy-efficient appliances and equipment, and complying with the 2019 California Title 24 Building Energy Efficiency Standards, as amended by the city of Los Angeles. The Project would be designed to optimize energy performance and reduce building energy cost for new construction, which would meet the minimum building energy performance standards of the Los Angeles Green Building Code. The Project would also fulfill the mandatory requirements of the CALGreen Building Code as amended by the city of Los Angeles by incorporating strategies

such as water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; and bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. Therefore, the Project would be consistent with the Los Angeles Green Building Code.

Post-2030 Analysis

Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[120] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. These targets would build upon those originally established under AB 32 which required reducing statewide GHG emissions to 1990 levels by 2020. As discussed above, SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. The Project Design Features TRAF-PDF-2 and GHG-PDF-1 advance these goals by reducing VMT, increasing the use of electric vehicles, improving energy efficiency, and reducing water usage.

Further, the Project's consistency with SCAG's RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals. The 2020–2045 RTP/SCS would result in an estimated 19 percent decrease in per capita GHG emissions from passenger vehicles by 2035. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. Specifically, the Project is an office project located within a TPA and HQTA in close proximity to multiple public transit options. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets for 2030 and beyond.

[120] Energy and Environmental Economics (E3). "Deep Decarbonization in a High Renewables Future, Updated Results from the California PATHWAYS Model" (June 2018) Mahone, Amber. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from agencies, E3 developed long-term scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. The model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

The emissions modeling in the 2017 Update to the Scoping Plan has projected 2030 statewide emissions, which take into account known commitments (reduction measures) such as SB 375, SB 350, and other measures. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Update to the Scoping Plan assumed a scenario in which cap-and-trade would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2017 Update to the Scoping Plan, additional measures to achieve the 2030 targets and beyond are outside of the cities' or the Project's control. Therefore, any evaluation of post-2030 Project GHG emissions would be speculative.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's net emissions level to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's total emissions at build-out presented below represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year (2050) goal. Further, the Project's consistency with SCAG's 2016–2040 RTP/SCS and 2020–2045 RTP/SCS demonstrates that the Project will be consistent with the post-2030 GHG reduction goals.

Executive Orders S-3-05 and B-30-25 establish a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal has not been codified by the Legislature, and CARB has not adopted a strategy or regulations to meet the 2050 goal. However, studies have shown that, in order to meet the 2050 goal, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its original 2008 Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[121] In the 2014 Scoping Plan, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[122] The 2017 Scoping Plan recognizes that additional work is needed to achieve the more stringent 2050 target: "While the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80 percent below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals."[123] For example, the 2017 Scoping Plan acknowledges that "though Zero Net Carbon Buildings are not feasible at this time and more work needs to be done in this area, they will be necessary to achieve the 2050 target. To that end,

[121] CARB, Climate Change Scoping Plan, December 2008, p. 117.
[122] CARB, 2014 Scoping Plan, May 2014, p. 32.
[123] CARB, 2017 Scoping Plan, November 2017, p. 18.

work must begin now to review and evaluate research in this area, establish a planning horizon for targets, and identify implementation mechanisms." [124]

- **Energy Sector:** Continued improvements in California's lighting, appliance, and building energy efficiency programs and initiatives, such as the State's building energy efficiency standards and zero net energy building goals, would serve to reduce the Project's emissions level. Additionally, further technological improvements and additions to California's renewable resource portfolio including SB 100 would favorably influence the Project's emissions level. The Project would incorporate Energy Star–labeled appliances, where possible, and energy-efficient and water conserving HVAC systems as part of its LEED Gold Equivalent certification (see Project Design Feature GHG-PDF-1). The Project would be designed to comply with the City of Culver City's Green Building Program and City of Los Angeles's Green Building Code.
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level. The Project would implement a voluntary TDM Program, as further described in Project Design Feature TRAF-PDF-2 (TDM Program).
- **Water Sector:** The Project's emissions level will be reduced as a result of further enhancements to water conservation technologies as described in Project Design Feature WATER-PDF-1. The Los Angeles Parcel would achieve a 0.53 acre-feet/year reduction from the Project's water conservation measures.
- **Waste Management Sector:** Plans to further improve recycling, reuse, and reduction of solid waste will beneficially reduce the Project's emissions level. The Project would achieve at least a 65 percent waste diversion goal.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions to decline as the regulatory initiatives identified by CARB in the Climate Change Scoping Plan are implemented, and other technological innovations occur. The Project's total emissions at build-out presented in **Error! Reference source not found.** on page **Error! Bookmark not defined.** in the analysis above, represents the emissions inventory for the Project. That inventory takes into account existing regulations, and regulations that would apply to the Project at its build out year. Refer to **Error! Reference source not found.** and **Error! Reference source not found.** on pages **Error! Bookmark not defined.** and **Error! Bookmark not defined.**, respectively, for applicable regulatory measures that would serve to reduce GHG impacts from the Project. As such, the Project is consistent with the Executive Order's horizon-year (2050) goal.

For the reasons described above, the Project's post-2030 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

Carbon Neutrality

Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB will work with relevant state agencies to develop a framework for implementation

[124] CARB, 2017 Scoping Plan, November 2017, p. 18.

and accounting that tracks progress towards this goal, as well as ensuring that future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

CARB has released a study evaluating three scenarios that achieve carbon neutrality in California by 2045. These scenarios include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. **Table 4.6-9**, *Project Consistency with 2045 Carbon Neutrality Goals*, provides a summary of key emission reduction strategies to achieve carbon neutrality by 2045. In addition, Table 4.6-9 demonstrates how the Project would be consistent with these measures.

Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State. The Project would be required to comply with regulations in support of the goal of Carbon Neutrality by 2045 and would therefore support, and be consistent with, the State's achievement of the goals included in Executive Order B-55-18.

TABLE 4.6-9
PROJECT CONSISTENCY WITH 2045 CARBON NEUTRALITY GOALS

Sector/Description	Project Consistency
Sector: Low Carbon Fuels	
The State would use advanced biofuels for ground transportation, renewable aviation fuel and biomethane for electricity generation. Hydrogen may also be blended into pipeline gas demand as well as hydrogen for fuel cell transportation.	**No Conflict.** This action primarily applies to the transportation fuel providers. However, the Project would source transportation fuel from these providers to comply with these reduction measures.
Sector: Buildings	
The State would require 100 percent of sales of electric appliances by 2030 through 2040.	**No Conflict.** The Project would be all electric except for natural gas use in the cafeteria area. Any purchases of appliances after 2030 would be consistent with state requirements.
Sector: Transportation	
The State would require 100 percent Battery Electric Vehicle (BEV) sales for Light Duty Vehicles (LDV) and Medium Duty Vehicles (MDV) as early as 2030. Sales of Heavy Duty Vehicles (HDV) would achieve at least 45 percent BEV or CNG as early as 2035. At least 50 percent of rail within the State would be electrified and 50 percent of in-state aviation would be electrified.	**No Conflict.** Employees and visitors to the Project Site that purchase vehicles within the State would comply with BEV or CNG vehicle sales requirements. Therefore, the Project would not conflict with requirements on sales of BEV or CNG powered vehicles. The Project would encourage the use of EV by providing EV chargers and parking spaces capable of supporting EVSE. The Project would designate 192 electric vehicle spaces for Building 1, and 222 electric vehicle spaces for Building 2. Of those spaces, 48 EVSE with EV Chargers would be installed for Building 1, and 74 EVSE with EV Chargers would be installed for Building 2. The Project would comply with City of Culver City Municipal Code, LAMC, CALGreen Building Code, and LEED Gold Equivalent standards as applicable for EV parking.
Sector: Electricity	
Electricity generation within the state is fueled with natural gas, biomethane, or hydrogen. At least 95 percent of electricity generation would be zero carbon.	**No Conflict.** While this action applies to the City of Los Angeles/City of Culver City and not to individual projects, the Project would be served by LADWP and SCE. Both utilities would comply with these reduction measures.

Sector/Description	Project Consistency
Sector: High GWP and Non-Combustion	
Landfill and wastewater methane would be reduced by 23 percent. Pipeline fugitive emissions would be reduced by 72 percent, agricultural methane would be reduced by 41 percent and refrigerants would be reduced by 75 percent. Percent reductions are relative to Year 2020.	**No Conflict.** While this action applies to the City of Los Angeles/City of Culver City and not to individual projects, the Project would be served by a solid waste collection and recycling service that would achieve a 65 percent waste diversion goal as specified in Section 4.14.3, *Utilities and Service Systems – Solid Waste*, of this Draft EIR. In addition, the Project would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) for the city of Los Angeles. The Project would also comply with the City of Culver City Municipal Code for waste handling. As discussed in Section 4.14.3, the City of Culver City achieved a 70 percent diversion rate in 2015 as a result of a combination of measures required in the City's Source Reduction and Recycling Element.
Sector: Carbon Dioxide Removal	
At least 33 million metric tons/year of carbon dioxide removal needed in 2045.	**No Conflict.** As noted in Chapter 2, *Project Description*, of this Draft EIR, the Project would include widened sidewalks, street trees, and landscaped parkways along Venice Boulevard and National Boulevard. Based on jurisdictional requirements (Culver City/City of Los Angeles), six street trees would be planted along Building 1 frontage on National Boulevard and 28 street trees would be planted along Building 2 frontages on Venice and National Boulevards (City of Los Angeles). All existing street trees that are removed would be replaced at a 2:1 ratio. In addition, the Project would provide a 51,600-sf internal courtyard with landscaping (available to Project employees and visitors) consisting of a central courtyard and terraces. The Project would also provide a 7,120 sf publicly accessible, privately maintained amenity area with landscaping.

SOURCE: CARB, Achieving Carbon Neutrality in California, Table 1, October 2020.; ESA, 2022.

Construction Emissions

As explained in the subsection, *Methodology*, the emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. Detailed emissions calculations including a complete list of construction equipment, construction phasing, and other assumptions are provided in Appendix B. Construction is anticipated to commence in the first quarter of 2023 and is expected to take approximately 34 months to complete. The construction schedule for Building 1 and Building 2 were separated assuming Building 1 begins in the first quarter of 2023 and is completed in the fourth quarter of 2024 and Building 2 begins in the third quarter of 2023 and ends in the fourth quarter of 2025. Project operations are expected to commence in 2026. Results of the Project's construction related GHG emissions calculations are presented in **Table 4.6-10**, *Project Construction GHG Emissions*. Although construction related GHGs are one-time emissions, any assessment of Project emissions should include construction emissions. The SCAQMD recommends that a project's construction-related GHG emissions be amortized over the project's 30-year lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. The Project's estimated construction GHG emissions have been amortized over a 30-year period in accordance with SCAQMD guidance.

TABLE 4.6-10
PROJECT CONSTRUCTION GHG EMISSIONS

Year	CO_2e (Metric Tons)[a]
2023	3,414
2024	3,313
2025	1,671
Construction Office (MTCO2e/year)	11
Construction Water Energy (total for construction duration)	57
Total Construction Emissions	8,466
Amortized Construction Emissions (30-years)	282

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA, 2022.

It is estimated that the Project would export approximately 95,000 cubic yards (CY) of grading (cut) in Phase 1 and 195,000 CY of grading (cut) from Phase 2, all of which would be exported from the Project Site. Emissions from haul trucks and continuous pour concrete trucks were estimated outside of CalEEMod using EMFAC2021 emission factors for heavy-duty trucks. It should be noted that the GHG emissions shown in Table 4.6-10 are based on construction equipment operating continuously throughout the workday. In reality, construction equipment tends to operate periodically or cyclically throughout the workday. Therefore, the GHG emissions shown reflect a conservative estimate.

Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. As recommended by the SCAQMD, construction-related GHG emissions were amortized over a 30-year project lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are added to the annualized operational GHG emissions.

Operational Emissions

The Project's annual GHG emissions included emissions from operations and construction calculated by CalEEMod and EMFAC for mobile source emissions. As previously described, construction GHG emissions for the entire construction period were amortized over 30 years. The Project must comply with the portions of the City of Culver City's Green Building Code and mandatory Green Building Program as well as the City of Los Angeles's Green New Deal/Sustainable City pLAn and Green Building Code as applicable to new developments. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. As explained above, the Project's mobile source emission calculations associated with the Project are calculated using the VMT from the VMT Calculator, which is attached in Appendix B, prepared for the Project.

The Project would implement Project Design Feature GHG-PDF-1 (Green Building Features), which include the Project buildings achieving the USGBC LEED Gold Certification to improve building energy efficiency above regulatory requirements. LEED Gold Certification requires documenting achievement of the rating system requirements and the required credits after the completion of construction. Projects may achieve credits in a variety of categories, including categories that are relevant to energy such as Location and Transportation, Water Efficiency, and Energy and Atmosphere. It not yet known which specific credits in each of the LEED categories the Project will achieve; therefore, it is not possible at this time to accurately quantify specific amounts of energy and VMT reduction and associated GHG emissions reductions the Project would achieve from LEED Gold Certification above regulatory requirements. Therefore, LEED Gold Certification is not quantitatively accounted for in this analysis.

Maximum unmitigated, annual net GHG emissions resulting from on road mobile sources, area sources (landscape maintenance equipment), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste were calculated for the Project buildout year (2026). The Project's total and net GHG emissions from operation of the Project are shown in **Table 4.6-11,** *Estimated Annualized Unmitigated Project GHG Emissions.*

TABLE 4.6-11
ESTIMATED ANNUALIZED UNMITIGATED PROJECT GHG EMISSIONS

	Operational Emissions CO_2e (Metric Tons per Year)[a]	
Emissions Sources	**Proposed Project**	**Project Without GHG Reduction Characteristics, Features, and Measures**
Opening Operational Year (2026)		
Energy (Electricity)	2,406	2,910
Energy (Natural Gas)	397	397
Electric Vehicle Charging	41	49
Mobile Sources	5,050	6,326
Solid Waste	985	985
Water	99	115
Stationary Source	5	5
Area	<1	<1
Amortized Construction Emissions	282	282
Total Project Emissions	**9,264**	**11,068**
Existing Emissions	2,045	2,045
Net Emissions	7,218	9,023
Emissions Reduction	1,805	—
Percent Reduction	**16.3%**	**—**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA, 2022.

Physical and operational Project characteristics for which sufficient data are available to quantify the reductions from building energy and resource consumption (see Section 4.14, *Utilities and Service Systems*, for energy demand and water usage) have been included in the quantitative analysis, and include but are not limited to the following: water reduction and efficiency features such as: installation of energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping, reduced building energy usage consistent with 2019 Title 24 Building Energy Efficiency Standards. The Applicant would pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code in order to achieve compliance with the City of Culver City's solar photovoltaic requirement. There is no quantification of the TDM Program as it is voluntary and is not included in the analysis in Section 4.12, *Transportation*.

While other methodologies for calculating Project GHG reduction efficiencies exist, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures and is presented here for informational purposes only, in order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by GHG reduction plans and policies. This comparison is provided to evaluate the Project's efficiency with respect to GHG emissions but is not the threshold of significance used for impact analysis. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures would incorporate the same land uses and building square footage as the Project. Furthermore, this analysis is consistent with the current regulatory policies and GHG quantification methods. As shown in Table 4.6-11, the Project would achieve a 65 percent diversion rate for solid waste, similar to the Project without Reduction Features scenario, as this diversion rate is conservative for the County of Los Angeles. Water conservation measures from Project Design Feature WATER-PDF-1 are accounted for in the Project GHG emissions, but not in the Project without Reduction Features scenario. Emissions from mobile sources are reduced for the Project compared to the unadjusted trips and VMT, derived from the City of Los Angeles VMT Calculator in Appendix B, used in the Project without Reduction Features scenario. Reductions to emissions from energy and EV charging are due to the application of carbon intensity factors using SB 100 versus the Climate Change Scoping Plan NAT scenario.

The quantification of GHG emissions for the Project without implementation of GHG reduction characteristics, features, and measures scenario is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the Climate Change Scoping Plan. (For complete list of assumptions refer to Appendix B of this Draft EIR).

Emissions reductions from the Project's two highest GHG-emitting sources, mobile and electricity, would occur over the next decade due to state mandates discussed above, and beyond, ensuring that the Project's total GHG emissions would be further reduced. Emissions from electricity would decline as utility providers, including SCE and LADWP, meet their RPS obligations consistent with SB 350 and SB 100, which would achieve additional reductions in emissions from electricity demand. Although the actual reduction will depend on the mix of fossil fuels that the utility providers will replace with renewables and the relative CO_2 intensities of those fossil fuels. Project

emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017–2025 Pavley Phase II standards. It should be noted that Project-related GHG emissions presented above are provided for informational purposes as there is no numeric threshold applicable to the Project,. The Project's evaluation of consistency with the relevant plans to reduce GHG emissions is the basis for determining the significance of the Project's GHG-related impacts on the environment.

Mitigation Measures

Impacts regarding GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions and; additionally, climate change impacts related to GHG emissions do not necessarily occur in the same area as the project is located. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[125] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. Given that the Project would generate GHG emissions that would not conflict with applicable reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than significant.

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no

[125] California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 39.

significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 40 percent below 1990 levels by 2030, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, City of Culver City, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3),[126] the City of Culver City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project would not conflict with the applicable regulatory plans and policies to reduce GHG emissions: Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, Culver City's Green Building Program, City of Los Angeles's Green New Deal/Sustainable City pLAn, and the Los Angeles Green Building Code.

As described above, the CARB's Climate Change Scoping Plan illustrates that implementation of the Project's regulatory requirements and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from the Project without implementation of GHG reduction characteristics, features, and measures scenario and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in CARB's Climate Change Scoping Plan for the implementation of AB 32.

The Project would be consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to comply with the City of Culver City and City of Los Angeles's municipal codes and the CALGreen Building Code.

As part of SCAG's 2020–2045 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2035 GHG emission reduction targets established by CARB. As discussed previously, the Project Site's characteristics demonstrate that the Project's VMT would be reduced

[126] As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."

based on its location near public transit, provision of bicycling/pedestrian access and facilities, and TDM Program, as required by Project Design Feature TRAF-PDF-2.

The Project also would comply with the City of Los Angeles's Green New Deal/Sustainable City pLAn, as discussed earlier, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project would also comply with the City of Culver City Green Building Program and Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, and increasing renewable energy generation. The Project's regulatory requirements and project design features (refer to Project Design Feature GHG-PDF-1) provided above and throughout this Draft EIR would advance these objectives. Furthermore, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives.

As discussed above, the Project would not conflict with the applicable GHG reduction plans and policies. The comparison of the Project's emissions to a scenario without GHG reduction features demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program would backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program would be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program would ensure that the GHG reduction targets of AB 32 and SB 32 are met.

The 2017 Scoping Plan demonstrates that the State's existing and proposed regulatory framework would allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030. Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve the 2050 goal, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given that the Project would generate GHG emissions consistent with applicable reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would not be cumulatively considerable, and impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding GHG emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts regarding GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.7 Hazards and Hazardous Materials

4.7.1 Introduction

This section analyzes potential impacts associated with hazards and hazardous materials that could occur during construction and operation of the Project. Hazards and hazardous materials are generally defined as any material that is flammable, combustible, corrosive, caustic, explosive, toxic, poison, or an irritant that has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Hazardous materials are defined, strictly regulated, and closely monitored under a series of regulations administered by an array of government agencies as described in this section. The analysis is based largely on the *Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California*, dated October 18, 2021 (Phase I ESA), provided in Appendix H of this Draft EIR.

4.7.2 Environmental Setting

Regulatory Framework

Several plans, regulations, and programs include policies, requirements, and guidelines regarding Hazards and Hazardous Materials at the federal, state, regional, and Culver City and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Resource Conservation and Recovery Act
- Emergency Planning and Community Right-to-Know Act
- Occupational Safety and Health Act of 1970
- Toxic Substances Control Act
- Hazardous Materials Transportation Act
- Research and Special Programs Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- Other Hazardous Materials Regulations
- State Policies and Regulations
- California Hazardous Materials Release Response Plans and Inventory Law of 1985
- Hazardous Waste and Substances Sites
- Hazardous Waste Control Law
- License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.
- Underground Storage Tanks Program
- Aboveground Petroleum Storage Act
- Lead Based Paint Regulations

- California Division of Occupational Safety and Health
- The Safe Drinking Water and Toxic Enforcement Act
- California Water Code
- Government Code Section 3229, Division
- California Fire Code
- Uniform Fire Code
- California Governor's Office of Emergency Services
- Emergency Managed Mutual Aid System
- Los Angeles Regional Water Quality Control Board's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering
- Waste Discharge Requirements
- South Coast Air Quality Management District Rule 1113
- South Coast Air Quality Management District Rule 1166
- South Coast Air Quality Management District Rule 1403
- Los Angeles County Operational Area Emergency Response Plan
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan
- Hazardous Materials Disclosure Reporting Program
- Culver City Municipal Code (Stormwater and Urban Runoff Pollution Control)
- Culver City Fire Code
- Los Angeles General Plan – Conservation Element
- Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)
- Los Angeles Fire Code
- Los Angeles Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
- Los Angeles Emergency Management Department, Emergency Operations Organization, and Emergency Operation Center

Federal

Resource Conservation and Recovery Act

The federal Resource Conservation and Recovery Act (RCRA) (42 United States Code [U.S.C.] secs. 6901–6992k), which amended and revised the Solid Waste Disposal Act, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own programs for the regulation of hazardous waste as long as they are at least as stringent as RCRA's.

Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for UST installations installed after December 22, 1988, as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies.[1] It also requires industry to report on the storage, use, and releases of hazardous substances to federal, state, and local governments. EPCRA requires state and local governments, and Indian tribes to use this information to prepare for and protect their communities from potential risks.

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right–to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in the CCR, Title 8, or 8 CCR generally and in the Labor Code secs. 6300–6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

Toxic Substances Control Act

In 1976, the federal Toxic Substances Control Act (15 U.S. Code (U.S.C.) Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose hazards. The Toxic Substances Control Act is enforced by the U.S. Environmental Protection Agency (USEPA) through inspections of places in which asbestos-containing materials (ACM) are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators. The Toxic Substances Control Act establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use and disposal restrictions or labeling of products. Polychlorinated Biphenyls (PCB)s are hazardous materials regulated by the USEPA under the Toxic Substances Control Act (TSCA). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. PCBs were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, and electrical transformers, among others. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by

[1] United States Environmental Protection Agency (USEPA), Emergency Planning and Community Right-to-Know Act Fact Sheet, Fall 2020.

TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the HWCL, which lists PCBs as hazardous waste.

Under the TSCA, the USEPA has enacted strict requirements on the use, handling, and disposal of ACM. These regulations include the phasing out of friable asbestos and ACM in new construction materials began in 1979. In 1989, the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (USDOT) prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S.C. Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of the HMTA. The Pipeline and Hazardous Materials Safety Administration (PHMSA),[2] formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100–180.[3] Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce."

Research and Special Programs Administration

RSPA regulations cover definition and classification of hazardous materials, communication of hazards to workers and the public, packaging and labeling requirements, operational rules for shippers, and training. They apply to interstate, intrastate, and foreign commerce by air, rail, ships, and motor vehicles, and also cover hazardous waste shipments. The RSPA's Federal Highway Administration (FHWA) is responsible for highway routing of hazardous materials and highway safety permits. The U.S. Coast Guard regulates bulk transport by vessel. The hazardous material regulations include emergency response provisions, including incident reporting requirements. Reports of major incidents go to the National Response Center, which in turn is linked with

2 United States Department of Transportation (USDOT), Federal Hazmat Law, September 2021.

3 Code of Federal Regulations (CFR), Title 49, Parts 100–180, Transportation, revised as of October 1, 2010.

CHEMTREC, a service of the chemical manufacturing industry that provides details on most chemicals shipped in the United States.

Federal Emergency Management Act

The Federal Emergency Management Act (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident.[4] FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 U.S.C. Section5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Section 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, Tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, other applicable federal laws that also address hazardous materials. These include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act

[4] Federal Emergency Management Act (FEMA), History of FEMA, https://www.fema.gov/about/history. Accessed July 12, 2022.

- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

State

State Policies and Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management are the Department of Toxic and Substance Control (DTSC) and the Los Angeles Regional Water Quality Control Board (LARWQCB). Other State agencies involved in hazardous materials management include California OSHA (Cal/OSHA) and the State Office of Emergency Services (Cal OES).

Authority for the statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in underground storage tanks (USTs) is regulated by the State Water Resources Control Board (SWRCB), which delegates authority to the Regional Water Quality Control Board (RWQCB) on the regional level, and typically to the local fire department on the local level.

The Cal/OSHA program is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Cal OES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide State and local emergency managers with emergency coordination and technical assistance.

California Hazardous Materials Release Response Plans and Inventory Law of 1985

The California Hazardous Materials Release Response Plans and Inventory Law of 1985, also referred to as the Business Plan Act, requires preparation of Hazardous Materials Business Plans (HMBPs) and disclosure of hazardous materials inventories, including an inventory of hazardous

materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California HSC, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several State agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and Caltrans enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

Hazardous Waste and Substances Sites

Government Code Section 65962.5, amended in 1992, requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese) List, which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document used by the State, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database (Health and Safety Codes 25220, 25242, 25356, and 116395);
2. List of open and active leaking underground storage tank (LUST) Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (Health and Safety Code 25295);
3. List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051);
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code Sections 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the DTSC.

Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) empowers the Department of Toxic Substances Control (DTSC) to administer the State's hazardous waste program and implement the federal program in California. CCR Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

The California Department of Transportation (Caltrans) regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

Underground Storage Tanks Program

The State regulates Underground Storage Tanks (USTs) through a program pursuant to HSC, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/ or monitoring of USTs for leakage, UST closure requirements, release reporting/ corrective action, and enforcement. Oversight of the statewide UST program is assigned to the State Water Resources Control Board (SWRCB), which has delegated authority to the Regional Water Quality Control Boards (RWQCB) and typically on the local level, to fire departments. The Los Angeles Fire Department and the Culver City Fire Department administer and enforce federal and State laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by fire department inspectors. If a release affecting groundwater is documented, the project file is transferred to the appropriate RWQCB for oversight.

Aboveground Petroleum Storage Act

In 1989, California established the Aboveground Petroleum Storage Act instituting a regulatory program covering aboveground storage tanks (ASTs) containing specified petroleum products (Health and Safety Code Sections 25270–25270.13). The Aboveground Petroleum Storage Act applies to facilities with storage capacities of 10,000 gallons or more or are subject to oil pollution prevention and response requirements under 40 CFR Part 112. Under the Aboveground Petroleum Storage Act, each owner or operator of a regulated AST facility must file a storage statement biennially with the SWRCB disclosing the name and address of the AST facility; the contact person for the facility; and the location, size, age, and contents of each AST that exceeds 10,000 gallons in capacity and that holds materials that are at least five percent petroleum. In addition, each owner or operator of a regulated AST must prepare a Spill Prevention Control and Countermeasure Plan in accordance with federal and State requirements (40 CFR Part 112 and Health and Safety Code Section 25270.5[c]). The responsibility for inspecting ASTs and ensuring that Spill Prevention Control and Countermeasure Plans have been prepared lies with the RWQCBs.

Asbestos-Containing Materials

State-level agencies, in conjunction with the USEPA and OSHA, regulate removal, abatement, and transport procedures for asbestos-containing materials (ACM). ACM is regulated under state regulations in California Code of Regulations (CCR), Title 8, Division 1, Chapter 4, Article 4, Sections 1529 and 5208; the South Coast Air Quality Management District has local regulations, as discussed further below. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for

employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Lead Based Paint Regulations

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has a one milligram per square centimeter (mg/cm2) (5,000 microgram per gram (µg/g) or 0.5% by weight) or more of lead. The US Consumer Product Safety Commission (16 CFR 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978 are much more likely to have LBP.

The demolition of buildings containing LBPs is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code.

PCB Regulations

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979, and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act, 15 U.S.C. Section 2601 et seq. (TSCA) and CCRs, Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.24. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The State of California likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for non-liquids, regional water quality control boards may exercise discretion over the classification of such wastes.

California Division of Occupational Safety and Health

Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials (8 CCR, Section 1529). Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans, and provides specific regulations to limit exposure of construction workers to lead. OSHA regulations apply to this Project because contractors will be handling hazardous materials, and therefore, will be required to comply with OSHA's handling and use requirements that would increase worker safety and reduce the possibility of spills and to prepare an emergency response plan to respond to accidental spills.

The Safe Drinking Water and Toxic Enforcement Act

The Safe Drinking Water and Toxic Enforcement Act (Health Safety Code, Section 25249.5, et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans. It also restricts the discharges of listed chemicals into known drinking water sources above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

California Water Code

The California Water Code (CWC) authorizes the SWRCB to implement provisions of the Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. With regard to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the underground parking structure and building foundations. Under the CWC, discharges of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited unless conducted in compliance with a Waste Discharge Requirement (WDR) permit. In addition to the CWC, these permits implement and are in compliance with the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The dewatering program is implemented on the regional scale by the various Regional Water Quality Control Board (RWQCB), as discussed further below.

Government Code Section 3229, Division

In compliance with Section 3229, Division 3 of the California Public Resources Code, before commencing any work to abandon any oil or natural gas well, the owner or operator shall request approval from the California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources, via a written notice of intention to abandon the well.

California Fire Code

The 2019 California Fire Code (CFC), written by the California Building Standards Commission, is based on the 2018 International Fire Code. The International Fire Code (IFC) is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The CFC, Chapter 9 of Title 24 of the California Code of Regulations (CCR), was created by the California Building Standards Commission based on the International Fire code and is updated every 3 years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

Uniform Fire Code

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to Health and Safety Code Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill.

California Governor's Office of Emergency Services (Cal OES)

In 2009, the State passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local governments request assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the State's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead State agency for emergency management in the State. It also serves as the lead agency for mobilizing the State's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with the local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

Emergency Managed Mutual Aid System

Cal OES developed the Emergency Managed Mutual Aid (EMMA) System in response to the 1994 Northridge Earthquake. The EMMA System coordinates emergency response and recovery efforts along the coastal, inland, and southern regions of California. The purpose of EMMA is to provide emergency management personnel and technical specialists to afflicted jurisdictions in support of disaster operations during emergency events. Objectives of the EMMA Plan is to provide a system to coordinate and mobilize assigned personnel, formal requests, assignment, training and demobilization of assigned personnel; establish structure to maintain the EMMA Plan and its procedures; provide the coordination of training for EMMA resources, including SEMS training, coursework, exercises, and disaster response procedures; and to promote professionalism in emergency management and response. The EMMA Plan was updated in November 2012 and supersedes the 1997 EMMA Plan and November 2001 EMMA Guidance.

Regional

Los Angeles Regional Quality Control Board's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering

The California Water Code (CWC) authorizes the SWRCB and its local regional water quality control boards (RWQCBs) to implement provisions of the Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. With regard to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the underground parking structure and building foundations. Under the CWC, discharges of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited unless conducted in compliance with a WDR permit. In addition to the CWC, these permits implement and are in compliance with the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. In accordance with these legal requirements, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB)'s *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, pursuant to adopted Order No. R4-2013-0095, or any other appropriate WDR permit identified by the LARWQCB.[5] Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards. If, for example, extracted groundwater contains Total Petroleum Hydrocarbons (TPH) or other petroleum breakdown compounds in concentrations exceeding water quality standards, compliance with legal requirements would mandate treatment to meet published State water quality standards prior to discharge into a storm drain system.

Waste Discharge Requirements

Effective on December 28, 2012, the LARWQCB adopted Order No. R4-2012-0175, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges into the Coastal Watersheds of Los Angeles County. The permit establishes new performance criteria for new development and redevelopment projects in the coastal watersheds of Los Angeles County (with the exception of the city of Long Beach). Storm water and non-storm water discharges consist of surface runoff generated from various land uses, which are conveyed via the municipal separate storm sewer system and ultimately discharged into surface waters throughout the region ("storm water" discharges are those that originate from precipitation events, while "non-storm water" discharges are all those that are transmitted through an MS4 Storm Water Permit and originate from precipitation events). Discharges of stormwater and non-storm water from the MS4s, or storm drain systems, in the Coastal Watersheds of Los Angeles County convey pollutants to surface waters throughout the Los Angeles Region. Non-storm water discharges through an MS4 in the Los Angeles Region are prohibited unless authorized under an individual or general NPDES permit; these discharges are regulated by the Los Angeles County NPDES Permit, issued pursuant to CWA Section 402. Coverage under a general NPDES

[5] Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

permit such as the Los Angeles County permit can be achieved through development and implementation of a project-specific Stormwater Pollution Prevention Plan (SWPPP).

South Coast Air Quality Management District Rule 1113

South Coast Air Quality Management District (SCAQMD) Rule 1113, Architectural Coating, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

South Coast Air Quality Management District Rule 1166

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: (1) The excavation of an underground storage tank or piping which has stored VOCs; (2) The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; (3) The handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; and (4) The treatment of VOC-contaminated soil at a facility. This rule sets requirements to control the emission of VOCs from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

South Coast Air Quality Management District Rule 1403

SCAQMD Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean up procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with ACM, asbestos storage facilities, and waste disposal sites.

Los Angeles County Operational Area Emergency Response Plan

The County of Los Angeles developed the Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the ERP is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid, and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the ALUC and for coordinating the airport planning of public agencies within the County. ALUC coordinates planning for the areas surrounding public use airports. The Los Angeles County Airport Land Use Plan (dually titled Comprehensive Land Use Plan) provides for the orderly expansion of Los Angeles County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating this plan, the Los Angeles County ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

Local

City of Culver City

Culver City Municipal Code (Stormwater and Urban Runoff Pollution Control)

Culver City Municipal Code, Chapter 5.05, establishes requirements for stormwater and urban runoff flow from individual properties onto streets, then through storm drains passing through the City into Ballona Creek and Marina del Rey Harbor. Owners and occupants of property within the City shall implement BMPs to prevent or reduce the discharge of pollutants to the municipal stormwater system to the maximum extent practicable. Treatment and structural BMPs shall be properly operated and maintained to prevent the breeding of vectors. Stormwater runoff containing sediment, construction materials or other pollutants from the construction site and any adjacent staging, storage or parking areas shall be reduced to the maximum extent practicable.

Culver City Fire Code

At the local level, the CCFD monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the CCFD.[6] This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The CCFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC sec. 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds (i.e., a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are

[6] The CalARP program encompasses both the federal "Risk Management Program," established in the CFR, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5.

liquids, 500 pounds for solids, or 200 cubic feet for compressed gas) must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency.[7]

The CCFD also administers, enforces, and inspects applicable standards of the Fire Code, Title 19, Uniform Building Code, Culver City, and national codes concerning new construction and remodeling. As part of inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review. Businesses that handle any single hazardous material at any one time in any amount greater than or equal to 55 gallons for a liquid, 500 pounds for a solid, or 200 cubic feet for a gas, have a reportable quantity and must report the inventory to the CCFD.

The CCFD provides emergency services within Culver City, including for fire, emergency medical, technical rescue (vehicle accident response, natural disaster response, swift water rescue, confined space rescue, low and high angle rope rescue, and structural collapse rescue), and hazardous materials incidents. The CCFD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters and significant events.

Culver City Hazardous Materials Disclosure Reporting Program

Senate Bill 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) which requires the administrative consolidation of six hazardous materials and waste programs under one agency, a Certified Unified Program Agency (CUPA). The City of Culver City is a member of the Los Angeles County CUPA, which requires that every business that handles more than 55 gallons, 5 pounds, or 200 cubic feet or more of a hazardous material (as defined by the California Health & Safety Code) at any one time report their inventories of hazardous materials to the Los Angeles County Fire Department and the Culver City Fire Department (CCFD). This requirement is also applicable to quantities as low as one pound of materials classified as "extremely hazardous" (as defined by the California Health & Safety Code). Per the City's CUPA/Hazardous Materials Disclosure Reporting Program, business that meet the above hazardous materials thresholds must submit Reporting Forms manifesting the hazardous materials used, and an Emergency Plan for responding to any potential spills of these materials, to the Los Angeles County Fire Department and CCFD to be kept on file by these departments.[8]

City of Los Angeles

Los Angeles General Plan – Conservation Element

The City of Los Angeles General Plan Conservation Element (Conservation Element) adopted in 2001, contains policies related to the identification and protection of energy resources. Relevant goals, objectives, and policies of the Framework Element are provided in **Table 4.7-1**, *Relevant General Plan Conservation Element Policies*.

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7 California Health & Safety Code, Division 20, Chapter 6.95, Article 1; California Code of Regulations, Title 19, Sections 2620–2732; California Code of Regulations, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.

8 City of Culver City Fire Department, CUPA/Hazardous Materials Disclosure Reporting Program, Business Reporting Forms and Emergency Plan Packet, July 2005.

TABLE 4.7-1
RELEVANT GENERAL PLAN CONSERVATION ELEMENT POLICIES

Policy	Policy Text
Policy 1	Continue to encourage energy conservation and petroleum product reuse.
Policy 3	Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements.

SOURCE: City of Los Angeles, 1996 and 2001

Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)

Los Angeles Municipal Code (LAMC), Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The required methane mitigation systems are based on the site Design Level, with more involved mitigation systems required at the higher Site Design Levels. The required methane mitigation systems are designed so that when properly implemented, they reduce methane-related risks to a less than significant level.

Los Angeles Fire Code

At the local level, the LAFD monitors the storage of hazardous materials in the City of Los Angeles for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD.[9] This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC sec. 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds (i.e., a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are liquids, 500 pounds for solids, or 200 cubic feet for compressed gas) must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency.[10]

[9] The CalARP program encompasses both the federal "Risk Management Program," established in the CFR, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5.

[10] California Health & Safety Code, Division 20, Chapter 6.95, Article 1; California Code of Regulations, Title 19, Sections 2620–2732; California Code of Regulations, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.

The LAFD also administers the Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing applicable standards of the Fire Code, Title 19, Uniform Building Code, City of Los Angeles, and national codes concerning new construction and remodeling. As part of the Fire Life Safety Plan Check and Fire Life Safety Inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review.

Section 91.7109.2 of the LAMC requires LAFD notification when an abandoned oil well is encountered during construction activities and requires that any abandoned oil well not in compliance with existing regulations be re-abandoned in accordance with applicable rules and regulations of the California Geologic Energy Management Division (CalGEM; previously the California Division of Oil, Gas, and Geothermal Resources).

Los Angeles Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), codified in California Health and Safety Code Sections 25404 et seq., requires the administrative consolidation of six hazardous materials and waste programs under one agency, a Certified Unified Program Agency (CUPA). The following programs are consolidated under the unified program:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures [SPCC] requirements)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As the CUPA for County of Los Angeles, the Los Angeles County Health Department Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, Los Angeles County has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

A Participating Agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. The Los Angeles County Health Department, Environmental Health Division has designated the Los Angeles Fire Department (LAFD) as a Participating Agency. The LAFD monitors the storage of hazardous materials in the City of Los Angeles for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in California Health and Safety Code Chapter 6.95 are required to file an Accidental Risk

Prevention Program with LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. LAFD also has the authority to administer and enforce federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD inspectors.

Los Angeles Emergency Management Department, Emergency Operations Organization, and Emergency Operation Center

The City of Los Angeles Emergency Management Department (EMD) consists of four divisions and two units including Administrative Services Division, Communications Division, Community Emergency Management Division, Operations Division, Planning Unit, and Training Exercise Unit. The EMD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters and significant events. The Emergency Operations Organization (EOO) is the operational department responsible for the City of Los Angeles' emergency preparations (planning, training, and mitigation), and response and recovery operations. The EOO centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The Emergency Operation Center (EOC) is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the city that require involvement by multiple City departments.

Existing Conditions

Existing Site Improvements

As discussed in Section 2.3, *Existing Conditions*, the Project Site consists of two adjacent parcels with one in Culver City and one in the City of Los Angeles. The Culver City Parcel is currently developed with two warehouse buildings and surface parking. The Los Angeles Parcel is currently developed with a single warehouse building and enclosed vehicular parking. Although currently without tenants, the most recent use was as warehouses, a home furnishings store, clothing retail store, miscellaneous storage, and as offices for an advertising company. The surrounding area is densely developed with urban land uses.

Potentially Hazardous Materials/Conditions on the Project Site

A Phase I ESA and a subsurface sampling investigation was conducted to identify potential hazardous materials and hazardous waste issues at the Project Site and at nearby sites with the potential to affect the Project Site.[11] The results summarized below are from the Phase I ESA unless otherwise cited.

[11] EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021. Provided as Appendix I of this Draft EIR.

Hazardous Materials in Existing Structures

As discussed in Section 4.3, *Cultural Resources*, the buildings on the Project Site date to 1951 and 1954.

Asbestos-Containing Materials

Asbestos-containing materials (ACMs) have historically been present in a wide variety of building materials. The use of ACMs as building materials was substantially curtailed by 1981 with the adoption of regulatory controls on their use beginning in the late 1970s. Given that the existing on-site buildings were constructed prior to 1981, ACMs may be present in some on-site buildings. The Phase I ESA noted ACM abatement and off-site disposal in 1992 and possibly in 2018 for the structures at 8886 and 8888 Venice Boulevard and 8829 National Boulevard. However, the records did not indicate whether all ACM has been removed from these structures. The structures at 8833 National Boulevard did not have records of ACM removal.

Lead-Based Paint

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm^2 (or 5,000 micrograms per gram (ug/g) or 0.5 percent by weight) or more of lead. If released into the environment, these materials could pose a significant hazard to construction workers or the public. Given that the existing on-site buildings were constructed prior to 1981, LBP may be present in some on-site buildings. No records regarding LBP were identified for any of the structures.

Polychlorinated Biphenyls

PCBs were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. These substances have been listed as carcinogens by USEPA. PCBs were banned from general commercial use in 1977. PCBs are regulated by the USEPA under the Toxic Substances Control Act (TSCA). The TSCA contains provisions controlling the continued use and disposal of existing PCB-containing equipment. Items which may potentially impact the Project Site with PCBs include electrical capacitors and transformers, fluorescent light ballasts, hydraulic oils used in hydraulic lifts and elevators, vacuum pumps, gas turbines, and other petroleum products manufactured prior to the 1977 ban. The Phase I ESA observed a pad mounted transformer on the Project Site. The transformer appeared to be in good condition without any signs of leaking. PCBs may also be present at regulated levels in building materials, such as caulks and sealants, given the age of construction of the Project Site buildings (1950s).

Hazardous Materials Use

On-Site

As part of the Phase I ESA, the Project Site was visually inspected and the owner interviewed regarding chemical use at the Project Site. At the time of the site reconnaissance of the Culver City portion of the Project Site in February 2021, the buildings were primarily vacant and not in active use by tenants. The 8771 Washington Boulevard building was being used for miscellaneous materials/furniture storage by the property owner. The 8825 National Boulevard building was vacant and undergoing interior renovation at the time of the visit.

At the time of the site reconnaissance of the of the Los Angeles portion of the Project Site in September 2021, the buildings were primarily vacant and not in active use by tenants. The 8876 Venice Boulevard building was vacant and undergoing interior renovation (e.g., floor trenching and grade beam and utility installations) at the time of the visit.

The property owner stated that none of the previous tenants were engaged in manufacturing or industrial operations. No hazardous materials or petroleum products were observed other than typical building construction-related materials (e.g., dry wall compounds and paints stored in the 8888 Venice Boulevard building in a temporary contractor staging/office area).

The Phase I ESA identified past uses of the Project Site that included the manufacturing of restaurant equipment, and a sheet metal shop and fabrication shop. Chemicals such as petroleum products, paints and thinners, and cleaning solvents, may have been used and stored on the Project Site during these past uses.

Off-Site

The Phase I ESA reviewed records for nearby off-site properties that may have the potential to affect the Project Site. The former TWS Products Supply site at 8801 Washington Boulevard is located south and across National Boulevard from the Project Site. The TWS Product Supply is a former gasoline service station site designated by the regulatory agency as a closed Leaking Underground Storage Tank (LUST) site. The LUST status means that the TWS site was investigated and remediated for fuel that leaked from the fuel tanks. The closed status means that the TWS site was cleaned up to a level that the overseeing regulatory agency, the LARWQCB, concluded no longer posed a risk to people and the environment in surrounding properties. In February 2017, the LARWQCB indicated that the TWS case met the requirement of the Low-Threat UST Closure Policy and issued Case Closure and no further action. However, this also means that residual levels of fuel components are likely remaining in soil and groundwater at the TWS site and possibly in downgradient areas. The Project Site is located downgradient and within about 200 feet of the TWS site. The Phase I ESA noted that elevated concentrations of components of gasoline (benzene, toluene, ethylbenzene, and xylenes (BTEX), and naphthalene have been detected in groundwater at the former TWS site and have reportedly migrated generally to the northeast across National Boulevard to the Project Site.

Hazardous Materials in Soil Vapor, Soil, and Groundwater

To evaluate current conditions at the Project Site, a soil vapor, indoor air, and groundwater sampling investigation was conducted on the Project Site that included the collection and analysis of 16 subsurface soil vapor samples, three groundwater samples, and 12 indoor air samples, and five outdoor air samples at various locations.

The soil vapor sampling results were compared to Department of Toxic Substances Control (DTSC) and USEPA vapor intrusion screening levels for commercial land use. Perchloroethene (PCE; also referred to as tetrachloroethene) was detected in sub-slab soil vapor in the northern portion of the Project Site at concentrations above its screening level for commercial land use. Several other volatile organic compounds (VOCs) were also detected but at concentrations below their screening levels for commercial land use. Follow-up indoor air sampling conducted within the Venice Boulevard buildings did not identify PCE or other VOCs at concentrations above their respective

screening levels for commercial land use, although PCE was detected at measurable concentrations in indoor air samples.

The groundwater sampling results were compared to primary drinking water standards (also referred to as maximum contaminant levels (MCLs). Benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above MCLs. So, dewatering effluent may require special handing and/or treatment prior to disposal.

The indoor and outdoor air samples were compared to current DTSC and USEPA screening levels. PCE was detected in five indoor air samples but all at concentrations below its screening level for commercial land use. PCE was not detected in any of the outdoor air samples, suggesting that the detected PCE in indoor air may be from the subsurface or an indoor source. Benzene was detected in all of the indoor air samples at concentrations above its screening level for commercial land use. However, benzene was also detected in all of the outdoor samples at similar concentrations, indicating the benzene is likely from the outdoor ambient air in the local area.

Proximity to Schools

School children are sensitive to hazardous materials emissions and schools are thus considered a sensitive land use. The following schools are located within 0.25 miles of the Project Site:

- Turning Point School is located at 8780 National Boulevard about 0.15 miles southeast of the Project Site.
- Park Century School is located at 3939 Landmark Street about 0.15 miles south of the Project Site.

Proximity to Airports

There are no airports within two miles of the Project Site. The nearest airport is the Santa Monica Airport, located 3.5 miles to the west.

Methane, Oil, and Gas

The Project Site is not located within a designated methane zone.[12] Therefore, no constraints associated with methane or other subsurface gases are expected to be encountered at the Project Site.

Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. Radon sampling was not conducted as part of the subsurface sampling investigation. However, the Phase I ESA determined that the Project Site is located within U.S. Radon Zone 2, which has radon levels of greater than 2 and less than 4 picocuries per liter, and within the California Geological Survey (CGS) Radon Potential Zone designation "Low." The radon level for the Project Site is below the USEPA recommended radon action level for indoor air of 4.0 picocuries per liter.

[12] Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

Adopted Emergency Response or Evacuation Plan

The Project Site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. The Project Site is bordered by Venice (six lanes), National (four lanes), and Washington (four lanes) Boulevards, with site access from National Boulevard, along with a driveway on Washington Boulevard that can be used to access 8771 Washington Boulevard.

Disaster Routes are freeway, highway, or arterial routes pre-identified for use during times of crisis.[13] These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. Venice Boulevard is a designated Secondary Disaster Route. However, the County of Los Angeles states that Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are different. An evacuation route is used to move the affected population out of an impacted area. Such routes are designated at the time of the emergency by emergency personnel.

4.7.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

- **HAZ-1:** Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials;
- **HAZ-2:** 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;
- **HAZ-3:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- **HAZ-4:** Be located on a site 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;
- **HAZ-5:** 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, results in a safety hazard or excessive noise for people residing or working in the project area;
- **HAZ-6:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- **HAZ-7:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

[13] County of Los Angeles Department of Public Works, Disaster Routes, Los Angeles County Operational Area, https://dpw.lacounty.gov/dsg/DisasterRoutes/. Accessed July 12, 2022.

Methodology

The evaluation of hazardous conditions and materials associated with construction and/or operation of the Project is based primarily on the Phase I ESA, dated October 18, 2021, and provided in Appendix H of this Draft EIR.

The Phase I ESA was conducted in conformance with the requirements of ASTM E 1527-13, and All Appropriate Inquiry (AAI) as defined by the USEPA in Title 40 of the CFR, Part 312. The purpose of the Phase I ESA was to identify adverse environmental conditions including Recognized, Controlled, and Historical Environmental Conditions (RECs, CRECs, HRECs) of the Project Site. The Phase I ESA included the results of a visual reconnaissance of the Project Site, interviews with key individuals, and review of reasonably ascertainable documents. See the Phase I ESA for additional discussion of the analysis methodology.

Based on the results of the Phase I ESA, a soil vapor, indoor air, and groundwater sampling investigation was conducted to evaluate the potential impacts to the Project Site associated with the identified and potential RECs. The investigation included the collection and analysis of 16 soil vapor samples, three groundwater samples, 12 indoor air samples, and five outdoor air samples.

Project Design Features

No specific project design features are proposed with regard to hazards and hazardous materials. However, as discussed in Section 4.12, *Transportation,* of this Draft EIR, pursuant to Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan that would include measures that would serve to reduce or avoid potential impacts associated with hazards and hazardous materials and has been accounted for in the impact analysis.

Analysis of Project Impacts

Threshold HAZ-1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold HAZ-2: 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.

Impact Analysis

Demolition and Excavation

The Project includes the demolition and removal of the existing site structures. As discussed above in the *Existing Conditions* subsection, existing on-site buildings may have ACM, LBP, and/or PCBs in some building materials. Testing of suspect building materials for ACM or LBP would be conducted in accordance with regulatory requirements, including SCAQMD Rule 1403 and CCR Title 8, Section 1532.1. In the event that ACM and/or LBP are discovered, their removal would be subject to specific and detailed SCAQMD and Cal/OSHA requirements to ensure the proper

training, containment, handling, notification, and disposal of these materials by licensed ACM and LBP abatement contractors. PCB-containing equipment (e.g., transformers) and/or materials (e.g., sealants, caulking) would be removed in compliance with CCR Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.24. In addition, Cal/OSHA regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during construction under Title 8, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk, exposure limits for such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance. Remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences would reduce impacts to less than significant.

The Project includes the excavation of soil to construct three levels of underground parking garages under each building. As discussed above in the *Existing Conditions* subsection, soil vapor, groundwater, indoor air, and outdoor air samples were collected and analyzed for chemicals of potential concern identified for the Phase I ESA. Testing revealed the presence of PCE in sub-slab soil vapor samples in the northern portion of the Project Site (beneath Venice Boulevard buildings) at concentrations above its vapor intrusion screening level for commercial land use. Follow-up indoor air sampling did not identify PCE or other VOCs at concentrations above their respective screening levels for commercial land use, although PCE was detected at measurable concentrations in indoor air samples. The presence of PCE in soil vapor has the potential to exceed environmental screening levels, but is unlikely to exceed the multiple orders of magnitude higher OSHA construction worker respiratory standards. Although PCE was not detected at concentrations above its indoor air screening level, PCE was detected above detection limits and only a limited number of samples were collected as part of the screening-level soil vapor survey; higher concentrations of PCE may be present in soil vapor in areas not sampled. Based on the presence of PCE in soil vapor, this is a potentially significant impact and mitigation measures are provided below.

As previously discussed, the Project includes the excavation of fill and soil to a depth of about 50 feet, which would extend to below the groundwater table. As discussed above in the *Existing Conditions* subsection, benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above their respective MCLs. Note that these compounds were not detected in the soil vapor samples at concentrations above their respective regulatory vapor intrusion screening levels for commercial land use. However, the concentrations of benzene and naphthalene in groundwater may require special handing and/or treatment prior to disposal of dewatering effluent, depending on the acceptance criteria of the receiving disposal facility. As discussed above in the *Regulatory Framework* subsection, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the LARWQCB *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, pursuant to adopted Order No. R4-2013-0095, or any other appropriate WDR permits identified by the LARWQCB. Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards, which would reduce impacts to less than significant.

As previously discussed, fill and soil would be excavated and removed from under the two building sites to a depth of about 50 feet. The soil removed from the excavation would be reused or disposed of at an appropriate offsite location following sampling and characterization. Based on the sampling conducted to date, the soil may contain PCE, benzene, toluene, ethylbenzene, xylenes, and naphthalene at concentrations above the acceptance criteria for the receiving site or disposal facility, depending on the acceptance criteria of the receiving facility. In addition, construction workers would need to handle the contaminated materials during excavation and disposal. The handling and disposal of contaminated materials is a potentially significant impact, and mitigation measures are provided below.

Construction

During the construction phase, construction equipment and materials would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. Construction activities would be required to comply with numerous hazardous materials regulations summarized in the *Regulatory Framework* subsection, designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement HMBPs that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. The management of hazardous materials in accordance with all applicable regulations and standards during construction would reduce impacts to less than significant.

As discussed in Section 4.5, *Geology and Soils*, construction contractors would be required to prepare a SWPPP for construction activities in compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; establish protocols for responding immediately to spills; and describe BMPs for controlling site runoff. The management of stormwater during construction in accordance with the State Construction General Permit during construction would reduce impacts to less than significant.

In addition, the transportation of hazardous materials would be regulated by the USDOT, Caltrans, and the CHP. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In the event of a spill that releases hazardous materials, a coordinated response would occur at the federal, state, and local levels, including the Los Angeles County Fire Department, which is the local hazardous materials response team. In the event of a hazardous materials spill, the fire and police departments would be simultaneously notified and sent to the scene to respond and assess the situation. The management of hazardous materials in accordance with all applicable regulations and standards during construction would reduce impacts to less than significant.

Operation

Once constructed, the office buildings would use and store small quantities of chemicals typical in office uses, such as cleaning solutions, paints, and thinners. Few of the chemicals would be considered hazardous materials (e.g., bleach) and the anticipated volumes would be small (i.e., less than 5 gallons). Given that the quantities would be small, the routine use or an accidental spill of hazardous materials would render this impact less than significant.

Although the chemicals detected in groundwater and sub-slab soil vapor samples (i.e., PCE, benzene, toluene, ethylbenzene, xylenes, and naphthalene) were not detected in indoor air samples at concentrations above their respective indoor air screening levels for commercial use, the chemicals were detected above laboratory reporting limits; higher concentrations of the chemicals may be present in soil, soil vapor and groundwater in areas not sampled. However, the excavation of fill and soil to 50 feet below ground surface for the underground parking garages would result in the removal of all fill and soil, along with any contaminants in the fill and soil beneath the buildings, thus removing the potential sources for the PCE in soil vapor and indoor air. In addition, because the excavation for the underground parking garages would be to about 50 feet deep, below the 28.5 to 33-foot depth to groundwater, each parking garage would require the installation of a groundwater barrier, i.e., a water-proof liner, to prevent groundwater from entering the garages. The groundwater barrier would also serve to prevent intrusion of vapors from the groundwater surface into the indoor air of the structures and reduce the impact to less than significant.

Finally, the Project is not located within the limits of an oil or gas field, and is not located within the limits of a City of Los Angeles Methane Buffer Zone. The Project Site is located within U. S. EPA Radon Zone 2 where the predicted average indoor radon concentrations are between more than 2.0 and less than 4.0 pCi/L, which is below the USEPA recommended radon action level for indoor air of 4.0 picocuries per liter. Therefore, relative to oil and gas fields, methane zones, and radon, impacts would be less than significant.

Mitigation Measures

To reduce the potential impact to construction workers during the excavation and handling of contaminated materials, the Applicant shall implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2.

> **HAZ-MM-1: Health and Safety Plan.** Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition on parcels within the Project Site, the Applicant for the specific work proposed shall require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).
>
> The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. HASPs shall be submitted to Culver City and the City of Los Angeles building departments and any applicable oversight regulatory agency for review before the start of demolition and construction activities and as a condition of the grading,

construction, and/or demolition permit(s). The HASP shall include, but not be limited to, the following elements:

- Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP.
- A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals.
- Specified personal protective equipment and decontamination procedures, if needed.
- The requirement to prepare documentation showing that HASP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees).
- A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor.
- Emergency procedures, including the route to the nearest hospital.
- Procedures to follow if evidence of potential soil or groundwater contamination is encountered (such as soil staining, noxious odors, debris or buried storage containers). These procedures shall be followed in accordance with hazardous waste operations regulations and specifically include, but not be limited to, immediately stopping work in the vicinity of the unknown hazardous materials release; notifying the city within which the contamination is encountered and the regulatory agency overseeing site cleanup, if any; and retaining a qualified environmental firm to perform sampling and remediation, if warranted.

HAZ-MM-2: Soil and Groundwater Management Plan. In support of the HASP described in Mitigation Measure HAZ-MM-1, the contractor conducting excavation and disposal of fill and soil shall develop and implement a soil and groundwater management plan (SGMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity to manage contaminated materials, if encountered. The SGMP shall include the following, at a minimum:

- Site description, including the hazardous materials that may be encountered.
- Roles and responsibilities of on-site workers, supervisors, and the regulatory agency.
- Training for site workers focused on the recognition of and response to encountering hazardous materials or unknown structures, e.g., underground storage tanks (USTs).
- Notification requirements in the event of discovery of unknown structures or contamination.
- Protocols for the materials (fill, soil, and dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.
- Reporting requirement to the overseeing regulatory agency, if any contamination is found that requires agency oversight, documenting that site activities were conducted in accordance with the SGMP.

The SGMP shall be submitted to Culver City and the City of Los Angeles Building Departments for review to inform their permit approval process before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The contract specifications shall mandate full compliance with all applicable federal, state, and local regulations related to the identification, transportation, and disposal of hazardous materials.

The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction.

For work that would encounter groundwater, as part of the SGMP, contractors shall include a groundwater dewatering control and disposal plan specifying how groundwater (dewatering effluent) will be handled and disposed of in a safe, appropriate, and lawful manner. The groundwater portion of the SGMP shall include the following, at a minimum:

- The locations at which groundwater dewatering is likely to be required.
- Test methods to analyze groundwater for hazardous substances.
- Appropriate treatment and/or disposal methods.
- Discussion of discharge to a publicly owned treatment works or the stormwater system, in accordance with any regulatory requirements the treatment works may have, if this effluent disposal option is to be used.

Level of Significance after Mitigation

To ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, or the environment, the Project would be required to implement Mitigation Measure HAZ-MM-1, which requires the preparation and implementation of a site-specific HASP in accordance with federal and State OSHA regulations, and Mitigation Measure HAZ-MM-2, which requires the preparation and implementation of a SGMP prior to and during Project construction. Groundwater management is included because three levels of below grade parking would be constructed, which would encounter groundwater known to be contaminated. The implementation of these mitigation measures would reduce impacts to a less than significant level.

Threshold HAZ-3: The Project would result in a significant impact if it would emit or release hazardous substance emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Analysis

Demolition, Excavation, and Construction

As discussed in Section 4.7.2, *Environmental Setting,* in the *Proximity to Schools* subsection, two schools are located about 0.15 mile south of the Project Site. Demolition and excavation activities at the Project Site would include the transportation and off-site disposal of hazardous waste. Construction of the Project would involve the temporary use of hazardous substances in the form of paints and thinners, glues and adhesives, solvents cleaning agents, and fuels and oils, which are all commonly used in construction.

As discussed above in Impact HAZ-1/HAZ-2, demolition, excavation, and construction activities would be required to comply with applicable hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including the transportation of hazardous materials and hazardous waste on public streets. As discussed in Section 4.7.2, *Environmental Setting,* under the *California Hazardous Materials Release Response Plans and Inventory Law of 1985* subsection, contractors would be required to prepare and implement HMBPs that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, reducing the impact to less than significant.

In addition, there are two schools located south of the Project Site. The nearest freeway to the Project Site is the Santa Monica Freeway (I-10), which is located north of the Project Site. Therefore, the most likely route for the transportation of materials to and from the Project Site would be to I-10 and away from the schools.

Finally, as discussed above in *Project Design Features*, the Project would implement Project Design Feature TRAF-PDF-1 (Final Construction Management Plan). This consists of the development and implementation of a FCMP that includes a traffic management plan that would identify truck-hauling routes and material deliveries (i.e., identify the potential routes and restrictions). Accordingly, with implementation of Project Design Feature TRAF-PDF-1, and through compliance with applicable regulations, construction related impacts associated with handling of hazardous materials within one-quarter mile of a school would be less than significant.

Operation

Once constructed, operation of the commercial use buildings would not include the transport or disposal of significant amounts of hazardous materials. The proposed commercial uses would not cause hazardous substance emissions or generate significant quantities of hazardous waste. Types of hazardous materials to be used in association with the Project, such as small quantities of

potentially hazardous materials in the form of cleaning solvents and painting supplies, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, while the Project would emit small quantities of potentially hazardous materials typical of maintenance or operational uses within one-quarter mile of an existing or proposed school, all materials would be disposed of in accordance with applicable laws and regulations, and impacts would be less than significant.

Through compliance with applicable regulations and implementation of Project Design Feature TRAF-PDF-1, impacts relative to proximity to schools would be reduced to less than significant.

Mitigation Measures

Impacts regarding proximity to schools during construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

Level of Significance after Mitigation

Impacts regarding proximity to schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold HAZ-4: The Project would result in a significant impact if it would 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.

Impact Analysis

Based on the review of regulatory databases provided in the Phase I ESA (refer to Appendix H of this Draft EIR), the Project Site was listed for one and possibly two past asbestos removal projects, and for the storage of small quantities of hazardous materials by a past tenant. None of the listings reported releases, spills, or violations. The use of hazardous materials and the disposal of hazardous materials waste was conducted in accordance with federal, State, and local regulations. Therefore, while the Project Site is listed on hazardous materials lists, the listings do not include releases, spills, or violations. In the event that additional ACM and/or LBP is discovered during demolition, impacts would be less than significant through remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences.

Mitigation Measures

Impacts regarding being listed on governmental hazardous materials lists were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding being listed on governmental hazardous materials lists were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold HAZ-5: 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, results in a safety hazard or excessive noise for people residing or working in the project area.

As discussed in the Initial Study (Appendix A), 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 airport is the Santa Monica Municipal Airport, located approximately 3.5 miles west of the Project Site. Therefore, the Project would not result in airport-related safety hazards or excessive noise for people residing or working in the Project area. Thus, the Project would have no impact with respect to Threshold HAZ-5 and no further analysis is required.

Threshold HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

Demolition, Excavation, and Construction

The Project would include temporary construction activities and could require temporary lane closures, which could potentially affect these routes. However, the construction activities would not require full street closures, and most Project construction activities would be confined to the Project Site. Given that all streets that front the Project Site have at least two lanes in both directions, only the one lane closest to the Project Site may require temporary closures. Furthermore, as discussed above in the *Project Design Features* subsection, and discussed further in Section 4.12, *Transportation*, Project construction activities would result in less than significant impacts to emergency access, response times, and traffic with implementation of Project Design Feature TRAF-PDF-1, Construction Management Plan, which would include planning for and the management of traffic into and out of the Project Site. Because of the relatively short-term nature of the construction activities and with implementation of a Construction Management Plan, the Project's construction activities would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.

The Project Site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. Furthermore, during an unanticipated disaster event, agencies would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the numerous available

disaster routes, as determined appropriate, by the applicable responding agencies to maximize effectiveness.

For the above-discussed reasons, the Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan and impacts would be less than significant.

Operations

Once operational, the Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. Therefore, the Project's proposed land use would not require a new, or interfere with an adopted, emergency response or evacuation plan and impacts would be less than significant.

Mitigation Measures

Impacts regarding an adopted emergency response plan or emergency evacuation plan were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding adopted emergency response plans or emergency evacuation plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As discussed in the Initial Study (Appendix A), the Project Site is not located in an area of moderate or very high severity fire hazard. 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. Thus, the Project would have no impact with respect to Threshold HAZ-7 and no further analysis is required.

Cumulative Impacts

Impact Analysis

This section presents an analysis of the cumulative effects of the Project in combination with other past, present, and reasonably foreseeable future related projects that could cause cumulatively considerable impacts. Significant cumulative impacts related to hazards and hazardous materials could occur if the incremental impacts of the Project combined with the incremental impacts of one or more of the 52 related projects identified on Table 3-1 and their locations relative to the Project Site are illustrated in Figure 3-1 in Chapter 3, *Environmental Setting*, of this Draft EIR.

As previously discussed, the Project would have no impact with respect to being located near an airport or airstrip, or being located within a high fire hazard severity zone. In addition, although the Project Site is listed on the Cortese List, the listings are for routine use and disposal of hazardous materials, not for spills or violations. Accordingly, the Project could not contribute to cumulative impacts related to these topics and are not discussed further.

- The geographic area affected by the Project and its potential to contribute to cumulative impacts varies based on the environmental resource under consideration. The geographic scope of analysis for cumulative hazardous materials impacts encompasses and is limited to the Project Site and its immediately adjacent area. This is because impacts relative to hazardous materials are generally site-specific and depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. For example, hazardous materials incidents tend to be limited to a smaller and more localized area surrounding the immediate spill location and extent of the release, and could only be cumulative if two or more hazardous materials releases spatially overlapped.

The timeframe during which the Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. For the Project, the operations phase is permanent. However, similar to the geographic limitations discussed above, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous materials events could only be cumulative if two or more hazardous materials releases occurred at the same time, as well as overlapping at the same location.

Construction

Significant cumulative impacts related to hazards and hazardous materials could occur if the incremental impacts of the Project combined with the incremental impacts of one or more of the related projects discussed above to substantially increase risk that people or the environment would be exposed to hazardous materials. No related projects are located directly adjacent to the Project Site. All related projects would be required to comply with the same regulations discussed above in Impact HAZ-1/HAZ-2. Consequently, there would be no adjacent sites from which spills could combine with a simultaneous spill at the Project Site.

The construction activities for all of the related projects would be subject to the same regulatory requirements discussed for the Project for compliance with existing hazardous materials regulations, including spill response. Related projects that have spills of hazardous materials would be required to remediate their respective sites to the same established regulatory standards as the Project. This would be the case regardless of the number, frequency, or size of the release(s). The responsible party associated with each spill would be required to remediate site conditions to the same established regulatory standards. The residual less-than-significant effects of the Project that would remain after mitigation would not combine with the potential residual effects of related projects to cause a potential significant cumulative impact because residual impacts would be highly site-specific and would be below regulatory standards. Accordingly, no significant cumulative impact with respect to the use of hazardous materials would result. For the above reasons, the Project would not cause or contribute to a cumulatively considerable impact with respect to the use of hazardous materials, and impacts would be less than significant.

Construction for two or more projects that occur at the same time and use the same roads could cause interference with emergency access. As previously discussed in the *Project Design Features* subsection, and discussed further in Section 4.12, *Transportation*, the Project would be required to prepare and implement Project Design Feature TRAF-PDF-1 (Construction Management Plan), which would manage the movement of vehicles such that emergency access would be maintained. Related projects would be required to prepare and implement similar traffic management plans to maintain traffic flow and prevent interference with emergency access. With the implementation of traffic control/traffic management plans, the Project would not cause or contribute to a cumulatively significant impact with respect to emergency access, and impacts would be less than significant.

Operations

Significant cumulative impacts related to operational hazards could occur if the incremental impacts of the Project combined with those of one or more of the related projects to cause a substantial increase in risk that people or the environment would be exposed to hazardous materials used or encountered during the operations phase.

Once constructed, the Project's commercial office buildings would use and store small quantities of chemicals typical in office use, such as cleaning solutions, paints, and thinners. Few of the chemicals would be considered hazardous materials (e.g., bleach), and the anticipated volumes would be small (i.e., less than 5 gallons). The surrounding land uses are also commercial, with some residential land uses. The types and volumes of chemicals used would be similar to the Project. Similar to the Project, hazardous materials use at related projects would also be required to comply with numerous regulations regarding the transportation, use, storage, and disposal of hazardous materials. Therefore, compliance with existing regulations regarding hazardous materials would reduce the risk of environmental or human exposure to such materials. The combined effects of the Project and related projects would not be cumulatively considerable result in a significant cumulative impact, and impacts would be less than significant.

Mitigation Measures

Impacts regarding cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.8 Hydrology and Water Quality

4.8.1 Introduction

This section analyzes the Project's potential impacts on hydrology (drainage flows), surface water quality, groundwater levels and groundwater quality. The analysis is primarily based on the *Crossings Campus Hydrology & Water Resources Technical Report* (Hydrology Report) prepared for the Project by KPFF Consulting Engineers in March 2022.[1] The Hydrology Report is included as Appendix I, of this Draft EIR.

4.8.2 Environmental Setting

Regulatory Framework

There are several plans, policies, and programs regarding Hydrology and Water Quality at the federal, State, regional, and local levels. Described below, these include:

- Clean Water Act
- Federal Antidegradation Policy
- National Flood Insurance Program
- Porter-Cologne Water Quality Act
- California Antidegradation Policy
- California Toxics Rule
- Sustainable Groundwater Management Act of 2014
- County of Los Angeles Hydrology Manual
- National Pollutant Discharge Elimination System Permit Program
- Los Angeles Regional Water Quality Control Plan (Basin Plan)
- Culver City Municipal Code
- Culver City Stormwater Quality Master Plan
- Los Angeles Municipal Code
- Los Angeles Low Impact Development Ordinance (Ordinance No. 181,899 and 183,833)
- Los Angeles Water Quality Compliance Master Plan for Urban Runoff
- Los Angeles Stormwater Program – Los Angeles County MS4 Permit Citywide Implementation

[1] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022. Provided as Appendix I of this Draft EIR.

Federal

Clean Water Act

The Clean Water Act (CWA), formerly known as the Federal Water Pollution Control Act, was first introduced in 1948, with major amendments in the 1960s, 1970s and 1980s.[2] The CWA authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments to the CWA in 1972 established the National Pollutant Discharge Elimination System (NPDES) permit program, which prohibits discharge of pollutants into the nation's waters without procurement of a NPDES permit from the United States Environmental Protection Agency (USEPA). The purpose of the permit is to translate general requirements of the CWA into specific provisions tailored to the operations of each organization that is discharging pollutants. Although federally mandated, the NPDES permit program is generally administered at the state and regional levels.

The USEPA NPDES program requires NPDES permits for: (1) Municipal Separate Storm Sewer Systems (MS4) Permit generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of 1 to 5 acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

Federal Antidegradation Policy

The Federal Antidegradation Policy has been incorporated within the CWA and requires states to develop state-wide antidegradation policies and identify methods for implementing them.[3] Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods must, at a minimum, protect and maintain: (1) existing in-stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the Federal Emergency Management Agency (FEMA) to evaluate flood hazards.[4] FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and development practices, by identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies (FIS). Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

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2 United States Environmental Protection Agency (USEPA), Clean Water Act, 2002.

3 USEPA, Water Quality Standards Handbook - Chapter 4: Antidegradation, 2010.

4 The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, 42 U.S.C. 4001 et. seq.

The Flood Disaster Protection Act requires owners of all structures within identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally-related financial assistance, such as mortgage loans from federally-insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA.

State

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control.[5] The California Water Code (CWC) authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. In California, the NPDES stormwater permitting program is administered by the SWRCB.

Under the CWC, the State of California is divided into nine Regional Water Quality Control Boards (RWQCBs), which govern the implementation and enforcement of the CWC and the CWA. The Project Site is located within Region 4, also known as the Los Angeles RWQCB (LARWQCB). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a Water Quality Control Plan or Basin Plan for its region. The Basin Plan establishes beneficial use definitions for the various types of water bodies, and serves as the basis for establishing water quality objectives, discharge conditions and prohibitions, and must adhere to the policies set forth in the CWC and established by the SWRCB. In this regard, the LARWQCB issued the Los Angeles Basin Plan on August 29, 2014, for the Coastal Watersheds of Los Angeles and Ventura Counties, with subsequent amendments. The RWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality.[6]

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB in 1968.[7] Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just surface waters. The policy states that, whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of the water resource.

California Toxics Rule

In 2000, the California Environmental Protection Agency (CalEPA) promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to

5 California Water Code, Division 7, Water Quality, Section 13000 et seq.
6 USEPA, Clean Water Act, 2016.
7 California State Water Resources Control Board, State Board Resolution No. 68-16, 1968.

waters in the State.[8] CalEPA promulgated this rule based on CalEPA's determination that the numeric criteria of specific concentrations of regulated substances are necessary for the State to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and to impose fees and assessments. SGMA also allows the SWRCB to intervene if local agencies will not or do not meet the SGMA requirements, in addition to mandating that critically overdrafted basins be sustainable by 2040, and medium- or high-priority by 2042. The Project Site is located within Basin 4-011.01, Coastal Plain of Los Angeles–Santa Monica, which has been designated by the DWR as a medium-priority basin requiring compliance with SGMA.[9]

Regional

County of Los Angeles Hydrology Manual

Drainage and flood control in the City of Los Angeles are subject to review and approval by the Department of Public Works, Bureau of Engineering (Bureau of Engineering) and the Department of Building and Safety. Storm drains within the City are constructed by both the City and the Los Angeles County Flood Control District (County Flood Control). The County Flood Control constructs and has jurisdiction over regional facilities such as major storm drains and open flood control channels, while the City constructs and is responsible for local interconnecting tributary drains. Similarly, drainage and flood control in Culver City are subject to review and approval by the Culver City Department of Public Works and have jurisdiction over local interconnecting tributary drains.

Both cities have adopted the Los Angeles County Department of Public Works' Hydrology Manual as the basis of design for storm drainage facilities.[10] The Department of Public Works' Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year (also called Q50) storm event.[11] Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event. The County also limits the allowable discharge into existing storm drain (MS4) facilities based on the County's MS4

8 USEPA, Water Quality Standards, Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California, 2001.

9 Dudek, Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin, January 2022.

10 Los Angeles County Department of Public Works, Hydrology Manual, 2006.

11 A 50-year or Q50 storm event has a 1 in 50 or 2 percent chance of occurring in a year.

Permit, which is enforced on all new developments that discharge directly into the County's MS4 system.

As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves MS4 plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned MS4 facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

National Pollutant Discharge Elimination System Permit Program

As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. The following NPDES permits address stormwater and dewatering.

Construction: Construction General Permit

The SWRCB adopted the Construction General Permit for Stormwater Discharges from Construction Activities on September 2, 2009 (Order No. 2009-0009-DWQ, General NPDES Permit No. CAS000002) and amended the permit on July 17, 2012 (Order Nos. 2010-0014-DWQ and 2012-0006-DWQ). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges.

For all construction activities disturbing one acre of land or more, California mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of best management practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the Construction General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.[12] The purpose of an SWPPP is to identify potential sources and types of pollutants associated with construction activity and list BMPs that would prohibit pollutants from being discharged from the construction site into the public stormwater system. BMPs typically address stabilization of construction areas, minimization of erosion during construction, sediment control, control of pollutants from construction materials, and post-construction stormwater management (e.g., the minimization of impervious surfaces or treatment of stormwater runoff). The SWPPP is also required to include a discussion of the proposed program to inspect and maintain all BMPs.

[12] Construction Stormwater Program, State Water Resources Control Board, October 30, 2019, https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html. Accessed July 12, 2022.

A site-specific SWPPP could include, but not be limited to the following BMPs:

- Erosion Control BMPs – to protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels. Such BMPs may include, but would not be limited to, use of geotextiles and mats, earth dikes, drainage swales, and slope drains.
- Sediment Control BMPs – are treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMPs would be based on keeping sediments on-site and controlling the site boundaries. Such BMPs may include, but would not be limited, to use of silt fences, sediment traps, and sandbag barriers, street sweeping and vacuuming, and storm drain inlet protection.
- Wind Erosion Control BMPs – consist of applying water to prevent or minimize dust nuisance.
- Tracking Control BMPs – consist of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. Project sites are required to maintain a stabilized construction entrance to prevent off-site tracking of sediment and debris.
- Non-Stormwater Management BMPs – also referred to as "good housekeeping practices," involve keeping a clean, orderly construction site.
- Waste Management and Materials Pollution Control BMPs – consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate RWQCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction, and must prepare a State SWPPP that incorporates the minimum BMPs required under the permit as well as appropriate project-specific BMPs. The SWPPP must be completed and certified by the developer, and BMPs must be implemented prior to the commencement of construction and may require modification during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

Construction: NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering

Dewatering operations are practices that discharge non-stormwater, such as ground water, that must be removed from a work location to proceed with construction into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. A NPDES Permit for dewatering discharges was adopted by the LARWQCB on September 13, 2018 (Order No. R4-2018-0125, General NPDES Permit No. CAG994004). Similar to the Construction General Permit, to be authorized to discharge under this Permit, the developer must submit a NOI to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this

Permit.[13] In accordance with the NOI, among other requirements and actions, the discharger must demonstrate that the discharges will not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters. The discharger must obtain and analyze (using appropriate methods) a representative sample of the groundwater to be treated and discharged under the Order. The analytical method used shall be capable of achieving a detection limit at or below the minimum level. The discharger must also provide a feasibility study on conservation, reuse, and/or alternative disposal methods of the wastewater and provide a flow diagram of the influent to the discharge point.[14]

Operation: Los Angeles County Municipal Stormwater NPDES Program

The County of Los Angeles, City of Los Angeles, and Culver City are Co-Permittees under the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004, effective September 11, 2021).[15] The Los Angeles County MS4 Permit has been determined by the SWRCB to be consistent with the requirements of the CWA and the Porter-Cologne Act for discharges through the public storm drains in Los Angeles County to statutorily-defined waters of the United States (33 United States Code [USC] Section 1342(p); 33 CFR Part 328.11). On September 8, 2016, the LARWQCB amended the Los Angeles County MS4 Permit to incorporate modifications consistent with the revised Ballona Creek Watershed Trash Total Maximum Daily Load (TMDL), among other TMDLs incorporated into the Los Angeles County MS4 Permit and the Basin Plan for the Coastal Waters of Los Angeles and Ventura Counties.

Under the amended Los Angeles County MS4 Permit, the County and both cities are required to implement development planning guidance and control measures that control and mitigate stormwater quality and runoff volume impacts to receiving waters as a result of new development and redevelopment. The County and both cities also are required to implement other municipal source detection and elimination programs, as well as maintenance measures.

Under the Los Angeles County MS4 Permit, permittees are required to implement a development planning program to address stormwater pollution. This program requires project applicants for certain types of projects to implement a Low Impact Development (LID) Plan. The purpose of the LID Plan is to reduce the discharge of pollutants in stormwater by outlining BMPs, which must be incorporated into the design of new development and redevelopment. These treatment control BMPs must be sufficiently designed and constructed to treat or retain the greater of an 85th percentile rain event or first 0.75 inch of stormwater runoff from a storm event.

[13] Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2018.

[14] Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2013.

[15] Los Angeles Regional Water Quality Control Board, Order No. R4-2021-0105, NPDES Permit No. CAS004004, Regional Phase I MS4 NPDES Permit, Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit For Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties. September 11, 2021.

The Los Angeles County MS4 Permit (Part VIII.F.4, Priority Development Project Structural BMP Performance Requirements) includes design requirements for new development and substantial redevelopment. These requirements apply to all projects that create or replace more than 5,000 square feet (sf) of impervious cover. Where redevelopment results in an alteration to more than 50 percent of impervious surfaces of a previously existing development and the existing development was not subject to post-construction stormwater quality control requirements (i.e., the existing development already has BMPs that comply with the MS4 Permit requirements), the entire project would be subject to post-construction stormwater quality control measures.

The Enhanced Watershed Management Program (EWMP) for the Ballona Creek Group [Los Angeles County, Los Angeles County Flood Control District (LACFCD), Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, and West Hollywood] describes a customized compliance pathway that participating agencies will follow to address the pollutant reduction requirements of the Los Angeles County MS4 Permit.[16] By electing the optional compliance pathway in the MS4 Permit, the Ballona Creek Watershed Management Group (BCWM Group) has leveraged this EWMP to facilitate a robust, comprehensive approach to stormwater planning for the Ballona Creek watershed. The objective of the EWMP Plan is to determine the network of BMPs that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Permit requires the identification of Watershed Control Measures, which are strategies and BMPs that will be implemented through the EWMP, individually or collectively, at watershed-scale to address the Water Quality Priorities in the EWMP. The Water Quality Priorities highlight the pollutants and waterbodies that are potentially not attaining water quality standards.[17] The EWMP Implementation Strategy is used as a recipe for compliance for each jurisdiction to address Water Quality Priorities and comply with the provisions of the MS4 Permit. The EWMP Implementation Strategy includes individual recipes for each of the 8 jurisdictions and each watershed/assessment area—Ballona Creek, Centinela Creek, and Sepulveda Channel. Implementation of the EWMP Implementation Strategy will provide a BMP-based compliance pathway for each jurisdiction under the MS4 Permit. The permit specifies that an adaptive management process will be revisited every two years to evaluate the EWMP and update the program. The EWMP Implementation strategy will evolve based on monitoring results by identifying updates to the EWMP Implementation Plan to increase its effectiveness.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of the Stormwater Management Program (SMP). The objective of the SMP is to reduce pollutants in urban stormwater discharges to the "maximum extent practicable" to attain water quality objectives and protect the beneficial uses of receiving waters in Los Angeles County. Special provisions are provided in the Los Angeles County MS4 Permit to facilitate implementation of the SMP. In addition, the Los Angeles County MS4 Permit requires that permittees implement a LID Plan, as discussed above, that designates BMPs that must be used in specified categories of development projects to infiltrate water, filter, or treat stormwater runoff; control peak flow discharge; and

[16] Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, January 2016.

[17] Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, p. ES-1, January 2016.

reduce the post-project discharge of pollutants into stormwater conveyance systems. In response to the Los Angeles County MS4 Permit requirements, the City of Los Angeles adopted Ordinance No. 173,494 (Stormwater Ordinance), as authorized by Los Angeles Municipal Code (LAMC) Section 64.72, and prepared the Low Impact Development Plan, which is further discussed below along with the City of Los Angeles LID Manual. Similarly, Culver City adopted the Culver City Stormwater Quality Master Plan (SWQMP) in May 2021, to guide proposed actions for compliance with the MS4 permit and the EWMP.[18]

Los Angeles Regional Water Quality Control Plan (Basin Plan)

The preparation and adoption of water quality control plans (Basin Plans) is required by the California Water Code (Section 13240) and supported by the CWA. Section 303 of the CWA requires states to adopt water quality standards which "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." According to Section 13050 of the CWC, Basin Plans consist of a designation or establishment for the waters within a specified area of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives. Because beneficial uses,[19] together with their corresponding water quality objectives, can be defined per federal regulations as water quality standards, the Basin Plans are regulatory references for meeting the State and federal requirements for water quality control. Los Angeles County is included under the jurisdiction of the LARWQCB.

Local

City of Culver City

Culver City Municipal Code

Culver City Municipal Code (CCMC) refers to the previously discussed Los Angeles County MS4 Permit for storm drain planning and design calculations. All drainage improvements in the vicinity of the Project are subject to review and approval by LACDPW and the Public Works Department of Culver City, as appropriate.

Culver City Municipal Code Section 5.05.010, Findings

CCMC Section 5.05.010 identifies Culver City as a permittee under the County of Los Angeles NPDES Permit (Permit Nos. R4-2012-0175 and CAS004001, MS4 Permit, since updated to R4-2021-0105 as previously discussed) and subject to the discharge requirements of this permit. This section also authorizes Culver City to adopt BMP requirements for new development and redevelopment (such as those below) to help Culver City comply with the discharge requirements.

Culver City Municipal Code Section 5.05.030, Requirements for Requirements for Existing Properties; Good Housekeeping Provisions

CCMC Section 5.05.030 requires owners and occupants of property in Culver City to implement non-structural and/or structural BMPs to prevent or reduce the discharge of operational pollutants to the municipal storm drain system to the maximum extent practicable, such as: minimizing

[18] Culver City Public Works Department. Culver City Stormwater Quality Master Plan. May 2021.

[19] The SWRCB defines beneficial uses as the uses of water necessary for the survival or wellbeing of man, plants and wildlife. These uses of water serve to promote the tangible and intangible economic, social and environmental goals of mankind.

washing down of paved areas and runoff from irrigation to the extent practicable; sweeping and collecting debris from paved areas; conducting vehicle maintenance in protected areas that avoid the discharge of associated pollutions to the storm drain system; periodic sweeping of parking lots with more than 25 parking spaces that are subject to stormwater runoff; and application of measures in areas where fuels, chemicals, animal waste, garbage, batteries, or other materials are used, stored or disposed of to avoid adverse impacts on water quality.

Culver City Municipal Code Section 5.05.035, Requirements for Industrial/Commercial and Construction Activities

CCMC Section 5.05.035 requires construction activities subject to NPDES requirements to implement non-structural and/or structural BMPs to reduce sediment, construction waste, trash, and other pollutants from construction activities be reduced to the maximum extent practicable; cover soil piles between October 1 and April 15 to avoid sedimentation; avoid washing construction vehicles where the runoff can enter the storm drain system; and implement a City-approved SWPPP and Wet Weather Erosion Control Plan for construction activities.

Culver City Municipal Code Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects

CCMC Section 5.05.040 requires the implementation of LID strategies and Standard Urban Stormwater Mitigation Plan (SUSMP) outlining pollution prevention control requirements during operation for projects meeting specified size and/or redevelopment criteria to mimic predevelopment hydrology. LID strategies include infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use to retain stormwater runoff on-site for the Stormwater Quality Design Volume (SWQDv) defined as the 85 percentile 24-hour runoff event from the Los Angeles County 85th percentile precipitation isohyetal map. SUSMP stormwater pollution control strategies include but may not be limited to: minimizing impervious surface area; conserving natural areas; providing storm drain system stenciling and signage; conducting periodic street and parking lot sweeping; minimizing runoff during irrigation; avoiding motor vehicle washing where the runoff can enter the storm drain system; and installing grease/oil clarifiers.

Culver City Stormwater Quality Master Plan

Culver City Municipal Code refers to the previously discussed Los Angeles County MS4 Permit for storm drain planning and design calculations. Culver City developed the Culver City Stormwater Quality Master Plan (SWQMP), adopted in May 2021, to guide proposed actions for compliance with the MS4 permit and the EWMP.[20] The Culver City SWQMP is intended to be used as a custom compliance tool for Culver City to achieve stormwater quality goals, and includes guidance to assist developers in complying with the MS4 permit. LID projects are distributed, smaller-scale BMPs that capture, infiltrate, harvest and use, or treat runoff on a parcel level. They are designed to receive surface runoff from either the surface directly or diversion from storm drainpipes. Examples generally include rainwater cisterns, rain gardens, permeable pavements, and infiltration BMPs.

[20] Culver City Public Works Department. Culver City Stormwater Quality Master Plan. May 2021.

City of Los Angeles

Los Angeles Municipal Code

Los Angeles Municipal Code Section 62.105, Construction "Class B" Permit

Proposed drainage improvements within the street rights-of-way or any other property owned by, to be owned by, or under the control of the City, require the approval of a B-permit (LAMC Section 62.105). Under the B-permit process, storm drain installation plans are subject to review and approval by the Bureau of Engineering. Additionally, connections to the MS4 system from a property line to a catch basin or a storm drainpipe require a storm drain permit from the Bureau of Engineering.

Los Angeles Municipal Code Sections 12.40 through 12.43, Landscape Ordinance

In 1996, Ordinance No. 170,978 amended LAMC Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City of Los Angeles. LAMC Section 12.40 contains general requirements, including a point system for specific project features and techniques in order to determine compliance with the Ordinance, and defines exemptions from the Ordinance. LAMC Section 12.41 sets minimum standards for water delivery systems (irrigation) to landscapes. LAMC Section 12.43 defines the practices addressed by the Ordinance, of which two are applicable to stormwater management. The Heat and Glare Reduction practice states among its purposes the design of vehicular use areas that reduce stormwater runoff and increase groundwater recharge. The Soil and Watershed Conservation practice is intended to encourage the restoration of native areas that are unavoidably disturbed by development; to conserve soil and accumulated organic litter and reduce erosion by utilization of a variety of methods; and to increase the "residence time of precipitation" (i.e., the time between the original evaporation and the returning of water masses to the land surface as precipitation) within a given watershed. Implementation guidelines developed for the Ordinance provide specific features and techniques for incorporation into projects, and include water management guidelines addressing runoff, infiltration, and groundwater recharge. This Ordinance is incorporated into the LID Ordinance discussed below.

Los Angeles Municipal Code Section 64.70, Stormwater and Urban Runoff Pollution Control Ordinance

LAMC Section 64.70, the Stormwater and Urban Runoff Pollution Control Ordinance, was added by Ordinance No. 172,176 in 1998 and prohibits the discharge of unauthorized pollutants in the City. The Watershed Protection Program (Stormwater Program) for the City is managed by the Department of Public Works, Bureau of Sanitation (LASAN) along with all City Flood Protection and Pollution Abatement (Water Quality) Programs, including but not limited to, regulatory compliance, implementation, operations, reporting and funding. Section 64.70 sets forth uniform requirements and prohibitions for discharges and places of discharge into the storm drain system and receiving waters necessary to adequately enforce and administer all federal and State laws, legal standards, orders and/or special orders that provide for the protection, enhancement and restoration of water quality. Through a program employing watershed-based approaches, the regulation implements the following objectives:

1. To comply with all federal and State laws, lawful standards and orders applicable to stormwater and urban runoff pollution control;

2. To prohibit any discharge which may interfere with the operation of, or cause any damage to the storm drain system, or impair the beneficial use of the receiving waters;
3. To prohibit illicit discharges to the storm drain system;
4. To reduce stormwater runoff pollution;
5. To reduce non-stormwater discharge to the storm drain system to the maximum extent practicable; and
6. To develop and implement effective educational outreach programs designed to educate the public on issues of stormwater and urban runoff pollution.

The Ordinance applies to all dischargers and places of discharge that discharge stormwater or non-stormwater into any storm drain system or receiving waters. While this practice is prohibited under the County's Municipal NPDES Permit, adoption of the Ordinance allows enforcement by the City Department of Public Works as well as the levy of fines for violations. General discharge prohibitions require that no person shall discharge, cause, permit, or contribute to the discharge of any hazardous materials and substances (liquids, solids, or gases) into to the storm drain system or receiving waters that constitute a threat and/or impediment to life and the storm drain system, singly or by interaction with other materials. A specific list of prohibited substances can be found under LAMC Section 64.70.

Under LAMC Section 64.70.02.D, Requirement to Prevent, Control, and Reduce Stormwater Pollutants, any owner of a facility engaged in activities or operations as listed in the Critical Sources Categories, Section III of the City's Board of Public Work's Rules and Regulations shall be required to implement BMPs as promulgated in the Rules and Regulations. The owner/developer of a property under construction shall be required to implement the stormwater pollution control requirements for construction activities as depicted in the project plans approved by the Los Angeles Department of Building and Safety. In the event a specified BMP proves to be ineffective or infeasible, the additional and/or alternative, site-specific BMPs or conditions deemed appropriate to achieve the objectives of this Ordinance as defined in LAMC Section 64.70.B shall be implemented.

Los Angeles Municipal Code Section 64.72, Stormwater Pollution Control Measures for Developing Planning and Construction Activities

LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities, was added by Ordinance 181,899 (LID Ordinance) originally in 2000 and sets forth requirements for construction activities and facility operations of development and redevelopment projects to comply with the requirements of the NPDES permit requirements. The provisions of this section contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the Land Development requirements of the Los Angeles County MS4 permit through integrating LID practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all developments and redevelopments consistent with the City's Landscape Ordinance and other related requirements in the Watershed Protection Division of LASAN's Development Best Management Practices Handbook.

Los Angeles Low Impact Development Ordinance (Ordinance No. 181,899 and 183,833)

In 2011, the City adopted a Citywide LID Ordinance that amended the City's existing Stormwater Ordinance (LAMC Section Nos. 64.70 and 64.72, discussed above). The LID Ordinance, effective May 12, 2012, and updated in September 2015 (Ordinance No. 183,833), enforces the requirements of the Los Angeles County MS4 Permit. LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to their source as possible; and that promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater.

The goal of LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff can be used.[21]

The intent of the LID standards is to:

- Require the use of LID practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reduce stormwater/urban runoff while improving water quality;
- Promote rainwater harvesting;
- Reduce off-site runoff and provide increased groundwater recharge;
- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

The Citywide LID strategy addresses land development planning as well as storm drain infrastructure. The City's LID is implemented through BMPs that fall into four categories: site planning BMPs, landscape BMPs, building BMPs, and street and alley BMPs. While the LID Ordinance and the BMPs contained therein comply with Los Angeles County MS4 Permit requirements for stormwater management, the MS4 requirements apply only to proposed new development and redevelopment of a certain size, primarily address stormwater pollution prevention as opposed to groundwater recharge, and vary over time as the permit is reissued every five years. The LID Ordinance provides a consistent set of BMPs that are intended to (1) be inclusive of, and potentially exceed, the former Standard Urban Stormwater Mitigation Plan (SUSMP) standards, (2) apply to existing as well as new development, and (3) emphasize natural drainage features and groundwater recharge in addition to pollution prevention in receiving waters. The LID Ordinance requires the capture and management of the greater of an 85th percentile rain event or the first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

[21] City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

Per the City's 2016 LID Manual's Figure 3.3 and Section 4.1, the City's preferred LID improvement is on-site infiltration of stormwater, since it allows for groundwater recharge and reduces the volume of stormwater entering municipal drains.[22] If site conditions are not suitable for infiltration, the City requires on-site retention via stormwater capture and reuse. Should capture and reuse be deemed technically infeasible, high efficiency bio-filtration/bioretention systems should be utilized. Lastly, under the LID Ordinance (LAMC Section 64.72 C.6), as interpreted in the LID Manual, if no single approach listed in the LID Manual is feasible, then a combination of approaches may be used.[23]

Los Angeles Water Quality Compliance Master Plan for Urban Runoff

The City of Los Angeles' Water Quality Compliance Master Plan for Urban Runoff (Water Quality Compliance Master Plan) [24] was developed by the LASAN's Watershed Protection Division, and was adopted in April 2009. Note that Culver City complies with urban runoff through their Culver City Stormwater Quality Master Plan, as discussed above.

The Water Quality Compliance Master Plan addresses planning, budgeting, and funding for achieving clean stormwater and urban runoff for the next 20 years and presents an overview of the status of urban runoff management within the City of Los Angeles. The Water Quality Compliance Master Plan identifies the City's four watersheds; summarizes water quality conditions in the City's receiving waters as well as known sources of pollutants; summarizes regulatory requirements for water quality; describes BMPs required by the City for stormwater quality management; and discusses related plans for water quality that are implemented within the Los Angeles region, particularly TMDL Implementation Plans and Watershed Management Plans in Los Angeles.

Los Angeles Stormwater Program – Los Angeles County MS4 Permit Citywide Implementation

The Watershed Protection Division of LASAN is responsible for stormwater pollution control throughout the City of Los Angeles in compliance with the Los Angeles County MS4 Permit. The Watershed Protection Division administers the City's Stormwater Program, which has two major components: Pollution Abatement and Flood Control. The Watershed Protection Division publishes the two-part Development Best Management Practices Handbook that provides guidance to developers for compliance with the Los Angeles County MS4 permit through the incorporation of water quality management into development planning. The Development Best Management Practices Handbook, Low Impact Development Manual, Part B: Planning Activities (LID Handbook) provides guidance to developers to ensure the post-construction operation of newly developed and redeveloped facilities comply with the Developing Planning Program regulations of the City's Stormwater Program.[25] The LID Handbook assists developers with the selection, design, and incorporation of stormwater source control and treatment control BMPs into project design plans, and provides an overview of the City's plan review and permitting process. The LID

[22] City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

[23] City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

[24] City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

[25] City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

Handbook addresses the need for frequent and/or regular inspections of infiltration facilities in order to ensure on-site compliance of BMP standards, soil quality, site vegetations, and permeable surfaces. These inspections are required to guarantee that facilities follow all proprietary operation and maintenance requirements.

During the development review process, project plans are reviewed for compliance with the City of Los Angeles General Plan, zoning ordinances, and other applicable local ordinances and codes, including stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

Existing Conditions

Surface Water Hydrology (Drainage)

Regional

The 4.46-acre Project Site is located within the Ballona Creek Watershed (Watershed) in the Los Angeles Basin. The Watershed encompasses an area of approximately 130 square miles extending from the Santa Monica Mountains and the Ventura–Los Angeles County line on the north, to the Harbor Freeway (110) on the east, Santa Monica to the west, and to the Baldwin Hills on the south. Ballona Creek is a 9-mile-long flood protection channel that drains the Watershed to the Pacific Ocean. The major tributary areas to Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains.

Local

The Project Site is relatively flat land that straddles the border of Culver City (1.63 acres) and the City of Los Angeles (2.83 acres). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and commercial uses to the east. There are two separate storm drain systems in the streets surrounding the Project Site where flow is collected. An 89-inch storm drain line belonging to LACFCD flows south in National Boulevard before turning to flow east in Washington Boulevard. This storm drain continues to flow east and south before discharging to Ballona Creek. The second storm drain is a 33-inch storm drain owned and maintained by the City of Los Angeles that flows east on the north side of Venice Boulevard. This storm drain continues flowing east before discharging to Ballona Creek. Ballona Creek generally flows southwest, ultimately discharging into the Pacific Ocean at Santa Monica Bay. Ballona Creek is designed to discharge to Santa Monica Bay approximately 71,400 cubic feet per second from a 50-year frequency storm event.[26]

Project Site

The Project Site has three distinct drainage areas: discharge to Venice Boulevard, National Boulevard, and Washington Boulevard. The existing drainage conditions are shown on Figure 2 of the Hydrology Report in Appendix I of this Draft EIR. Although the Project Site is divided between two jurisdictions (i.e., Culver City and the City of Los Angeles), a portion of the existing stormwater drainage is routed from the Los Angeles parcel to the Culver City parcel via on-site

[26] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022, p. 17. Provided as Appendix I of this Draft EIR.

catch basins that are piped in the southwesterly direction towards the drainage system within National Boulevard.

The buildings fronting on Venice Boulevard are located within the Los Angeles parcel and partially drain via roof and curb drains to Venice Boulevard. From there, flow continues east and is collected in a catch basin on Venice Boulevard adjacent to the northeast corner of the site.

Approximately 0.21 acres (4.7 percent of the site) located at the southeast corner of the Project Site fronting Washington Boulevard drains to the Washington Boulevard curb face. Stormwater flows via gutter to a catch basin on the Wesley Street and Washington Boulevard intersection.

As indicated in **Table 4.8-1**, *Existing On-Site Drainage Conditions*, the Project Site is subdivided into three drainage areas, with the total impervious area approximately 95.5 percent of the Project Site. As further indicated in Table 4.8-1, stormwater runoff generated at the Project Site during the design (e.g., 50-year or Q50) storm event is maximum of 13.39 cubic feet per second (cfs). The Project Site does not receive off-site runoff.

TABLE 4.8-1
EXISTING ON-SITE DRAINAGE CONDITIONS

Drainage Area (#)	Drainage Area (acres)	Impervious Area (%)	Q50 Peak Flow (cfs)
DA1 (to Venice Blvd.)	1.00	98.1	3.01
DA2 (to National Blvd)	3.25	94.4	9.75
DA3 (to Washington Blvd.)	0.20	100	0.63
Total	**4.46**	**95.5**	**13.39**

NOTES: DA = drainage area; cfs = cubic feet per second.
SOURCE: KPFF Consulting Engineers, 2022.

No streams or rivers are located on or adjacent to the Project Site—the closest such feature is Ballona Creek located approximately 3,600 feet to the south and east.

Surface Water Quality

Regional

As stated above, the Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's CWA Section 303(d) List include indicator bacteria, copper, cyanide, lead, toxicity, trash, viruses (enteric), and zinc. No TMDL data have been recorded by USEPA for this waterbody.[27]

Local

In general, urban stormwater runoff occurs following precipitation events, especially during the early phases of a precipitation event called first-flush, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may

[27] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022, p. 18. Provided as Appendix I of this Draft EIR.

be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. The City of Los Angeles and LACFCD, which maintains catch basins in Culver City, typically install catch basins with screens to capture debris before entering the storm drain system. In addition, City of Los Angeles and Culver City conduct routine street cleaning operations, as well as periodic cleaning and maintenance of catch basins, to reduce stormwater pollution within their respective jurisdictions.

Project Site

While the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from existing impervious surfaces such as building roof areas and pavements, there are a range of non-structural BMPs and environmental water quality measures that are currently utilized at the Project Site to minimize the impact of pollutant sources. These include general housekeeping practices such as regular trash collection; spill prevention and response activities where applicable; proper storage of hazardous materials and wastes; and substituting environmentally friendly products for environmentally hazardous products, such as soaps, solvents, and pesticides. In addition, stormwater runoff from the minimal existing pervious surfaces, such as the landscaped areas, is naturally treated to some extent by existing vegetation and the absorptive properties of the existing soils. Based on the existing operations within the Project Site, the on-site runoff likely contains the following pollutants of concern that are typical of landscaped areas and surface parking lots: sediment, nutrients, pesticides, metals, pathogens, and oil and grease.

Groundwater Hydrology

Regional

Groundwater use for domestic water supply is a major beneficial use of groundwater basins in Los Angeles County. The Cities of Los Angeles and Culver City overlie Basin 4-011.01, Coastal Plain of Los Angeles–Santa Monica (Basin).[28] The Basin is comprised of the Hollywood, Santa Monica, Central, and West Coast Groundwater Subbasins. Groundwater flow in the Basin is generally south-southwesterly and may be restricted by natural geological features. Replenishment of groundwater basins occurs mainly by percolation of precipitation throughout the region via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins, as well as injection wells designed to pump freshwater along specific seawater barriers to prevent the intrusion of salt water.

Local

The Project Site lies along the eastern edge of the Santa Monica Subbasin.[29] The Santa Monica Subbasin is bounded on the north by the Santa Monica Mountains, on the east by Newport-Inglewood Fault Line, on the west by Pacific Ocean, and on the south by the Ballona Escarpment. Groundwater in the Subbasin is replenished primarily by percolation of precipitation and stream flow from the Santa Monica Mountains to the north. Over time, urbanization has decreased the

[28] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022, p. 19. Provided as Appendix I of this Draft EIR.

[29] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022, p. 19. Provided as Appendix I of this Draft EIR.

amount of pervious surfaces limiting natural recharge through direct percolation. The natural safe yield of the Subbasin is estimated to be approximately 3,000 acre-feet per year (AFY).

Project Site

The Hydrology Report noted that the depth to groundwater has been observed as shallow as 28.8 feet below the ground surface (bgs).[30] Approximately 95 percent of the Project Site is currently impervious, which limits the infiltration of rainwater into the subsurface and to groundwater. The remaining 5 percent of the Project Site is comprised of vegetated planters along building perimeters and within the surface parking lot. Given the limited pervious area, it is unlikely that the existing Project Site has any significant contribution or effect to groundwater.

Groundwater Quality

Regional

As stated above, the Project Site overlies the Los Angeles Coastal Plain Groundwater Basin, specifically the Santa Monica subbasin, which falls under the jurisdiction of the LARWQCB. According to LARWQCB's Basin Plan, water quality objectives applying to all groundwater in the region include bacteria, chemical constituents and radioactivity, mineral quality, nitrogen (nitrate, nitrite), and taste and odor.

Local

As previously stated, the Project Site lies along the eastern edge of the Santa Monica Subbasin.[31] Based upon LARWQCB's Basin Plan, constituents of concern listed for the Santa Monica Subbasin include boron, chloride, nitrate, sulfate, and Total Dissolved Solids (TDS). Regular sampling and recording of groundwater quality data in the Subbasin began in the 1980s and observed that groundwater quality in some areas has been negatively impacted by industrial activity. Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR, provides further discussion of groundwater quality at the Project Site.

Project Site

Given the impervious percentage of the Project Site, as well as its existing storm drain infrastructure, it is unlikely that the Project Site contributes significantly to groundwater recharge.[32] Stormwater is routed from the Project Site to catch basins on Venice Blvd, National Blvd, and Washington Blvd. Therefore, the existing Project Site does not significantly contribute to groundwater pollution or otherwise significantly adversely impact groundwater quality.

Although it is possible for surface water borne contaminants to percolate into groundwater and affect groundwater quality, as the Project Site is 95 percent impervious in the existing condition, no appreciable infiltration of potential contaminants described above is expected to occur. Additionally, good housekeeping practices and compliance with all existing

[30] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022, p. 23. Provided as Appendix I of this Draft EIR.

[31] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022. Provided as Appendix I of this Draft EIR.

[32] EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021. Provided as Appendix H of this Draft EIR.

hazardous waste regulations further reduce this potential. Therefore, groundwater quality is not expected to be impacted by existing activities at the Project Site.

Flood Hazards

Flood hazards in an urban environment are influenced by development patterns, as storm events contribute to rapid runoff over impervious surfaces and can flood local drainages. The Project Site is located within a FEMA Zone X (Area of Minimal Flood Hazard).[33] This means that it is highly unlikely that flooding will occur during a 100- or 500-year storm event.

Tsunami and Seiche Hazards

Tsunamis are ocean waves generated by vertical movement of the sea floor, normally associated with earthquakes or volcanic eruptions. Seiches are oscillations of enclosed or semi-enclosed bodies of water that result from seismic events, wind stress, volcanic eruptions, underwater landslides, and local basin reflections of tsunamis. The Project Site is substantially inland from nearby coastal areas and well outside of tsunami inundation zones. The Project Site does not contain and is not adjacent to open bodies of water subject to seiches.

4.8.3 Project Impacts

Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the CEQA Guidelines. Accordingly, a significant impact associated with hydrology would occur if the Project were to:

- **H/WQ-1:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **H/WQ-2:** Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- **H/WQ-3:** Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - **i.** result in substantial erosion or siltation on- or off-site.
  - **ii.** substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
  - **iii.** create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
  - **iv.** impede or redirect flood flows.

[33] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022. Provided as Appendix I of this Draft EIR.

- **H/WQ-4:** In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- **H/WQ-5:** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Section XIX, Utilities and Service Systems, of Appendix G, addresses impacts on utilities, including stormwater drainage facilities. In accordance with this, the Project would have a significant impact if it would:

- **H/WQ-6:** Require or result in the relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects.

For this analysis, the Appendix G Thresholds are relied upon.

Methodology

The analysis in this section addresses potential Project impacts on hydrology and water quality. The analysis is predominantly based on the *Crossings Campus Hydrology & Water Resources Technical Report* prepared for the Project by KPFF Consulting Engineers and included in Appendix I of this Draft EIR.

Surface Water Quality

Water quality impacts were assessed by characterizing the types of pollutants and/or effects on water quality likely to be associated with temporary construction and long-term operation of the Project, and expected contaminant flows with Project implementation. Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would reduce potential Project impacts.

Under Section 3.1.3 of the City of Los Angeles' LID Manual and Culver City SUSMP, post-construction stormwater runoff from a new development must be, in order of desirability, infiltrated, captured and used, and/or treated through high efficiency on-site biofiltration/bioretention systems for at least the volume of water produced by the greater of the 85th percentile storm[34] or the 0.75-inch storm event. In accordance with these requirements, the feasibility of the different potential BMPs outlined in the LID Manual and SUSMP are evaluated in the analysis, and the required capacity of the identified preferred feasible BMP is calculated.

Groundwater

Impacts to groundwater quality were assessed by identifying the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project. The analysis compares existing conditions to the Project during both construction and operational conditions.

[34] The 85th percentile storm event is a storm event where 85 out of 100 storms would be smaller.

Analysis of the Project impact on groundwater levels includes assessing the pre- and post-Site permeability, construction dewatering, determining the projected reduction in groundwater resources and any existing wells within a one-mile radius of the Project Site, and projecting the change in local or regional groundwater flow patterns.

Hydrology (Drainage)

The analysis of potential impacts to the existing hydrologic drainage system includes a calculation of existing (pre-Project) and post-Project runoff rates during a 50-year and an 85th-percentile storm event. Potential impacts to the storm drain system for this Project were analyzed by comparing the calculated existing runoff rates to the calculated post-Project runoff rates to determine the Project's effect on drainage flows. The Project's proposed on-site stormwater treatment system is evaluated for consistency with applicable regulatory measures for reducing drainage impacts.

The Project Site's drainage collection, treatment, and conveyance are regulated by City regulations, which adopted the Los Angeles County Hydrology Manual as the basis of design for storm drainage facilities. The Hydrology Manual requires projects to have drainage facilities that meet the "Urban Flood" level of protection. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed. A 25-year frequency design storm has a probability of 1/25 of being equaled or exceeded in any year. To provide a more conservative analysis, the analysis below assesses the larger storm event threshold (i.e., the 50-year storm event).

The Modified Rational Method (MODRAT) was used to calculate stormwater runoff as required by the County's Hydrology Manual. To reduce peak flows, MODRAT uses the design storm and time of concentration to calculate runoff at different times throughout the storm and allows for consideration of attenuation through channel storage, retention basins, etc.

The Los Angeles County Department of Public Works has developed a time of concentration calculator, Hydrocalc, to automate time of concentration calculations as well as the peak runoff rates and volumes using the MODRAT design criteria as outlined in the Hydrology Manual. Hydrocalc was used to calculate the storm water peak runoff flow rate for the Project conditions. Both the City of Los Angeles and Culver City use the County Hydrology Manual.

Water Quality and Sustainable Groundwater Management Plans

The evaluation of Project consistency with Water Quality and Sustainable Groundwater Management Plans is based on a summary of the preceding analyses of Project impacts on water quality and groundwater resources. The summary identifies the applicable plans, the regulatory mechanisms for meeting the standards in those plans, and the Project characteristics that conform to those regulatory standards.

Project Design Features

There are no proposed project design features with regard to hydrology and water quality.

Analysis of Project Impacts

Threshold H/WQ-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Impact Analysis

Construction

Construction of the Project would consist of the removal of the existing site buildings and infrastructure, followed by the construction of buildings, utilities, and underground parking garages, all of which would include ground disturbing activities, such as demolition, excavation, trenching, and grading. The use of construction-related equipment and materials would require the use of fuels and oils, paints and thinners, solvents and cleaning solutions, and concrete and asphalt, all commonly used for construction. Sediment and other pollutants could be mobilized and transported off-site by stormwater runoff, potentially degrading the water quality in off-site drainages and surface water bodies such as Ballona Creek.

Because the overall footprint of construction activities would exceed one acre, the Project would be required to comply with the *NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit) and the local stormwater ordinances, which are described above in *Regulatory Framework*, and in more detail in the Hydrology Report in Appendix I of this Draft EIR. These State and local requirements were developed to ensure that stormwater runoff is controlled on construction sites. The Construction General Permit requires preparation and implementation of a SWPPP, which requires applications of BMPs to control runon and runoff from construction work sites. The BMPs would include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures that would substantially reduce or prevent erosion from occurring during construction.

The construction of the underground parking garages would require excavation to about 50 feet bgs, which would be to a level below the shallowest observed depth to groundwater of 28.8 feet bgs. Consequently, the excavation would require dewatering to facilitate construction of the parking garages and foundations for the buildings. The inappropriate discharge of the dewatering effluent could release and transport sediments and other pollutants, potentially degrading the water quality in off-site drainages and surface water bodies such as Ballona Creek. As required by applicable NPDES permitting requirements and LARWQCB Waste Discharge requirements (WDRs) for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties, or any other appropriate WDR permits identified by the LARWQCB, and local regulations, the discharger (i.e., the contractor conducting the dewatering activities) must demonstrate that the discharge of dewatering effluent shall not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters, and perform reasonable potential analysis using a representative sample of groundwater or wastewater to be discharged. The discharger would be required to provide a feasibility study on

conservation, reuse, and/or alternative disposal methods of the dewatering effluent and provide a flow diagram of the influent to the discharge point. With compliance with existing regulations, impacts associated with the discharge of dewatering effluent during construction would be less than significant.

As discussed in Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR, benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above drinking water standards (also referred to as maximum contaminant levels (MCLs). As discussed above, compliance with applicable NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles County, or any other appropriate WDR permits identified by the LARWQCB, would require the discharger to test for any suspected pollutants and either treat the pollutants such that the dewatering effluent water quality is acceptable for the receiving waters or arrange for an alternate disposal method. Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards. Nonetheless, if contaminated soils or groundwater are encountered during construction excavation activities and not properly handled or disposed of, there could potentially be adverse impacts to surface or groundwater quality. As such, this is considered a potentially significant impact.

In addition, the Applicant would be required to comply with grading permit regulations in both cities, which include standard erosion control measures and inspections to reduce sedimentation and erosion. Note that such measures would also be included in the construction SWPPP. If construction should occur during the rainy season (October 1 to April 14), a wet weather erosion control plan would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the City of Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities, cited above, and be adopted into the facility SWPPP. As discussed above, BMPs for non-stormwater discharge management and materials management would be incorporated into the SWPPP. It is noted, however, that surface non-stormwater runoff potential would be minimal, if it occurs at all. Water used for dust control would only be applied to the extent needed and would not result in runoff.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous waste, such as those applicable provisions of 22 CCR, would reduce the potential for construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Implementation of the BMPs in the SWPPP in accordance with LARWQCB's discharge requirements would further ensure that any discharge of groundwater during construction would not adversely impact groundwater quality.

Based on the above, excavation activities during construction could encounter contaminated soils or groundwater, which if not properly handled or disposed of, could potentially result in adverse impacts to surface or groundwater quality. As such, impacts related to violations of water quality standards or waste discharge requirements would be potentially significant.

Operation

Stormwater discharge is generated by rainfall that runs off the land and impervious surfaces, such as paved streets, parking lots, and rooftops. Stormwater discharge may include pollutants of concern, which are expected to be generated by the Project that could affect stormwater quality. During Project operation, pollutants of concern within stormwater runoff may include, but are not limited to, pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil and grease, and trash. This stormwater runoff can flow directly into storm drains and continue untreated. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, plant and animal habitats, and the water quality in off-site drainages and surface water bodies such as Ballona Creek.

The LID analysis characterized the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project, identified BMPs proposed to address the quality of stormwater runoff from the Project Site under the Project, and determined whether the proposed BMPs would comply with existing regulations which have been formulated to avoid significant surface water quality impacts associated with new development. The City of Los Angeles's LID Manual and the Culver City SUSMP prioritize the selection of BMPs used to comply with stormwater mitigation requirement. The order of priority is as follows:

1. Infiltration systems
2. Stormwater capture and use
3. High efficient biofiltration/bioretention systems
4. Combination any of the above

The Hydrology Report concluded that the preferred method of on-site stormwater infiltration is not feasible at the Project Site. The upper 20 feet of soils strata consists largely of clays and silts, which are relatively impervious. More granular materials, which are adequate for infiltration, were found below a depth of 20 feet.[35] However, groundwater has been observed at the site as shallow as 28.8 feet bgs. Regulations require that a minimum of 10 feet vertical separation be maintained between the bottom of stormwater infiltration systems and the groundwater level. This required separation would not permit infiltration within the granular soils strata. This determination was made by reviewing boring logs performed on both the City of Los Angeles and Culver City portions of the Project Site. This indicates that infiltration would be infeasible on both parcels. Therefore, the Project would use stormwater capture and reuse systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. The Project's BMPs and

[35] Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

capture and reuse system (described below) would be designed to comply with the LID standards, including capture and treatment of the 85th percentile storm event volume or 0.75-inch storm event.

The proposed condition of the Project Site would be divided into two drainage areas as represented by Figures 3 and 4 of the Hydrology Report in Appendix I. In existing conditions, stormwater was allowed to flow between both jurisdictions whereas the post-developed condition will contain stormwater in its respective jurisdiction. The post-development condition will manage stormwater flow locally through building roof drains and controlled surface flow areas into on-site area drains, which will be pre-treated with a hydrodynamic separator to clean the water of particles and contaminants, such as sediment, oil and grease, pesticides and other toxics, and then subsequently stored in two basement cisterns (one in each parcel) for irrigation purposes. **Table 4.8-2,** *Proposed Drainage Conditions During 85th Percentile Storm Event***,** shows the peak flow stormwater runoff rate calculations for the 85th percentile storm event volume. The Project Site comprises 1.63 acres within Culver City and 2.83 acres within the City of Los Angeles. Based on these sizes, the LID system for the Culver City portion would be required to mitigate up to 33,903 gallons of runoff generated by the design storm event. The LID system for the Los Angeles portion would be required to mitigate up to 69,621 gallons of runoff generated by the design storm event. Collectively, the Project would be required to mitigate 103,524 gallons.

TABLE 4.8-2
PROPOSED DRAINAGE CONDITIONS DURING 85TH PERCENTILE STORM EVENT

Drainage Area (#)	Drainage Area (acres)	Impervious Area (%)	85th Percentile Storm Event (gallons)
DA1 (to Venice Blvd.)	2.83	89.8	33,903
DA2 (to National Blvd)	1.63	72.2	69,621
Total	**4.46**	**83.4**	**103,525**

NOTES: DA = drainage area.
SOURCE: KPFF Consulting Engineers, 2022.

Consistent with applicable LID requirements, capture and reuse systems sized to capture the above-calculated 85th percentile storm event would be utilized on both the City of Los Angeles and Culver City parcels. The combined capacity between the two capture and reuse systems would be 103,524 gallons (sum of the previously cited 33,903 and 69,621 gallons).

When the Project's cistern system is at capacity, water would be prevented from entering the cistern but would continue to pass through the filtration system. Following filtration, it would be redirected back to the curb faces on Venice Boulevard, National Boulevard, and Washington Boulevard, where it would be captured in the existing street catch basins and ultimately discharged, having been cleaned and filtered, into Ballona Creek.

Under existing conditions, stormwater discharges from the Project Site as untreated water to street catch basins into the storm drain system and ultimately into Ballona Creek. Because there is no existing treatment system in place at the Project Site, upon Project buildout, fewer pollutants would be transported through the off-site stormwater conveyance systems into Ballona Creek, which flows

to the Pacific Ocean. Since there are currently no existing on-site BMPs, stormwater runoff during post-Project conditions would result in improved surface water quality.

Source control measures per each City's LID requirements, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would also reduce surface water quality impacts and would prevent pollutants from entering the surface water flow system, as well as to groundwater by percolation within landscaped areas. Any on-site use of hazardous materials to be used in association with operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping, as well as fuel storage associated with maintenance and/or emergency equipment, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, such that no hazardous materials be exposed to or otherwise would adversely impact groundwater quality (see Section 4.7, *Hazardous and Hazardous Materials*, of this Draft EIR, for discussion on managing hazardous materials).

Due to the incorporation of the required LID BMPs, operation of the Project would not result in discharges that would cause (1) pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Accordingly, operation of the Project would not result in discharges that violate any water quality standards or waste discharge requirements; rather, it would improve water quality compared to existing conditions. Therefore, impacts resulting from Project operation would be less than significant with respect to surface water quality and groundwater quality.

Mitigation Measures

As discussed above in the Construction subsection, excavation activities during construction could encounter contaminated soils or groundwater, which if not properly handled or disposed of, could potentially result in adverse impacts to surface or groundwater quality. As such, construction-related impacts related to violations of water quality standards or waste discharge requirements would be potentially significant. Implementation of Mitigation Measure HAZ-MM-2, *Soil and Groundwater Management Plan*, in Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR, would reduce this impact to less than significant. No additional construction-related mitigation measures are necessary.

Operational water quality impacts were determined to be less than significant. Therefore, no mitigation measures are required for Project operations.

Level of Significance after Mitigation

As discussed in Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR, to ensure the proper management of contaminated soils and groundwater, the Project would be required to implement Mitigation Measure HAZ-MM-2, which requires the preparation and implementation

of a soil and groundwater management plan prior to and during Project construction. Groundwater management is included because three levels of below grade parking would be constructed, which would encounter groundwater known to be contaminated. These mitigation measures would reduce impacts related to hazardous materials, as well as potentially significant impacts to surface or groundwater quality to a less than significant level.

Therefore, with implementation of Mitigation Measure HAZ-MM-2 and compliance with NPDES and WDR requirements and City grading regulations, Project construction would not result in discharge that would cause (1) pollution which would alter the quality of the water of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Accordingly, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Ballona Creek.

Water quality impacts during operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level during operation remains less than significant.

Threshold H/WQ-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact Analysis

Construction

Construction activities for the Project would include demolition of the existing structures and hardscape, mass excavation, and grading, followed by construction of the new structures. As previously noted, the observed depth to groundwater has been as shallow as 28.8 feet bgs. The excavation depth would be to approximately 50 feet bgs for the lowest subterranean parking level. Consequently, groundwater is anticipated to be encountered during construction and temporary dewatering is likely to be required, which could affect groundwater supplies.

To facilitate excavation to depths below groundwater, dewatering may be necessary. Temporary pumps and filtration would be used in compliance with all applicable regulations and requirements, including NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties, or any other appropriate WDR permits identified by the LARWQCB, and local regulations. Temporary dewatering would occur during the construction of the foundations and basement levels until it is able to withstand hydrostatic forces. The system would then be turned off and the groundwater table would stabilize again after turning the temporary dewatering system off. The dewatering effluent would be disposed to the municipal storm drain system under the NDPES permit and requirements related to construction and discharges from dewatering

operations. As the groundwater table would be allowed to stabilize and recharge during construction after the basement levels can withstand hydrostatic forces, dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction.

Based on the above, the Project construction would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management of the basin, and impacts would be less than significant.

Operation

The Project would include two underground parking garages that would extend to 50 feet bgs, which would be below the shallowest observed depth to groundwater of 28.8 feet bgs. As described in the Hydrology Report (see Appendix I of this Draft EIR),[36] where subterranean levels extend below the groundwater elevation, the subterranean levels of structures would need to be waterproofed and designed to resist the hydrostatic pressures imposed on the floor slabs and walls. The Applicant intends to design the underground floors and slabs to withstand hydrostatic pressure and not require permanent dewatering. The City of Los Angeles and Culver City will likely require a standard wall backdrain and subdrain system below the lowest floor to accommodate nuisance and locally perched groundwater. With proper design of the underground parking garages, permanent dewatering would not be required and would not impact groundwater supplies.

The Project Site is currently 95.5 percent impervious. Most stormwater that currently falls on the Project Site flows into the municipal storm drain system and eventually to Ballona Creek. The Project Site currently has a minimal groundwater recharge potential because relatively small amounts of stormwater infiltrate into the subsurface due to prevalence of impervious surfaces. With development of the Project, the amount of impervious area on the Project Site would decrease from 95.5 percent to 83.4 percent. This would incrementally increase the amount of stormwater that falls on the Project Site and infiltrates down to groundwater, thus incrementally increasing groundwater supplies.

Currently, landscaping on the Project Site is irrigated using the municipal water supply, some of which is derived from groundwater supplies. The Project would capture, treat, and store up to 103,525 gallons of stormwater at a time from the developed portions of the Project Site through the stormwater LID capture and reuse cistern system, which would then use the treated stormwater for irrigation on the Project Site. This would decrease the use of groundwater supplies.

The Project would not include injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system, and would not affect groundwater supplies.

[36] KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022. Provided as Appendix I of this Draft EIR.

Based on the analysis above, the operation of the Project operation would not significantly decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, and impacts would be less than significant.

Mitigation Measures

Impacts regarding groundwater recharge, supplies, and management were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding groundwater recharge, supplies, and management were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold H/WQ-3: Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on- or off-site.

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

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

iv. impede or redirect flood flows.

Impact Analysis

Construction

Construction activities would alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Changes in the drainage pattern could result in on- or off-site flooding, or exceeding the capacity of existing or planned stormwater drainage systems.

Erosion or Siltation On- or Off-Site

The Project would include excavation activities to a maximum depth of approximately 50 feet bgs. These activities could temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be temporarily subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in stormwater runoff.

As discussed under Threshold H/WQ-1, since the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows, prevent pollution, and avoid on- or off-site flooding. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES Construction General Permit and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Also, if construction should occur during the rainy season (October 1 to April 14), a wet weather erosion control plan would be prepared pursuant to SWPPP requirements. Construction activities would be temporary, and flow directions and runoff volumes during construction would be controlled through implementation of the SWPPP.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, control runoff from the construction site, and avoid on- and off-site flooding during the construction period. Lastly, construction activities and any associated hydrology (drainage) impacts would be temporary. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation and implementation of a SWPPP and BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation. Similarly, adherence to standard compliance measures in construction activities would avoid flooding, avoid substantially increasing the amount of surface water flow from the Project Site into a water body, and avoid a permanent, adverse change to the movement of surface water. Therefore, Project construction would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

Increase Rate or Amount of Surface Runoff

Erosion control measures specified under the Project's required SWPPP and BMPs would control surface runoff and prevent uncontrolled storm water runoff from the Project Site during Project construction. In addition, water used for dust control would be mechanically and precisely applied in quantities that would not create surface runoff. No other construction activities would require an increase in the use of water that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. As such, the Project's construction-related impacts with respect to the rate and amount of surface runoff would be less than significant.

Exceed Capacity of Existing or Planned Stormwater Drainage Systems

During construction-related ground-disturbing activities, the Project Site would be temporarily more permeable compared to existing conditions, which would increase on-site infiltration and reduce runoff. As the construction site would be greater than one acre, the Project would be required to comply with the NPDES Construction General Permit stormwater requirements. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs to be implemented during construction to manage runoff flows to ensure they are within the capacity of existing or planned stormwater drainage systems. In addition, the Project would be

required to comply with all applicable grading permit regulations that require necessary measures, plans, and inspections to control runoff from the construction site and avoid on- and off-site flooding during the construction period, which would further ensure no capacity exceedances occur within the stormwater drainage systems. Compliance with the applicable regulatory requirements would ensure the Project does not provide substantial additional sources of polluted runoff during construction to existing or planned drainage systems and the impacts would be less than significant.

Impede or Redirect Flood Flows

As discussed in the Environmental Setting, the Project Site is not located within 100-year flood zone as mapped on Federal Flood Hazard Boundary or FIRMs or other flood hazard delineation maps and would not impede or redirect flood flows. Regardless, construction BMPs as part of the SWPPP would include measures that prevent any water from off-site sources from freely flowing into or across the Project Site. The existing drainage patterns in and around the Project Site would not be materially altered in a manner that would impede or redirect flood flows. As such, construction of the Project would not change the direction of flow of, or impede, any floodwater from off-site sources. Impacts with respect to impediment or redirection of flood flow would be less than significant.

Operation

Erosion or Siltation On- or Off-Site

As discussed under Threshold H/WQ-1, the Project would comply with LID requirements to ensure that stormwater treatment with operational BMPs would control pollutants associated with storm events up to the 85th percentile storm event.

Drainage patterns for the Project Site would be changed because runoff would no longer be entirely discharged to the municipal storm drain system, as it is now. As part of the City of Los Angeles LID requirements and the Culver City SUSMP requirements to manage post-construction stormwater runoff, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site to collect roof and site runoff and direct stormwater through a series of underground storm drainpipes to the underground cisterns for later use as landscaping water. The Project would reduce the existing 50-year frequency storm event (Q50) flow of 13.39 cfs cited in Table 4.8-1 to a Q50 flow of 13.33 cfs as shown in **Table 4.8-3**, *Proposed Drainage Conditions During 50-Year Storm Event (Q50)*, which is an incremental decrease of 0.06 cfs. Stormwater in excess of the volume captured by on-site LID BMP facilities would be discharged to the existing off-site municipal storm drain system, and ultimately into the Ballona Creek, as it does under existing conditions. Accordingly, implementation of the proposed LID BMPs for both cities and compliance with Culver City SUSMP requirements would reduce the volume of stormwater runoff discharged from the Project Site and prevent on- or off-site erosion of siltation, resulting in an impact of less than significant.

TABLE 4.8-3
PROPOSED DRAINAGE CONDITIONS DURING 50-YEAR STORM EVENT (Q50)

Drainage Area (#)	Drainage Area (acres)	Impervious Area (%)	Q50 Peak Flow (cfs)
DA1 (to Venice Blvd.)	2.83	89.8	8.48
DA2 (to National Blvd)	1.63	72.2	4.85
Total	**4.46**	**83.4**	**13.33**

NOTES: DA = drainage area; cfs = cubic feet per second.
SOURCE: KPFF Consulting Engineers, 2022.

Increase Rate or Amount of Surface Runoff or Flooding

As previously discussed, the Project Site is not located in a 100- or 500-year floodplain. As discussed above, during the 50-year design storm, the peak flow of stormwater runoff from the Project would incrementally decrease from 13.39 cfs cited in Table 4.8-1 to 13.33 cfs cited in Table 4.8-3. This incremental reduction would decrease the rate and amount of runoff from the existing drainage pattern of the site or area. In addition, the proposed Project drainage conditions will decrease the impervious area percentage from 95.5 percent to 83.4 percent (see Tables 4.8-1 and 4.8-3, respectively) and increase the volume of storm water infiltrated on-site. Therefore, the Project would not alter the course of a stream or river or increase the amount of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Thus, impacts would be less than significant.

Exceed Capacity of Existing or Planned Stormwater Drainage Systems

As discussed above under Threshold H/WQ-1 and shown in Figures 3 and 4 in the Hydrology Report (provided in Appendix I of this Draft EIR), Project Site runoff patterns would be altered due to Project implementation (including BMPs), as the required first flush runoff and 50-year storm events would be captured and reused on-site. As previously discussed, the on-site stormwater conveyance system, together with the BMPs would capture and treat the 50-year storm events and the first flush of rainfall and serve to reduce the volume of runoff discharged from the Project Site to the municipal storm drain system during storm events from 13.39 cfs to 13.33 cfs. Consequently, the volume of flow to stormwater drainage systems would be reduced, and no new off-site storm drainage infrastructure would be needed based on the on-site improvements, resulting in an impact that would be less than significant.

Impede or Redirect Flood Flows

As previously discussed, the Project Site would not be located within a 100- or 500-year flood zone as mapped on federal Flood Hazard Boundary or FIRMs or other flood hazard delineation maps and would not impede or redirect 100-year flood flows. The Project would not change the direction of flow or impede any floodwater from off-site sources. Therefore, Project operation would not substantially alter the existing drainage pattern of the Project Site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows, and impacts would be less than significant.

Mitigation Measures

Impacts on drainage patterns that would cause increased siltation and flooding on- or off-site, create or contribute to the exceedance of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts on drainage patterns that would cause increased siltation and flooding on- or off-site, create or contribute to the exceedance of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold H/WQ-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

As discussed in the Initial Study (Appendix A of this Draft EIR), the Project is not located in 100- or 500-year flood, tsunami, or seiche zones and would not release pollutants due to Project inundation. Impacts would be less than significant with respect to Threshold H/WQ-4 and no further analysis is required.

Threshold H/WQ-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Analysis

Construction

The Project falls under the jurisdiction of the LARWQCB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The LARWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB and the local RWQCB, which in this area is the LARWQCB. In addition, the Project Site is located within the Basin 4-011.01, Coastal Plain of Los Angeles–Santa Monica, which is a medium-priority groundwater basin, requiring the formation of a groundwater sustainability agency and implementation of a GSP that includes objectives of maintaining groundwater quality.

As discussed in Impact H/WQ-1, since the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES Construction General Permit, which would be under the jurisdiction of the LARWQCB. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows, prevent pollution, and avoid on- or off-site flooding during construction. The NPDES Construction General Permit and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site, so runoff does not impact off-site drainage facilities or receiving waters with

sediment or other pollutants. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, control runoff from the construction site, and avoid on- and off-site flooding during the construction period. Compliance with the Construction General Permit and City grading permits during construction would prevent degradation of water quality, which would be consistent with the objectives of the Basin Plan and the GSP, resulting in a less than significant impact.

Operation

The County of Los Angeles and the cities of Culver City and Los Angeles are co-permittees under the Los Angeles County NPDES MS4 Permit, described above in the *Regulatory Framework*, and, as such, are required to implement development planning guidance and control measures regarding water quality impacts from new development.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of stormwater management and includes a LID Plan that designates BMPs that must be used by projects to address water infiltration, filtering, treatment, and peak-flow discharge. The cities support the requirements of the Los Angeles County MS4 Permit through the County's Hydrology Manual, City of Los Angeles LID Handbook, Culver City SUSMP, and other local regulations that provide guidance to developers of newly developed projects for compliance with regulatory standards. The Project is also within the jurisdiction of the Water Quality Compliance Master Plan for Urban Runoff developed by the City of Los Angeles Department of Public Works and the Stormwater Quality Master Plan developed by Culver City, both of which include descriptions of BMPs required by each city for stormwater quality management.

The Project would install building roof drain downspouts, catch basins, and planter drains to collect roof and site runoff and direct stormwater via a series of underground storm drainpipes to two underground cisterns. Water captured in the cisterns would be stored and used to irrigate the on-site landscaping. This storm water capture and use would be consistent with the Basin Plan and the GSP by using storm water for landscaping irrigation instead of using the municipal water supply, as is done now.

The Project's potential impacts regarding water quality are evaluated under Threshold H/WQ-1 above. As indicated in that analysis, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance requirements. The existing Project Site currently does not implement BMPs and has no means for use or treatment of stormwater runoff. Therefore, with implementation of the LID BMPs, the proposed Project would substantially reduce the volume and improve the quality of stormwater runoff discharged from the Project Site. With the implementation of the Project's on-site storm water capture and use system, the Project would have less-than-significant impacts on both surface and groundwater quality during operation.

The Project's potential impacts regarding groundwater supplies and groundwater recharge are evaluated above under Threshold H/WQ-2. As indicated, the Project would have a less-than-significant impact in that the amount of impervious surface would be reduced, and landscape

irrigation water would be from storm water instead of the municipal water supply. As further indicated in those analyses, with Project implementation, the stormwater runoff quality would be improved as compared to existing conditions.

Therefore, in conjunction with the implementation of necessary BMPs to support the applicable plans, the Project would not conflict with or obstruct implementation of a water quality control plan (i.e., the Basin Plan) or sustainable groundwater management plan (i.e., the GSP) during operation of the Project, resulting in a less than significant impact.

Mitigation Measures

Impacts regarding a water quality control plan or sustainable groundwater management plan were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding a water quality control plan or sustainable groundwater management plan were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold H/WQ-6: Would the Project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?

Impact Analysis

Surface runoff on the Project Site would be collected by building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would then convey flows to underground cisterns for later use as landscaping water. As discussed above, the Project would reduce the volume of runoff discharged from the Project Site to the municipal storm drain system during storm events from 13.39 cfs to 13.33 cfs. Consequently, the volume of flow to stormwater drainage systems would be reduced, and no new off-site storm drainage infrastructure would be needed based on the on-site improvements. As such, the Project would not result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

Mitigation Measures

Impacts regarding new or expanded stormwater drainage facilities were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding new or expanded stormwater drainage facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

This section presents an analysis of the cumulative effects of the Project in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Significant cumulative impacts related to hydrology and water quality could occur if the incremental impacts of the Project combined with the incremental impacts of one or more of the 52 related projects identified on Table 3-1 and shown on Figure 3-1 in Chapter 3, *Environmental Setting*, of this Draft EIR.

As previously discussed, the Project would have no impact with respect to tsunamis, seiches. Accordingly, the Project could not contribute to cumulative impacts related to these topics and are not discussed further.

As with the Project, the related projects are located in urbanized areas, which include mostly impermeable hard-surface project sites. Accordingly, the potential for the related projects to generate a substantial amount of new impermeable surfaces is limited. The related projects would also be subject to the same regulatory requirements as the Project, including, where applicable, the NPDES Construction General Permit, NPDES MS4 permit, NPDES Waste Discharge Requirements permits (for facilities that generate regulated waste), and LID requirements for related projects within both cities, which would require the related projects to capture and manage their stormwater in accordance with LID requirements. Each city would also review each future development project on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available to accommodate each related project's stormwater runoff. Accordingly, the related projects are not anticipated to result in cumulatively considerable impacts with respect to hydrology and drainage quantities/patterns. Moreover, as shown above, the Project would decrease stormwater flows from the Project Site through storm water capture and reuse. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts on hydrology and drainage patterns would be less than significant.

All related projects that anticipate new construction have the potential to contribute to pollutant loading during construction and operation, which could potentially result in cumulative impacts to water quality. However, as with the Project, all new construction would be subject to NPDES Construction General Permit and Waste Discharge Requirements (if applicable) permits during construction and, where applicable, dewatering activities. Each related project greater than one acre in size would be required to develop a SWPPP for construction and grading activities. In addition, all new construction plans would be evaluated individually to determine the appropriate BMPs and treatment measures to minimize the related projects impacts to water quality. Operation of the related projects would also be subject to applicable LID requirements, including implementation of operational BMPs to address the quality of water runoff from surfaces, such as driveways, parking lots, and parking structures. Pursuant to each city's LID requirements, related projects would be required to implement LID BMPs through one or more of each city's preferred improvements, including on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible. With compliance to existing applicable regulations, such as each city's LID requirements, the related projects would also be unlikely to cause or increase surface or

groundwater contamination. In cases where the related projects would require dewatering during excavation, groundwater dewatering, treatment, and disposal would be conducted in accordance with NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties, or any other appropriate WDR permits identified by the LARWQCB, and local regulations. Compliance with these regulations would ensure less-than-significant effects on surface water, as well as groundwater quality. Therefore, with adherence to applicable regulations and implementation of Mitigation Measure HAZ-MM-2 (temporary construction only), the Project's contribution to cumulative impacts would not be cumulatively considerable during construction, and cumulative impacts during construction on water quality would be less than significant. Also, during operation, with adherence to applicable regulations the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts during operation on water quality would be less than significant.

As described above in Threshold H/WQ-1, the Project would implement Mitigation Measure HAZ-MM-2 (during construction only) requiring preparation and implementation of a Soil and Groundwater Management Plan to address the potential to encounter contaminated soil and/or groundwater during excavation activities. As with the Project, related projects would also implement Soil and Groundwater Management Plans to address the potential to encounter contaminated soil and/or groundwater during excavation activities. These plans would be consistent with applicable regulatory requirements that would ensure less than significant impacts on surface water and groundwater quality during construction.

Furthermore, as demonstrated above, through compliance with applicable regulatory requirements via site-specific stormwater management and BMPs, the Project and related projects would not substantially conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during construction or operation. Also, as discussed above, given the urbanized nature of both cities and the surrounding area, the potential for the related projects to generate a substantial amount of new impermeable surfaces and thereby affecting the groundwater table is limited. None of the related projects are known to include significant quantities of permanent, ongoing groundwater withdrawal, but some would likely include infiltration as a means of LID compliance, where feasible and possible. Based on the above, with adherence to applicable regulations, the Project's contribution to cumulative impacts would not be cumulatively considerable during construction, and cumulative impacts during construction regarding the Project conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan would be less than significant. In addition, during operation, with adherence to applicable regulations the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts during operation regarding the Project conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan would be less than significant.

With regards to pollutant releases during flooding, the Project Site and the areas immediately surrounding the Project Site are not located within a 100- and 500-year floodplain and would not increase runoff or change drainage patterns that would result in off-site flooding. As such, the

Project's contribution would not be cumulatively considerable, and cumulative impacts with respect to flooding would be less than significant.

The Project Site is not located within an inundation hazard area related to upstream dams. In addition, numerous dam safety regulations are in place to safeguard against dam failure. If a breach were to occur at the dams, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Water flows, were it to reach the Project Site and related project sites, would generally flow along roadways adjacent to or within the vicinity of the Project Site and related project sites. Regardless, the Project and related projects would actively maintain their respective project sites with their own stormwater management systems and regular implementation of BMPs to minimize pollutants within those sites in compliance with applicable regulatory requirements. The nature of pollutants at the related project sites would be typical of other developments within the dam inundation area. Thus, in the unlikely event of on-site inundation, the Project and related projects would not result in the release of significant types or quantities of pollutants. Based on the above, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts with respect to release of pollutants due to inundation by flooding, tsunami, or seiche would be less than significant.

Overall, based on the above, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts on hydrology and water quality would be less than significant, with inclusion of mitigation addressing the Project's construction-related water quality impacts.

Mitigation Measures

Cumulative impacts regarding construction-related water quality were determined to be less than significant with compliance with existing regulations and implementation of Mitigation Measure HAZ-MM-2 (temporary construction only). Construction-related hydrology impacts and operational hydrology and water quality impacts would be less than significant. Therefore, no additional mitigation measures are required.

Level of Significance after Mitigation

With compliance with existing regulations and implementation of Mitigation Measure HAZ-MM-2 (temporary construction only), cumulative impacts regarding construction-related water quality were determined to be less than significant. Therefore, no additional mitigation measures were required or included, and the impact level remains less than significant.

Construction-related hydrology impacts and operational hydrology and water quality impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level for these issues remain less than significant.

4.9 Land Use and Planning

4.9.1 Introduction

Development on the Project Site is guided by land use policies and regulations set forth in state, local, and regional plans and local zoning regulations applicable to Culver City and the City of Los Angeles. This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Section 4.2, *Air Quality*, addresses relevant air quality plans and policies; Section 4.6, *Greenhouse Gas Emissions*, discusses relevant plans and policies to reduce greenhouse gas emissions; and Section 4.12, *Transportation*, discusses consistency with transportation plans.

4.9.2 Environmental Setting

Regulatory Framework

Following is a summary of the applicable state, regional, and local and regulatory land use plans, policies, and ordinances that apply to development at the Project Site. Specific provisions of these documents that pertain to land use are evaluated under the *Environmental Impacts* subsection for consistency with the Project. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- Los Angeles County Metropolitan Transit Authority Active Transportation Strategic Plan
- Culver City General Plan
- Culver City General Plan Land Use Element
- Culver City General Plan Open Space Element
- Culver City Municipal Code
- Culver City Bicycle & Pedestrian Action Plan
- Culver City Urban Forest Master Plan
- Culver City Redevelopment Plan for the Culver City Redevelopment Project
- Culver City Design for Development Exposition Light Rail Transit and Station Area
- Culver City TOD Visioning Study and Recommendations
- Los Angeles General Plan
- Los Angeles General Plan Framework Element

- Los Angeles General Plan Transportation Element (Mobility Plan 2035)
- Los Angeles General Plan Conservation Element
- Los Angeles General Plan Health and Wellness Element
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay (CPIO)
- Los Angeles Municipal Code
- Los Angeles Exposition Corridor Transit Neighborhood Plan
- Los Angeles Citywide Design Guidelines

State

California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

Regional

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains

baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[1] by six percent and the share of new job growth in HQTAs by 15 percent.

Los Angeles County Metropolitan Transportation Authority Active Transportation Strategic Plan

The Los Angeles County Metropolitan Transportation Authority (Metro) is the transportation planning agency for Los Angeles County. Metro develops and oversees transportation plans, policies, and funding programs to address mobility, accessibility, and related environmental issues. Metro directly operates bus, light rail, heavy rail, and bus rapid transit services. Relevant to the Project is the Active Transportation Strategic Plan, discussed below.

Metro's Active Transportation Strategic Plan (ATSP), which is still in the preliminary development phase and is not yet applicable to the Project, identifies strategies to increase walking, biking, and transit use in Los Angeles County.[2] Specifically, the ATSP focuses on improving first and last mile access to transit stations to increase transit ridership, and proposes a regional network of active transportation facilities, such as shared use paths and on-street bikeways. The ATSP includes the following objectives:

- Identify improvements that increase first last mile access to transit by active modes.
- Work with partners to create a regional active transportation network.
- Develop supporting programs and policies related to education, enforcement, encouragement, and evaluation.
- Provide guidance for setting regional active transportation policies and guidelines to guide future investment.
- Develop a funding strategy and explore opportunities to expedite implementation.

[1] HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minute or less service frequency during peak commuting hours.

[2] Los Angeles Metropolitan Transit Authority (Metro), Active Transportation Strategic Plan, (ATSP), in development, https://www.metro.net/projects/active-transportation-strategic-plan-atsp/ Accessed July 13, 2022.

The ATSP provides the following regional active transportation network guiding principles:

- Connect cities and communities
- Serve desire lines
- Serve Main Street
- Harness continuous rights-of-way
- Link to transit
- Address existing safety problems
- Design for all ages and abilities

The ATSP includes several recommendations to improve first last mile access to transit stations, such as bike share stations and bicycle services, sidewalk widening or addition, enhanced pedestrian crossings, enhanced bicycle facility, traffic calming measures, enhanced bus waiting areas, street furniture, landscaping and shade, lighting, and park-and-ride lots.

Local

City of Culver City

Culver City General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan includes nine elements that have been updated at various points between 1968 and 2014. The City's General Plan includes the Land Use Element (adopted in 1996 and amended through 2004), the Circulation Element (amended through 1995), the Housing Element (approved in 2014), the Open Space Element (approved in 1996), the Noise Element (approved in 1996), Conservation Element (adopted in 1973), Seismic Safety Element (adopted in 1974), Public Safety Element (adopted in 1975), and Recreation Element (adopted in 1968). The City's General Plan elements and policies relevant to the topic of land use and open space are discussed below. Other General Plan elements and policies related to topics addressed in this Draft EIR are discussed in applicable sections in Chapter 4, *Environmental Impact Analysis*. The Circulation Element is addressed in Section 4.12, *Transportation,* and Noise and Public Safety Elements are addressed in Section 4.10, *Noise*, Section 4.11.1, *Public Services – Fire Protection*, and Section 4.11.2, *Public Services – Police Protection,* of this Draft EIR.

Culver City General Plan Land Use Element

The Culver City General Plan Land Use Element designates general distribution, intensity, and development policies regarding residential, commercial, industrial, open space, and institutional uses in the city. **Figure 4.9-1**, *Project Site and Surrounding Land Use Designations*, illustrates the Culver City General Plan's designated land use for the Culver City portion of the Project Site and the surrounding area.

SOURCE: Nearmap, 2021; City of Culver City/Los Angeles; ESA, 2022

Crossings Campus

Figure 4.9-1
Project Site and Surrounding Land Use Designations

ESA

In order to support Culver City's vision for the future, the Land Use Element is built around the following goals:

- Economic vitality that serves the community and protects the quality of life,
- An open space, urban forest, urban design network that links neighborhoods and businesses and instills civic pride;
- A community that provides recreational, historical, and cultural opportunities;
- Ample and efficient City services and infrastructure.

The General Plan land use designation of the Culver City component of the Project Site is General Corridor Commercial. Within Culver City, Washington Boulevard is primarily designated as General Corridor Commercial and, in the Project area, this designation encompasses both sides of Washington Boulevard between Helms Avenue and Robertson Boulevard. Both sides of National Boulevard are also designated as General Corridor Commercial along the Project Site and south to a point at which National Boulevard turns to the southeast. At this point, the south side of National Boulevard is designated as Industrial. A Low Density Residential (two-family) residential neighborhood is generally located to the south of the Industrial designated area of National Boulevard near the Project Site. A Medium Density Residential land use designation is located south of Washington Boulevard's General Corridor Commercial designation to the southeast of the Project Site on both sides of Helms Avenue. The General Corridor Commercial designation allows a range of small- to medium-scale commercials uses, with an emphasis on community-serving retail to which patrons often travel by car. The General Corridor Commercial designation is intended to support desirable existing and future neighborhood and community servicing commercial uses, and limited medium-density housing opportunities compatible with adjacent residential neighborhoods. The designation is characterized by areas with a two- to three-story height limit, recognizing the proximity to residential neighborhoods and the other Commercial Corridor designated areas with a height limit up to 56 feet.

Culver City General Plan Open Space Element

The intent of the Open Space Element is to protect, expand, and enhance, visible and usable open space resources. The Open Space Element identifies existing City resources; provides open space definitions and standards; and presents goals, objectives and open space policies.[3] Objective 1 addresses open space protection and acquisition, Objectives 2 and 3 address active and passive recreation, respectively, and Objective 4 addresses natural areas. Policy 2.C of the Open Space Element encourages private sponsorship of bikeway or public park land improvements in exchange for development incentives. In addition, Policy 3.E is to provide seating, bike rack, and drinking fountains in passive recreation areas. The Open Space Element also addresses the streetscape, which is implemented through the City's Bicycle & Pedestrian Action Plan (Action Plan), the Urban Forest Master Plan, and the Municipal Code.

[3] City of Culver City, General Plan Open Space Element, adopted 1996, amended through 2004, https://www.culvercity.org/home/showpublisheddocument?id=796. Accessed January 17, 2022.

Culver City Municipal Code

The Culver City Zoning Code (Title 17 of the Culver City Municipal Code [CCMC]) implements the policies of the General Plan by classifying and regulating the uses of land and structures within the City. As shown on **Figure 4.9-2**, *Zoning on the Project Site and in the Surrounding Area*, below, the zoning designation of the Culver City portion of the Project Site is Industrial General (IG) District but carries a General Plan designation of General Corridor. According to CCMC Section 17.230.010.B, the IG Zone applies to areas appropriate for a wider variety of industrial use than that permitted under the Light Industrial (IL) Zone. These include outdoor activities, but no heavy industry. Allowed uses include chemical, food and beverage, paper product, and machinery manufacturing; stone, glass, metal, and plastics manufacturing; media production; recycling facilities; health and fitness facilities; arts studios; events centers and public recreational and cultural facilities; and private and public schools. The IG zone also allows accessory retail uses, vehicle sales and services, building materials stores, convenience stores, parking facilities, telecommunications facilities, and heliports.

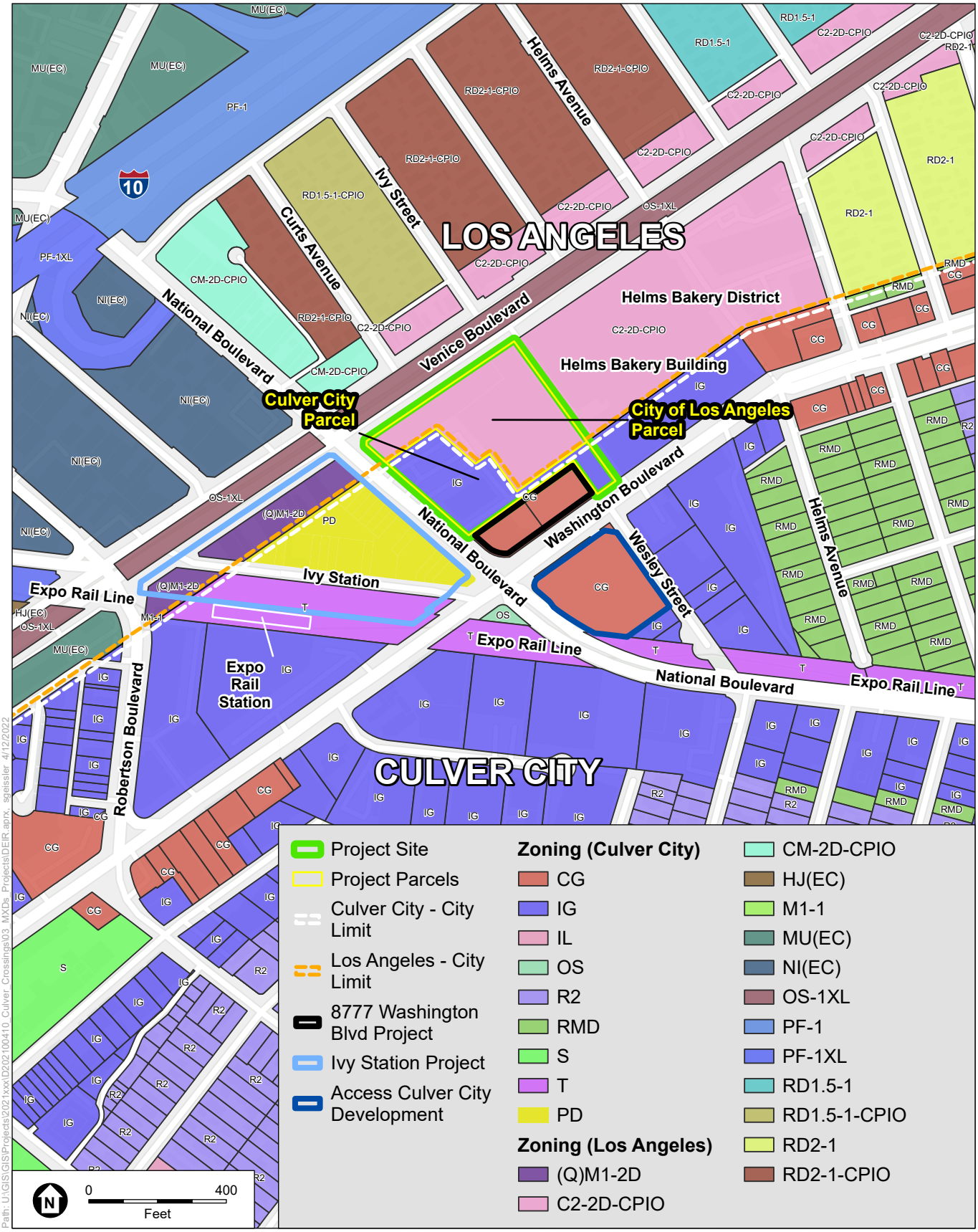
The frontage of the Culver City Parcel on Washington Boulevard, including the Helms alley, a private alley entirely on the Helms Bakery Complex, on the north side of Washington Boulevard and a portion of the Project frontage on National Boulevard, is located within the East Washington Overlay (-EW) (Section 17.260.035). The purpose of the East Washington (–EW) Overlay is to implement the East Washington Boulevard Revitalization Program. The zone sets forth building height and setback limits, as well as a range of permitted office, retail, mixed use, services, recreation, residential, industrial, and transportation and communication uses within this zoning designation. No restrictions are placed on office uses.

CCMC Sections 17.240.010 and 17.240.015 describe the purpose and requirements of the Culver City Planned Development (PD) District as allowing large scale residential and commercial complexes within a physically integrated and contiguous area and which may only be applied to sites of 1 acre or greater. Development requires the approval of a Comprehensive Plan through a rezoning of the site. No building may exceed 56 feet in height, and all utilities within the limits of a PD zone must be located underground. The allowed uses and development standards for PD districts are developed as part of the project approval process.

Culver City Bicycle & Pedestrian Action Plan

The Bicycle & Pedestrian Action Plan was adopted by the City Council in June 2020.[4] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community. In accordance with the City's Bicycle & Pedestrian Action Plan, existing bicycle lanes are located within Washington Boulevard and National Boulevard.

4 City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.



SOURCE: Nearmap, 2021; City of Culver City/Los Angeles; ESA, 2022

Crossings Campus

Figure 4.9-2
Zoning on the Project Site and in the Surrounding Area

ESA

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) is a comprehensive long-term management plan that includes designations of tree species to be planted on each street segment when an existing tree must be removed, and best management practices for tree planning, preservation, and maintenance. In addition, the UFMP includes recommendations for green connections throughout the City to encourage recreation, walking, biking, and public transit use. Recommendations are also provided for plant palettes and planting structure, places of priority, designations of trees and plants to assist with wayfinding and placemaking, and action areas and strategies to be implemented by the City in public areas.[5]

Culver City Redevelopment Plan for the Culver City Redevelopment Project

The Project Site's Culver City Parcel is located in the Culver City Redevelopment Plan Component Area No. 4, Subarea G: East Washington, of the City's Redevelopment Project. The Redevelopment Plan was adopted on November 23, 1998, was amended September 12, 2005, and will be effective through 2029. The East Washington Parcel is designated as "General Corridor." The General Corridor designation is consistent with the Culver City General Plan Land Use map but is not consistent with the Project Site's existing Industrial General (IG) zoning. The Redevelopment Plan is proposed for the purpose of eliminating blighting influences within the identified Component Area. The Agency's development objectives are to encourage development in accordance with the Culver City General Plan. The Redevelopment Plan also assists in the construction of needed public improvements and facilities. An estimated 75 acres in Component Area 4 is anticipated for open space, landscaping, building setbacks, yards, and rights-of-way at Redevelopment Project completion. In the Component Area, the establishment or enlargement of public, semi-public, institutional, or nonprofit uses is allowed. All new development shall conform to the type, size, height, and proposed use of buildings established by local statutes, ordinances, regulations, and the City General Plan. The Redevelopment Plan may not relax the requirements of the Culver City Planning and Zoning Ordinance, or any applicable specific plan. All construction in the Component Area shall comply with and meet or exceed all applicable state and local laws including, but not necessarily limited to, Fire, Building, Electrical, Mechanical, Grading, Plumbing, and the Planning and Zoning Ordinance of the City.

Culver City Design for Development Exposition Light Rail Transit and Station Area

The Design for Development (DFD) Exposition Light Rail Transit and Station Area was prepared by the Culver Redevelopment Agency in 2005. The DFD encourages a variety of land uses, including mixed-use, office, commercial, retail, and residential development within and adjacent to the Exposition Light Rail Transit (LRT) and Station Area DFD and along transportation corridors. The DFD area generally includes the public Metro right-of-way along National and Exposition Boulevards from Venice Boulevard to the City limit at Ballona Creek and specific properties located at the intersection of Washington and National Boulevards. This area is bounded on the north by Venice Boulevard and the Metro right-of-way stretching from just east of Wesley Street and extending southeasterly along the National Boulevard/Metro right-of-way to Ballona Creek. The transportation corridors are intended to provide support services for businesses, residents, and transit passengers and serve as buffers for adjacent residential uses. It is anticipated

5 City of Culver City, Culver City Urban Forest Master Plan, 2015.

that the mixed use and higher density and intensity of development along transportation corridors will reduce vehicle trips and their associated environmental impacts. Although the DFD supplements, augments, and focuses the goals, policies and objectives of various planning and redevelopment documents affecting the corridor, the standards do not include all applicable City procedures, provisions, regulations and requirements that may apply to the development of the area.[6]

General Objectives of the DFD are to:

1. Create an environment that promotes and facilitates pedestrian and alternative modes of travel (such as transit and bicycles);
2. Provide regional, local and neighborhood access to and from Culver City, without negatively impacting community character;
3. Protect and enhance community assets, including quiet residential neighborhoods; and
4. Accommodate the special needs of members of the community transit users.

The General Plan designates the DFD area as General Corridor Commercial, which is consistent with the General Plan designation for the Project Site. A small portion of the DFD area is also designated Open Space at the intersection of Washington and National Boulevards. Land uses that traditionally have low employment densities, or retail uses that are not compatible with transit and instead promote vehicle usage are prohibited. These include:

- Warehousing or distribution facilities
- Big-box retail
- Automobile sales, washing and repairs
- Nurseries
- Storage or mini-storage facilities
- Surface parking lots
- Low density housing units
- Residential units on the ground floor commercial corridor frontage of any development
- Drive-through facilities
- Strip commercial development

Culver City TOD Visioning Study and Recommendations

The Culver City Visioning Study and Recommendations (Study), dated October 20, 2017, focuses local mobility planning on the on the City's Transit Oriented District (TOD). Beginning with the Metro "E" Line Culver City Station at its core, the mobility visioning study explores linkages to connect the station area. The purpose of the Study is to develop and support multiple transportation modes and shared use of public facilities. The Study developed the following policies related to

6 City of Culver City, Exposition Light Rail Transit and Station Design for Development, June 6, 2005, p. 2.

pedestrians, transit, bicycles, traffic, Washington Boulevard, the TOD, and Transportation Demand Management (TDM).

- Pedestrians. To improve walkability, improve pedestrian safety, and encourage circulation on foot.
- Transit. To improve the efficiency and convenience of transit as a mobility option
- Bikes. To improve convenience, safety, and efficiency of a cycling infrastructure and encourage biking as an alternative mobility option.
- Traffic. To improve mobility for pedestrians, transit and bikes, as well as to relieve certain traffic congestion conditions on local streets.
- Washington Boulevard. To establish Washington Boulevard, from Downtown to its crossing at Ballona Creek, as the principal spine of the TOD area.
- TOD Policies. To guide development within the TOD area, to define and design certain improvements that address mobility, and to clarify and document the City's expectations regarding conditions for new Development.
- TDM Policies. To encourage, facilitate and promote the use of alternative mobility modes.

City of Los Angeles

Los Angeles General Plan

The City of Los Angeles General Plan (General Plan)[7], originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,[8] including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

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7 City of Los Angeles Department of City Planning, General Plan Overview, https://planning.lacity.org/plans-policies/general-plan-overview. Accessed July 13, 2022.

8 California Government Code, Title 7, Division 1, Chapter 3, Article 5. Authority for and Scope of General Plans, Section 65302 – 65303. The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

Land Use Chapter

The Framework Element Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

Urban Form and Neighborhood Design Chapter

The Framework Element Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings; and second, to enhance the physical character of neighborhoods and communities within the City.[9] The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

Open Space and Conservation Chapter

The Framework Element Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

Economic Development Chapter

The Framework Element Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment

[9] City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001, p. 5-1, et. seq.

growth areas. The Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

Transportation Chapter

The Framework Element Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework chapters of the Framework Element regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the Framework Element is implemented through the General Plan's Mobility Plan 2035, which is a comprehensive update of the General Plan Transportation Element and addressed in Section 4.12, *Transportation,* of this Draft EIR.

Infrastructure and Public Services Chapter

The Framework Element Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes. Consistency with the Framework Element is provided in Table LU-7, in Appendix J of this Draft EIR.

Los Angeles General Plan Transportation Element (Mobility Plan 2035)

The Transportation Element (Mobility Plan 2035), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles, and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (Assembly Bill [AB] 1358).

The purpose of the Mobility Plan 2035 is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan 2035 focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the

provision and use of alternative transportation modalities. The Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Consistent with the Mobility Plan, bicycle lanes are located on both sides of Venice Boulevard adjacent to the Project Site. The Transportation Element (Mobility Plan 2035) is evaluated in Section 4.12, *Transportation*, of this Draft EIR.

Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City including park sites. Consistency with the Conservation Element is evaluated in Table LU-8 in Appendix J of this Draft EIR.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels;
- A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- A City that is committed to preventing and ending homelessness.[10]

[10] City of Los Angeles, Los Angeles Housing Element 2021-2029, p. 242.

Los Angeles General Plan Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes the following goals:

- Los Angeles, A Leader in Health and Equity
- A City Built for Health
- Bountiful Parks and Open Spaces
- Food that Nourishes the Body, Soul, and Environment
- An Environment Where Life Thrives
- Lifelong Opportunities for Learning and Prosperity
- Safe and Just Neighborhoods.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City and building design procedures. As such, these policies address characteristics of the physical environment that contribute to public health.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The West Adams–Baldwin Hills–Leimert Community Plan, adopted by Los Angeles City Council in June 2016 and effective in April 2017, sets forth actions to achieve a common vision that encompasses the full spectrum of issues and opportunities regarding the Community Plan Area's physical evolution. The Community Plan addresses a wide range of topics including jobs and housing, parks and open space, urban design and mobility, as well as arts, culture, history and health, and serves several important purposes including:

- To outline a vision for long-term physical and economic development as well as community enhancement within the Community Plan Area;
- To provide strategies and specific actions that will allow this vision to be realized;
- To establish a basis for judging whether specific development proposals and public projects are in harmony with Community Plan policies and standards;
- To direct City departments, other public agencies, and private developers to design and develop projects that enhance the character of the community; taking advantage of opportunities related to site, setting and amenities;
- To provide the basis for establishing priorities for detailed plans and implementing programs, such as zoning ordinances, design overlays, development standards, Capital Improvements Program projects, and facilities plans, as well as redevelopment and other area plans.

The Community Plan is intended to shape positive community change by harmonizing the Community Plan Area's unique character through encouraging sustainable land use patterns as introduced through citywide policies and regional initiatives.

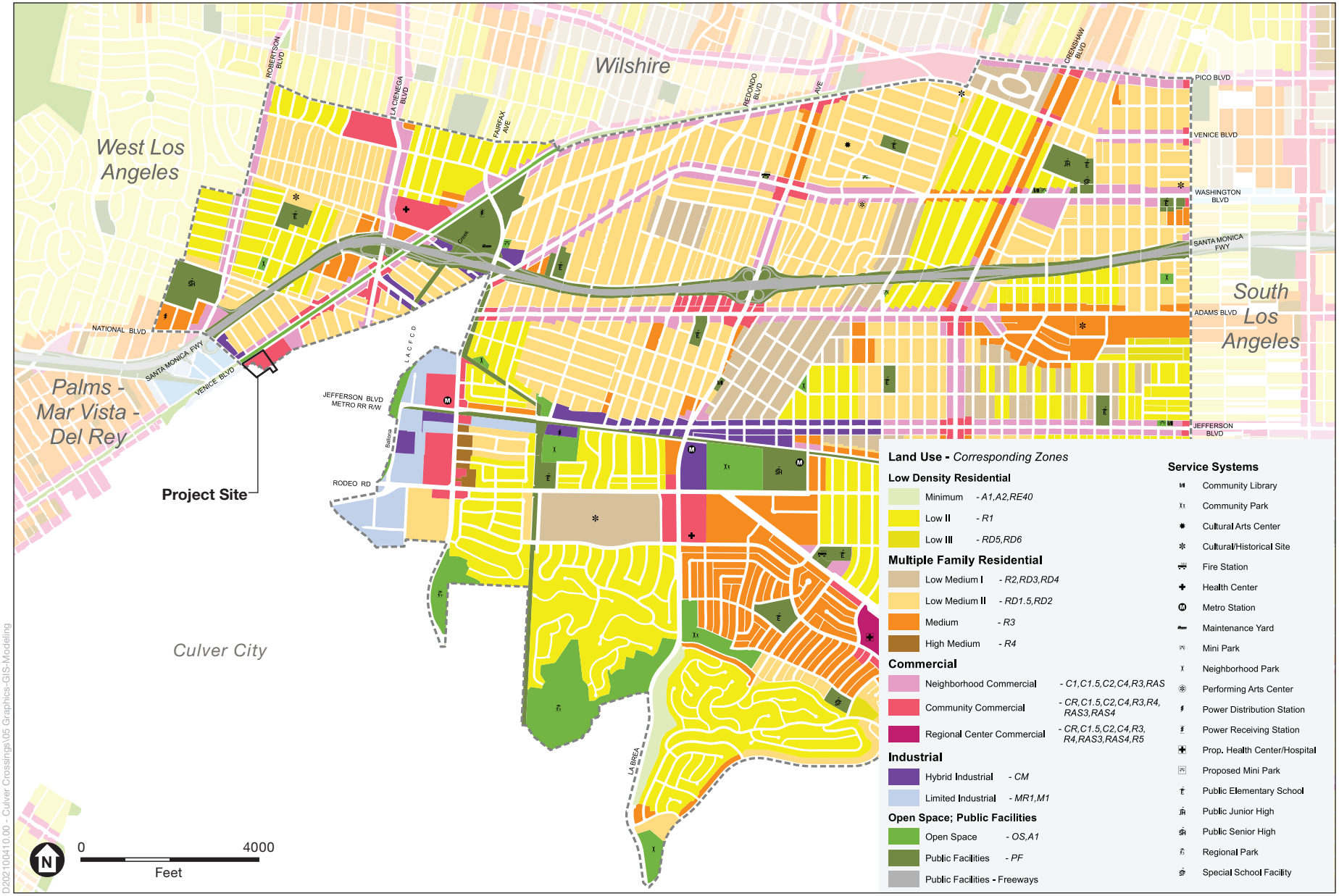
The Land Use and Urban Design chapter of the Community Plan expresses the community's vision for the future. In particular, this chapter describes the community's land uses and specifies goals and policies that address residential, commercial, and industrial development. It further outlines implementation strategies and programs relative to commercial revitalization, health, and sustainability as well as historic preservation and the conservation of neighborhood character. The Project Site is located within a Commercial Area. The Project Site is designated as Community Commercial in the Community Plan, as illustrated in **Figure 4.9-3**, *West Adams–Baldwin Hills–Leimert Community Plan General Plan Land Use Map*, below. Corresponding zones for the Community Commercial designation are CR, C1.5, C2, C4, R3, R4, RAS3, and RAS4.

As shown in Figure 1-3 and Figure 3-7 in the West Adams–Baldwin Hills–Leimert Community Plan, the Project Site is also located within a designated Community Center (Transit-Oriented Development Area, Commercial Node). The City's commercial hierarchy is derived from the Framework Element but defined in the Community Plan include the following four general categories: Regional Center, Commercial Center, Neighborhood District, and Mixed-Use Boulevard.[11] Community Centers intensify business and social activity compared to Neighborhood Centers. They contain uses that serve the larger community and are generally medium-scaled, although this varies depending on the character of the surrounding area. Community Centers, as with the Project area, are often served by small shuttles, local and rapid buses, or subway stops.

The Project Site is designated under the Community Plan and the CPIO as within the Venice/National Transit Oriented District (TOD) Subarea. As described in the Community Plan, the purpose of TODs is to promote more livable communities by minimizing traffic and pollution impacts from traveling for purposes of work, shopping, school, and recreation. TOD is defined in the Community Plan as moderate- to high-density development located within an easy walk of a major transit stop, generally with a mix of residential, employment, and shopping opportunities. TOD encourages walking and transit use without excluding the automobile. TOD can be new construction or redevelopment of one or more buildings whose design and orientation facilitate transit use. As discussed in the Community Plan, "a well-designed, vibrant TOD community can provide many benefits for local residents and businesses, as well as for the surrounding region. Compact development near transit stops can increase transit ridership and decrease rates of VMT, thereby yielding a good return on transit system investments. TOD can also provide mobility choices, increase public safety, increase disposable household income by reducing transportation costs, reduce air pollution and energy consumption rates, help conserve resources and open space, assist in economic development, and contribute to the housing supply."[12] The Project's potential to conflict with applicable land use policies of the Community Plan is evaluated in the *Analysis of Project Impacts* subsection, below.

[11] City of Los Angeles, Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, p. 1-12

[12] City of Los Angeles, Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, p. 3-68.



SOURCE: City of Los Angeles, 2017

Crossings Campus

Figure 4.9-3
West Adams-Baldwin Hills- Leimert Community Plan General Plan Land Use

ESA

The Mobility Chapter of the Community Plan defines goals and policies for the community's circulation system, focusing on enhancing mobility and access to all system users. This chapter discusses the area's modes of transportation, including walking, bicycling, public transit, and driving. The Project is evaluated in relation to Community Plan transportation policies, as well as the General Plan Transportation Element in Section 4.12, *Transportation*, of this Draft EIR.

The Community Plan's Community Services and Facilities Chapter describes key public services and infrastructure, including police, fire and emergency services, libraries, parks, open space, the urban forest, schools, water, wastewater, solid waste, power and street lighting. The service provider, existing facilities and service levels and future needs. The effects of the Project on public services are evaluated Section 4.11, *Public Services*, and Section 4.14, *Utilities and Service Systems*, of this Draft EIR. The Community Plan is evaluated in Table LU-9 in Appendix J of this Draft EIR.

Los Angeles Municipal Code

All development activity on the Los Angeles Parcel is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. 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). The Community Plan 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 "D" development limitation that restricts floor area to a maximum of six times the buildable area of the lot. The "CPIO" designation applies to the West Adams–Baldwin Hills–Leimert Community Plan Overlay, which establishes building setbacks, maximum building heights, and other development standards. The "D" limitation provides that new uses and development projects shall comply with the West Adams CPIO District, including the Venice/National TOD Subarea regulations. The Project Site is located within the Venice / National - Expo Line Transit-Oriented (TOD) Subarea of the CPIO. Zoning for the City of Los Angeles Parcel is shown in Figure 4.9-2, Existing Zoning of the Project Site and Surrounding Area, above.

Los Angeles Exposition Corridor Transit Neighborhood Plan

The Exposition Corridor Transit Neighborhood Plan (Specific Plan), adopted December 26, 2019, is a policy and regulatory document for areas located near the Expo Light Rail Line and as shown in Map A of the Specific Plan.

The purposes of the Specific Plan pertinent to the Project Site include to direct growth and accommodate new residential, mixed-use, commercial, and industrial development near transit stations; expand and strengthen the economic base of the City and generate tax revenue to fund key City services; implement the West Adams–Baldwin Hills–Leimert, Palms–Mar Vista–Del Rey, and West Los Angeles Community Plans; reduce greenhouse gas emissions by facilitating alternative modes of transportation and decreasing automobile dependence; promote transit ridership on the Exposition Light Rail Line and other transit systems; encourage walking and bicycling as a means to safely and conveniently circulate within and between neighborhoods and to access transit; ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with

surrounding neighborhoods through building design and site planning; provide a network of active street frontages, publicly accessible open spaces, and other community facilities for socializing, placemaking, and community building.

Los Angeles Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the Los Angeles Municipal Code (LAMC). The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays. The Citywide Design Guidelines are related to aesthetic effects and are typically evaluated in the Aesthetics section of the Draft EIR. Because the Project's urban setting and Transit Priority Area (TPA) status would exempt it from the aesthetics analysis, the aesthetics discussion in this Draft EIR is for informational purposes only. As such, the Citywide Design Guidelines are not evaluated therein.

Existing Conditions

The Project Site is composed of two properties: one 1.63-acre (71,016 sf) parcel located in the City of Culver City (Culver City Parcel); and one 2.83-acre (123,318 sf) parcel located in the City of Los Angeles (Los Angeles Parcel). The total area of the Project Site is 4.46 acres.

The Culver City Parcel is occupied by two, single-story repurposed warehouse buildings: (1) a 9,739-sf building currently used for storage fronting National Boulevard; and (2) a 9,082-sf building fronting Washington Boulevard (8771 Washington Boulevard) that is currently vacant but was formerly used for offices. The two existing buildings total 18,821 sf of floor area. The Project Site is currently accessed via two 2--way driveways, with both left and right exit turns at National Boulevard.

The Los Angeles Parcel is currently improved with an 86,226-squre-foot warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office floor area and 34,726 sf of retail floor area. In addition to the office and retail floor area, there are 70 spaces of enclosed vehicle parking. The warehouse/retail/office building fronts Venice Boulevard and is accessed via the driveway in the Culver City Parcel. Metered on-street parking is also provided along the Venice Boulevard frontage. The Venice Boulevard frontage includes an approximately 25-foot sidewalk.

The Project Site is located within 600 feet of Metro's E Line Culver City Station. Other transit operations in the vicinity of the Project 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 Expo Light Rail Line and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day.

Project Vicinity

The City of Los Angeles/Culver City boundary is located to the south of Venice Boulevard and extends through the Project Site. Figure 4.9-1 (Project Site and Surrounding Land Use Designations) above, illustrates the designated land uses within both the City of Los Angeles General Plan and the Culver City General Plan. The area is generally built out, and the land use designations in the City of Los Angeles General Plan and the Culver City General Plan generally reflect the actual built environment. However, commercial uses are located within the Hybrid Industrial (HI) designation at the north side of Venice Boulevard. As further shown in Figure 4.9-1, the Project vicinity is highly urbanized in both jurisdictions. The street system in the Project area follows a diagonal and/or curving grid, in which major boulevards run parallel, then meet or cross. In the following discussion of the surrounding land uses, for the purpose of simplicity, it is assumed that Venice Boulevard and Washington Boulevard near the Project Site travel east-west and National Boulevard travels north-south.

Land Uses North of the Project Site

Land uses to the north of the Project Site at the north side of Venice Boulevard are primarily commercial along the street frontage. As shown in Figures 4.9-2 and 4.9-3, the frontage along Venice Boulevard is designated as Neighborhood Commercial and generally zoned as C2-2D-CPIO to the east of National Boulevard. The frontage along Venice Boulevard to the west of National Boulevard is located within the City of Los Angeles and designated as Limited Industrial and zoned as NI(EC). Uses include an older two-story office building providing professional services at the northeast corner of Venice Boulevard and National Boulevard and a Goodwill store and other retail uses at the northwest corner of Venice Boulevard and National Boulevard. These businesses are served by surface parking lots. Industrial uses are located along the north side of Venice Boulevard beyond the Goodwill Store to the west of National Boulevard. Retail and a variety of commercial uses are located along the north side of Venice Boulevard to the east of National Boulevard. Some of these uses, between Curtis Avenue and Ivy Street are residential buildings within a commercial zone and used partly for commercial purposes. Residential neighborhoods within a residential zone (designated as Low Medium II and zoned as RD2-1-CPIO) are located to the north of the commercial corridor along the north side of Venice Boulevard. Other commercial uses along the north side of Venice Boulevard include a two-story office building and large surface parking lots fronting Venice Boulevard between Ivy Street and Hutchinson Avenue.

National Boulevard extends to the north of Venice Boulevard and crosses under the Santa Monica Freeway (I-10) one block to the north of the Project Site. As shown in Figures 4.9-2 and 4.9-3, the area along the east side National Boulevard to the north of the Venice Boulevard is designated as Hybrid Industrial and zoned as CM-2D-CPIO. The west side of National Boulevard to the north of Venice Boulevard) is designated as Light Industrial and zoned as NI(EC). Both sides of National Boulevard are developed with light industrial uses, several of which are automobile service establishments. The light industrial uses to the east of National Boulevard abut the residential neighborhoods discussed above. However, the area beginning at National Boulevard and extending

several blocks to the west between Venice Boulevard and I-10, is wholly industrial and fully developed. All of the land uses to the north of the Project Site are located within the jurisdiction of the City of Los Angeles.

Land Uses West of the Project Site

Land uses west of National Boulevard to the south of Venice Boulevard include the Ivy Station mixed use development. Ivy Station, bounded by National Boulevard, Venice Boulevard, and the elevated Expo Light Rail Line, is a transit-oriented development on an approximately 5.2 acre-site located primarily within Culver City. As shown in Figures 4.9-1 and 4.9-2, the Ivy Station site is designated as Community Commercial and zoned as Planned Development (PD). The north edge of Ivy Station, which is located in the City of Los Angeles is designated as Limited Industrial (see Figure 4.9-3) and zoned (Q)M1-2D. Five- to seven-story buildings within Ivy Station include residential, office, retail, restaurant, and hotel uses. The development also includes a large central open space and provides immediate access to the adjacent Metro "E" Line Culver City Station. The Ivy Station development is located within a Culver City PD zone, with a larger office building along the south edge of Venice Boulevard located within a Los Angeles industrial zone. To the west of the Project Site, Washington Boulevard passes under the elevated Expo Light Rail line, crossing into a regional commercial district, designated as General Corridor Commercial and zoned General Industrial (IG). This area is characterized by mixed use, studios, offices and the higher density development of Culver City's Downtown District. A small section at the southwest corner of Washington and National Boulevards is designated as Open Space and zoned OS.

Land Uses East of the Project Site

As shown in Figures 4.9-1 and 4.9-2, land uses along the south side of Venice Boulevard, in the City of Los Angeles to the east of National Boulevard, are designated as Community Commercial and zoned C2-2D-CPIO and include the north sector of the Project Site and the Helms Bakery Building and the Helms Bakery Complex. The Helms Bakery Building is located to the immediate east of the Project Site and separated from the Project Site by the existing Helms alley. The Helms Bakery Complex, which was built around the architecturally distinctive Helms Bakery Building and the now closed bakery, provides a broad range of retail and restaurant uses, and is known for its high number of modern furniture businesses. The Helms Bakery Complex begins at the Helms Bakery Building and extends west of Helms Avenue to Hutchinson Avenue, two blocks to the west.

Land Uses to the South of the Project Site

The southwest corner of National Boulevard at Washington Boulevard is developed with newer construction, including the 8777 Washington building, a four-story office building at the north side of Washington Boulevard. As shown in Figures 4.9-1 and 4.9-2, these sites are designated as General Corridor Commercial and zoned CG. This development provides pedestrian-facing electronic art along Washington Boulevard and offices on the upper floors. The five-story Access Culver City development is located at the south side of Washington Boulevard between National Boulevard and Wesley Street, directly to the south of the 8777 Washington building. This mixed-use development includes multi-family housing along National Boulevard and a co-op grocery store, bank, fitness and spa uses, and pedestrian-oriented retail uses along Washington Boulevard and the adjacent Wesley Street.

To the south of the Project Site at the south of Washington Boulevard and to the east of Wesley Street are older creative office/commercial buildings located within the General Corridor Commercial designation and zoned IG. These uses are adjacent to multi-family neighborhoods located farther to the south, which are located within the Medium Density Multi Family and Low Density Two-Family designation and RMD zone.

To the south of Washington Boulevard, National Boulevard crosses under the elevated Expo Light Rail Line and converts into a divided highway lined with office buildings, light manufacturing buildings, and the Turning Point School along its southwest edge. The north side of National Boulevard is characterized by the same General Corridor Commercial and multi-family designations that extend to the south of the Project Site, discussed above. The south side is designated as Industrial and zoned IG.

4.9.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to land use and planning if it would:

- **LU-1:** Physically divide an established community; or
- **LU-2:** 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.

For this analysis, the Appendix G thresholds listed above are relied upon.

Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, which are applicable to the Project Site and the Project and that have been adopted for the specific purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would 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.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide,

Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project an applicable plan is a legal determination not a physical impact on the environment. ...if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under the Planning and Zoning law (Government Code Section 65000 et seq.) strict conformity with all aspects of a plan is not required. Plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

The Land Use section evaluates Project consistency with applicable plans, policies and regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. These include SCAG's 2020–2045 RTP/SCS, the Culver City General Plan, the Culver City Bicycle & Pedestrian Action Plan, the Culver City Urban Forest Master Plan, the Culver City Redevelopment Plan for the Culver City Redevelopment Project, the DFD Exposition Light Rail Transit and Station Area, the Culver City TOD Visioning Study and Recommendations, the Culver City Municipal Code, the City of Los Angeles General Plan Framework, Conservation, and General Health and Wellness Elements, the West Adams–Baldwin Hills–Leimert Community Plan, the West Adams–Baldwin Hills–Leimert Community Plan Overlay, and the Los Angeles Municipal Code. .With the exception of the Culver City Urban Forest Master Plan, the Culver City Municipal Code, the Los Angeles General Plan Health and Wellness Element, and the City of Los Angeles Municipal Code, the applicable plans, policies and regulations are evaluated in detail in Tables LU-1 through LU-11, provided in Appendix J of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is based on the tables and summarized in the impact analysis below. To the extent that the Projects' potential conflict with a plan, program or policy is analyzed in another section of the EIR that plan is not further discussed in the Land Use Section. For example, consistency with transportation plans is analyzed in Section 4.12, *Transportation,* of this Draft EIR.

Project Design Features

There are no project design features that relate to land use.

Analysis of Project Impacts

Threshold LU-1: Would the Project physically divide an established community?

As discussed in the Initial Study (Appendix A of this Draft EIR), the Project would not physically divide an established community and, therefore, a less-than-significant impact would occur with respect to Threshold LU-1. No further analysis is required.

Threshold LU-2: Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

As evaluated in detail in Table LU-1, *Consistency of the Project with Applicable Strategies of the 2020–4045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigation and Environmental Effect*, the Project would not conflict with applicable strategies of the Regional Transportation Plan/Sustainable Communities Strategy. The Table LU-1 evaluation is provided in Appendix J of this Draft EIR. In summary, the Project would not conflict with policies to focus growth near destinations and mobility options. The Project would represent an intensification of development within proximity of the Metro "E" Line Culver City Station, multiple bus lines, and existing bike paths in National and Venice Boulevard. As such, the Project would not conflict with policies that emphasize land use patterns that facilitate multimodal access to work, educational uses and other destinations. The Project would not conflict with policies that plan for growth near transit investments and support implementation of first/last mile strategies. The location of the Project within an existing urban area near a transit station would not conflict with policies that prioritize infill redevelopment, or with policies to accommodate new growth or increase amenities and connectivity in existing neighborhoods. In addition, the Project would implement a voluntary TDM Program (refer to Project Design Feature TRAF-PDF-2) that would not conflict with strategies that reduce the reliance on and number of solo car trips.

The Project would meet the USGBC LEED Gold equivalent (refer to Project Design Feature GHG-PDF-1), inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and California Green Building Standards (CALGreen) Building Code and would thus not conflict with strategies to support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards. The Project would incorporate canopy street trees and provide sustainability features such as water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures; electric vehicle (EV) charging, EV capable, and EV ready parking spaces; bicycle facilities; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; active indoor/outdoor air circulation; and adequate daylight, all of which would support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration and promote more resource efficient development focused on conservation, recycling and reclamation. In addition, the Project would incorporate a 7,120-square-foot landscaped, publicly accessible, privately maintained amenity area which would be directly accessible from Washington Boulevard. Thus, the Project would not conflict with policies to identify ways to improve access to public park space. The Project would not conflict with policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy would be less than significant.

Culver City General Plan

As evaluated in detail in Table LU-2, *Consistency of the Project with Applicable Goals, Objectives, and Policies of the Culver City General Plan Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of this plan. The Table LU-2 evaluation is provided in Appendix J of this Draft EIR. The General Plan Land Use Element designates the Culver City component of the Project Site as "Community Serving Center," or Community Commercial and as located with the "Eastern Subarea." The Project would result in the redevelopment of parcels at a key location within Culver City and the development of a 167,000 sf office building. Demolition of the existing warehouse/retail/office use would result in a net increase of 148,179 sf of office floor area. The Project would be designed to accommodate approximately 2,400 employees which would support many of the City and region's commercial retail uses and services.

In addition, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area with landscaping, seating, and a flexible combination of temporary uses potentially including a coffee kiosk, bicycle co-op or other programed activities. Accessed from Washington Boulevard, the amenity area would serve residents from nearby residential neighborhoods. The Project would also incorporate sidewalk and landscape improvements on National and Venice Boulevards that would promote pedestrian access between residential neighborhoods and the Metro "E" Line Culver City Station within the Ivy Station development to the west of National Boulevard. As such, the Project would not conflict with General Plan Land Use policies to encourage new business opportunities that expand Culver City's economic base and serve the needs of the City's residential and business community. The Project would provide all parking in two adjacent on-site subterranean structures and would provide parking access via one right-turn only driveway on National Boulevard, one right turn only driveway on Venice Boulevard (providing access via an alleyway to the Project Site), and a secondary right turn only driveway off Washington Boulevard. The configuration of the driveways would reduce potential pedestrian/vehicle conflict. Therefore, the Project would not conflict with General Plan Land Use policies to address parking as well as traffic ingress and egress.

The Project would provide for the widening and landscaping of existing sidewalks on National and Venice Boulevards,. The Venice Boulevard sidewalk (with parkway) varies up to 25 feet and would be completed to 28 feet under the Project. The National Boulevard sidewalk and parkway is seven feet and would be completed to 15 feet under the Project. The Venice Boulevard sidewalk would include double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. The National Boulevard sidewalk improvements would more than double the existing 7-foot sidewalk and parkway by providing an 8-foot sidewalk and a 7-foot parkway. The improvements would be continuous along National Boulevard both in the City of Los Angeles and Culver City. . In addition, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,326 sf of which would be landscaped. This open space area would be located off Washington Boulevard and would enhance the visual character of Washington Boulevard between the Helms Bakery Complex and National Boulevard. The Project would also include 51,600 sf internal courtyard (available to Project employees), of which 39,000 sf would be landscaped. Therefore, the Project would not conflict with policies to extend the City's parklike qualities through streetscape and urban design improvements to create a sustainable urban forest, to enhance Culver

City's impact and quality of life, to protect and expand Culver City's open space resources, and to provide passive recreational open space within walking distance of all City neighborhoods.

The proposed office buildings would feature primarily glass facades, defined by deep horizontal overhangs at each of the stories Buildings 1 and 2 would feature full height glazing defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. Deep setbacks at the building entrances would articulate street walls. Exterior walls featuring sections of screen (horizontal slats) would create a framing affect for the building entrances. (Architectural details are further discussed in Table LU-2 and in Section 4.1, *Aesthetics*, of this Draft EIR.) With the careful design and site layout, as proposed, the Project would not conflict with General Plan policies that support the highest quality of architectural and site design in new construction and streetscapes.

The Project would not physically impact or materially impair the Helms Bakery Complex or affect the Helms Bakery Complex's integrity of setting, feeling, or association. The design and materials of the new construction would be distinctive from, yet compatible with, the Helms Bakery Complex such that the existing Helms Bakery Complex would remain visible within the built environment in the same way as under existing conditions. The existing building adjacent to the Helms Bakery Building is setback less than three feet from the Venice property line and located approximately 24 feet from the Helms Bakery Building. Building 2 will be set back at least nine feet, six inches from the Venice property line at the ground floor and 55 feet from the Helms Bakery Building on all levels. With the demolition of the existing building and the Project's increased setback and separation, the Helms Bakery Building would be more visible from eastbound Venice Boulevard than under existing conditions. In addition, with the demolition of the on-site building on Washington Boulevard and the conversion of this location to permanent open space, the Helms Bakery Building's Washington Boulevard frontage would also become more visible from eastbound Washington Boulevard. As such, the new construction would not detract from the Helm's Bakery Building's visibility or prominence within the built environment. Therefore, the Project would not conflict with policies that promote the City's architectural and cultural heritage by preserving buildings and sites that reflect Culver City's varied history and development. The highly aesthetic, landmark make-up of the Project would contribute to the "gateway" character of the intersection of Venice and National Boulevards and, as such, the Project would not conflict with General Plan policies to improve the Eastern Sub-Area's identity as part of Culver City gateway.

As discussed in Section 4.10, *Noise*, of the Draft EIR, the Project would not increase ambient noise levels that would exceed the City's noise standards at any sensitive receptor sites from construction stationary or mobile noise sources and, thus, would not conflict with policies to ensure compatibility of land uses with regard to noise sources and receptors. The Project would not conflict with Culver City General Plan policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the General Plan would be less than significant.

Culver City Bicycle and Pedestrian Action Plan

As evaluated in detail in Table LU-3, *Consistency of the Project with Applicable Goals, Objectives, and Policies of the Culver City Bicycle and Pedestrian Action Plan General Plan Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of this plan. The Table LU-3 evaluation is provided in Appendix J of this Draft EIR. In summary, the Project would be located adjacent to existing bike paths in Washington and National Boulevards. These routes would provide access to the Project's office uses, and for future occupants to the region's retail uses, services, and residential neighborhoods. The Project would include 175 bicycle parking spaces and showers for employee use. The Project would also widen and landscape existing sidewalks on National and Venice Boulevards, which would improve pedestrian access between the Project Site and the Metro "E" Line Culver City Station and between the Helms Bakery Complex and Ivy Station, as well as general pedestrian circulation in the area. Because the Project would accommodate cyclists and would improve pedestrian routes in the area, it would not conflict with policies to facilitate access to education, retail, parks and libraries, schools, recreation centers, transit, and other neighborhood destinations. The Project would intensify development and daytime occupancy of the Project Site by up to 2,400 employees in proximity to the Metro "E" Line Culver City Station and adjacent to a range of bus stops along Venice, National, and Washington Boulevards. With the development of sidewalk improvements, including widening and landscaping, and the provision of publicly accessible, landscaped open space on Washington Boulevard to enhance pedestrian comfort, and the Project's high density use in proximity to transit near or adjacent to the Project Site, the Project would not conflict with policies to support public transit service.

The Project would provide one driveway on National Boulevard and one on Venice Boulevard adjacent to the existing Helms alley on the Helms Bakery Complex. A secondary driveway would provide access via an alleyway on Washington Boulevard. These driveways would be right-turn only, which would reduce conflicts between motor vehicles and bicycles and pedestrians. With all parking located within subterranean structures, all existing surface parking would be removed, and the potential for conflicts between cyclists, pedestrians, and motor vehicles in open parking lots would also be reduced. The Project's wider sidewalks would also reduce pedestrian and bicycle conflicts. Therefore, the Project would not conflict with policies to reduce collisions involving bicyclists and pedestrians. The Project would provide bicycle parking and showers that would support active bicycle use by on-site employees. The Project's wider, landscaped sidewalks and its proximity to a range of transit options, as well as convenient walking distance to the Helms Bakery Complex, the Access Culver City mixed-use, the Ivy Station mixed use, and other retail uses and services and residential neighborhoods in the area would encourage pedestrian activity. Therefore, the Project would not conflict with policies that use infrastructure and programs to promote an active lifestyle that includes bicycling and walking.

The Project's proximity to the Metro "E" Line Culver City Station and a range of exiting bus routes, as well as a variety of transit options, a shuttle program, cycling, and walking, would reduce the need for automobile use and would reduce per capita vehicle miles. With the potential for the reduction in automobile use, the Project would not conflict with policies to reduce air pollution, asthma rates, and greenhouse gas emissions or with policies to reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.

Culver City Urban Forest Master Plan

Chapter 2 of the UFMP provides recommendations for the urban forest, beginning with the large scale and broad vision for the urban environment of the City. It envisions an urban forest to strengthen the important network of "green connections" throughout the City. More than just treelined streets, the UFMP describes a green infrastructure that includes the urban forest, park land, sustainable transportation networks, and pedestrian areas that would provide vital functions for the City including improving air and water quality, mitigating the urban heat island effect, reducing energy demand, and improving public health. Both sides of National Boulevard and Washington Boulevard adjacent to the Project Site are designated in the UFMP as "pedestrian corridor," and Washington Boulevard is identified as a key location for strengthening the urban forest. [13] One of the most important components of the UFMP is the Tree Palette, which provides a plan for creating a more resilient urban forest in Culver City. The Tree Palette is a master list of the species that are recommended for Culver City's urban forest based on proven local performance, ability to thrive in urban conditions, resiliency, environmental benefits, aesthetics, habitat/ecosystem value, and good "new" species for Culver City.

The Project design would provide 7,120 sf of publicly accessible, privately maintained amenity area along its Washington Boulevard frontage and would incorporate a total of 28 street trees along the Building 2 frontage on Venice and National Boulevards (City of Los Angeles) and six street trees along the Building 1 frontage on National Boulevard (Culver City). The selected species *ulmus parvifolia*, or Chinese elm, is listed on the UFMP Tree Palette as meeting the performance criteria provided above. The Washington Boulevard publicly accessible, privately maintained amenity area, which would be directly accessible from Washington Boulevard, would include landscaping, seating, and other amenities. The location of this open space area between the Helms Bakery Complex and the Metro "E" Line Culver City Station and the Ivy Station development would enhance the pedestrian corridor along this street and contribute to the improvement of Washington Boulevard envisioned in the UFMP. In addition, the new street trees, including a double row (colonnade) of Chinese elm trees along Venice Boulevard, and widening along the National and Venice Boulevard frontages, as well as the location of these routes between the Helms Bakery Complex and the Metro "E" Line Culver City Station (and Ivy Station development) would enhance the pedestrian character of these streets. Because the Project would increase street trees in accordance with the UFMP palette and provide for landscaped, publicly accessible, privately maintained amenity area on Washington Boulevard, it would not conflict with polices related to improvements within the designated pedestrian corridor and the landscaped open space on Washington Boulevard. Therefore, the Project would not conflict with UFMP policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to this plan would be less than significant.

Culver City Redevelopment Plan for the Culver City Redevelopment Project

As evaluated in detail in Table LU-4, *Consistency of the Project with Applicable Goals, Objectives, and Policies of the Culver City Redevelopment Plan for the Culver City Redevelopment Project Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of this plan. The Table LU-4 evaluation is provided in Appendix J of this Draft

[13] City of Culver City, Culver City Urban Forest Master Plan, 2015, p. 61.

EIR. In summary, the Project Site is located within Component Area 4 of the Redevelopment Plan. As discussed in Table LU-4, the Project would be consistent with the Community Commercial land use designation of the General Plan and the existing -EW and IG zones, which allow for office uses, including creative offices and multimedia production and, as such, would not conflict with policies that require the Project to be consistent with the City's General Plan. As required under the Redevelopment Plan, the Project would not conflict with policies of the Redevelopment Plan that require compliance with applicable state and local laws and the Culver City General Plan. As discussed, above, in the discussion of applicable policies of the Culver City General Plan and in Table LU-4 in Appendix J, the Project would not conflict with the General Plan's Land Use, Open Space, and Noise Elements.

As discussed in Section 4.12, *Transportation*, of this Draft EIR, the Project would also not conflict with the applicable policies of the General Plan Circulation Element as required by the Redevelopment Plan. The Project would provide for widening and landscaping of existing sidewalks on National and Venice Boulevards, including the provision of double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and adjacent planting and turf varying from 9 feet to 14 feet in width and second inside sidewalk of varying from 6 feet to 11 feet, for a total sidewalk/parkway dimension of 25 feet. Under the Project, the sidewalk/parkway would be improved to an 8-foot landscaped parkway, 13 feet of sidewalks, and 7-foot landscaped planter for a total sidewalk/parkway width of 28 feet. National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to 8-foot sidewalk and 7-foot landscaped parkway. Therefore, the Project would not conflict with Redevelopment Plan policies related to the improvements and dedications of public streets and rights-of-way. The Project would also not conflict with requirements of the Redevelopment Plan that all outdoor materials and equipment such as elevator bulkheads and equipment would be screened and trash collection areas would be interior to the Project and would not be visible. The Project would also be consistent with the General Plan's maximum height requirement of 56 feet for the Culver City parcel, as well as land coverage, traffic access, setbacks, and other standards of the General Plan and, as such, would not conflict with Redevelopment Plan policies that establish limits, restrictions, and controls on development of the Project Site as required by the General Plan. Therefore, the Project would not conflict with Culver City Redevelopment Plan policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the Redevelopment Plan would be less than significant.

Design for Development Exposition Light Rail Transit and Station Area

As evaluated in detail in Table LU-5, *Consistency of the Project with Applicable Policies of the Design for Development Exposition Light Rail Transit and Station Area Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of this plan. The Table LU-5 evaluation is provided in Appendix J of this Draft EIR. Policies B through N (excepting Policy G) and fire safety of the DFD Plan would be applicable to the Project Site. In summary, the Project would redevelop parcels within 600 feet of the Metro "E" Line Culver City Station. With the removal of existing warehouse/retail/office uses, the Project would result in a net increase of 430,953 sf of office floor area. Within the Culver City parcel, the new use would result in an office building with 167,000 sf of floor area and a net increase of 148,179 sf of office floor area. The Project would accommodate approximately 2,400 employees. Therefore, the Project would not conflict with the

Policy B to increase intensity of development with higher intensity land uses near transit stations and to create a critical mass to further stimulate development. Building 1, located on the Culver City Parcel, would be four stories and 56 feet in height in accordance with the Culver City General Plan and the Culver City Redevelopment Plan for Component Area 4, as well as existing height constraints set forth in CCMC Section 17.240 for PD Districts. Therefore, the Project would not conflict with Policy C requiring structures in the Plan area to be built to appropriate heights.

With widened sidewalks along National Boulevard and the provision of 7,120 sf of publicly accessible, privately maintained amenity area along Washington Boulevard, the Project would not conflict with Policies D and E for building and development setbacks relative to zoning requirements and public open space for informal pedestrian gathering places adjacent to surrounding buildings. The Project's building entrances would be oriented to the sidewalks and at sidewalk level, within deep landscaped setbacks that would enhance the experience of pedestrians on Venice and National Boulevards. The Project would feature full height glazing that would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance.. Signage would consist only of building identification signs (company name and street address) and wayfinding signage for pedestrians. The Project would be designed to USGBC LEED Gold equivalent standards (refer to Project Design Feature GHG-PDF-1), inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen Building Code. Therefore, the Project would not conflict with Policy H related to architectural design, including pedestrian-oriented building exteriors, signage, and green building standards.

The Project's pedestrian lighting along National and Venice Boulevards would accommodate the movement of cyclists in the adjacent National and Venice Boulevard bike paths as well as pedestrians entering and exiting the Project Site and pedestrians walking between the area's centers, including the Helms Bakery Complex to the east and the Ivy Station development (including the Metro "E" Line Culver City Station) to the west of the Project Site. The Project Site is not located adjacent to residential neighborhoods and, further, all exterior lighting would be directed onto the sidewalks and not toward any off-site residential uses per CCMC Section 17.300.040.A.2, which requires that all exterior lighting be energy efficient and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site and directed downward and away from adjoining properties and public rights-of-way. Therefore, the Project would not conflict with Policy I to provide efficient and non-intrusive right-of-way lighting. The Project's construction and operational noise levels, including composite noise, would not exceed ambient noise levels exceeding established standards at any sensitive receptor site. Please refer to Section 4.10, *Noise*, of this Draft EIR for more detailed discussion of the Project's noise impacts. As such, no additional sound attenuation, such as sound walls, berms, or sound absorbing materials would be required. Therefore, the Project would not conflict with Policy J related to sound attenuation. The Project would pay in lieu fees to the City in accordance with the City's Art in Public Places Ordinance. Therefore, the Project would not conflict with Policy K related to public art and new development.

All onsite vehicle parking, which would meet the total Project demand for employees and visitors, would be located within subterranean structures. Off-site or surface parking would not be required. The Project would minimize impacts on pedestrians and encourage pedestrian activity by

maintaining right-turn-only and eliminate all surface parking to reduce pedestrian/vehicle conflicts. Therefore, the Project would not conflict with Policy L, which encourages pedestrian activity and on-site, below grade parking. The Project Site is not located adjacent to any residential uses and would not adversely impact residential used during operation. During construction, the Project would implement a Construction Traffic Management Plan, including a plan for construction employee parking, which would reduce the impact of construction activities on surrounding residential land uses. Therefore, the Project would not conflict with Policy M to protect adjacent residential neighborhoods. As evaluated in Section 4.10, *Noise*, of this Draft EIR the greatest risk of vibration would occur during excavation activities for the subterranean garage. The adjacent Helms Bakery Building, within the historical Helms Bakery Complex, is the most sensitive receptor in proximity to the Project Site that could be impacted by higher vibration levels. As discussed in Section 4.10, *Noise*, of this Draft EIR, the implementation of mitigation measures would reduce vibration impacts to a level of less than significant and as such, the Project would not conflict with Policy N to provide vibration mitigation measures to mitigate adverse impacts.

Access for all fire safety emergency vehicles would be available along the adjacent National, Venice, and Washington Boulevard rights-of-way and via a fire access road in the existing Helms alley at the east edge of the Project Site. Building floor plans would be submitted to the Fire Marshal prior to the issuance of any certificate of occupancy. The Project would comply with the City's Section 9.02.040 Amendment of Chapter 9 of the California Fire Code, which under Section 901.4.1.1 requires that an automatic fire-extinguishing (sprinkler) system shall be installed in every new building in the City, regardless of area separation or type of construction. The Project would also implement any improvements to the exiting water delivery system to meet fire flow requirements that would ensure sufficient water supply as determined by the Fire Marshal. Therefore, the Project would not conflict with Policy VII, Fire Safety, to ensure fire safety and access. Therefore, the Project would not conflict with DFD policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the DFD Plan would be less than significant.

Culver City TOD Visioning Study and Recommendations

As evaluated in detail in Table LU-6, *Consistency of the Project with Applicable Policies of the Culver City TOD Visioning Study and Recommendations Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of this plan. The Table LU-6 evaluation is provided in Appendix J of this Draft EIR. In summary, the Project is within walking distance of the Metro "E" Line Culver City Station, located 600 feet to the southwest of the Project Site. The Project would widen and provide for pedestrian-oriented landscaping and lighting along Venice and National Boulevard, and the location of publicly accessible, privately maintained amenity area at Washington Boulevard. With widened and landscaped sidewalks along National Boulevard; pedestrian-oriented planting beds; broad, and recessed main entrances at sidewalk level into the Project from both Venice and National Boulevards; the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while as open and transparent as viewed from a distance.; and lighting for pedestrian security and wayfinding along the Project's street edges, the Project would not conflict with policies to improve walkability, improve pedestrian safety, and encourage circulation on foot.

The Project would intensify the use of the exiting Project Site with office buildings and higher occupancy within 600 feet of the Metro "E" Line Culver City Station and a variety of other transit and cycling options. The Project would provide a total of 175 bicycle parking spaces, including 51 spaces in Building 1 and 124 bicycle parking spaces in Building 2. The Project proposes two driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and the construction of one new driveway and curb cut adjacent to the existing Helms alley driveway along Venice Boulevard. All driveways would be right-turn only and with the limited curb cuts and would reduce conflicts between motor vehicles and bicycles within the existing bike paths and pedestrians along National and Venice Boulevards. Therefore, the Project would not conflict with policies to increase development and employee density in proximity to the Metro "E" Line Culver City Station; improve the efficiency and convenience of transit as a mobility option; and improve convenience, safety, and efficiency of a cycling infrastructure and biking as an alternative mobility option.

The Project would provide 7,120 sf of landscaped, publicly accessible, privately maintained amenity area. This amenity area would be directly accessed from the Washington Boulevard sidewalk. The landscaped amenity area would enhance the pedestrian link between the Helms Bakery Complex (a commercial/retail center) and the Ivy Station development and the Metro "E" Line Culver City Station. It would also open the existing views of the Helms Bakery Building from Washington Boulevard. With the inclusion of this open space, the Project would not conflict with the policy to maintain Washington Boulevard as a principal spine of the TOD area.

The Project would increase the intensity of land use and occupancy (with capacity for approximately 2,400 employees) in proximity to the Metro "E" Line Culver City Station. The Project would provide for high quality architecture and pedestrian-oriented improvements, such as sidewalk widening, additional canopy street trees along National Boulevard and Venice Boulevard (including a double row, or colonnade, of trees on Venice Boulevard), and pedestrian lighting. The proposed buildings would feature Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while as open and transparent as viewed from a distance. The main entrances on National and Venice Boulevards would be located within deep, pedestrian-oriented, landscaped setbacks along each street frontage. These entrances would enhance and welcome pedestrians directly from the adjacent sidewalks. In addition, the Project would implement a voluntary TDM Program (refer to Project Design Feature TRAF-PDF-2) to reduce vehicle trips. Therefore, the Project would not conflict with policies to guide development within the TOD area; to define and design certain improvements that address mobility; and to encourage, facilitate and promote the use of alternative mobility modes. Therefore, the Project would not conflict with Culver City TOD policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the Redevelopment Plan would be less than significant.

Culver City Municipal Code

The Culver City Parcel is located in the IG Zone and has a General Plan designation of Commercial Center, which anticipates a commercial use. A section of the Culver City Parcel is located within the -EW overlay. The -EW 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 overlay in the IG Zone.

Setback requirements for IG parcels within the -EW overlay, according to CCMC Section 17.230.020, Table 2-9, are 5 feet at the front yard (which would be either National Boulevard or Washington Boulevard) with no side yard or rear yard setback requirements. Buildings are required on the common Washington Boulevard/private property line, except that the Director may approve the setback modifications on a Washington Boulevard parcel frontage, to accommodate urban amenities including plazas, hardscape or landscape, fountains, benches, outdoor dining, or other pedestrian amenities. With the provision of 7,120 sf of publicly accessible, privately maintained amenity area along the Project Site's entire Washington Boulevard frontage, the development would not conflict with the current setback requirement. However, the Project would not include a structure fronting Washington Boulevard. Building 1 within the Culver City Parcel would be primarily separated from Washington Boulevard by the four-story 8777 office building and have no frontage on Washington Boulevard.

In order to provide a unified development and land use consistent with the General Plan's Community Commercial land use designation, the Project is seeking a zone change and Zoning Map Amendment to Planned Development or PD. The Project would not conflict with CCMC Sections 17.240.010 and 17.240.015 to allow large scale residential and commercial complexes within a physically integrated and contiguous area and which may only be applied to sites of 1 acre or greater. The Project would be rezoned to the PD and because Building 1 in the Culver City Parcel would be limited to 56 feet and utilities would be located underground, the Project would also not conflict with policies that limit the heights of buildings in the PD zone to 56 feet in height and require that all utilities within the limits of a PD zone be located underground. Building 1 would include a parapet that would be 10.5 feet above the roof of Building 1 that would not exceed 15 percent of the roof area. CCMC Section 17.300.025.C.4 provides that in non-residential zones, architectural features that are non-habitable design elements, such as spires, turrets, bell towers, clock towers, cupolas and similar design elements, as determined by the Director of Planning, shall be allowed, up to a maximum of 13 feet, 6 inches above the height of a building, and limited to 15 percent of the total roof area. The Project would not conflict with this applicable regulation.

In addition, the Project is seeking approval of a land use permit for extended construction hours per CCMC Section 9.07.035.C.1. Per CCMC Section 9.07.035.A allowed construction hours are 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. The Project includes a request to extend construction hours from as early as 7:00 a.m. through 10:00 p.m.. The request to extend construction hours is a land use permit that will accompany the requested zone change map amendment and comprehensive plan entitlements through the review process. Refer to Section 4.10, *Noise*, of this Draft EIR for a discussion of noise impacts associated with the potential for extended construction hours.

The Project would not result in a potentially significant environmental impact due to a conflict with the existing zoning designation and zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, land use impacts with respect to the CCMC would be less than significant.

Los Angeles General Plan Framework Element

As evaluated in detail in Table LU-7, *Comparison of the Project to Applicable Policies of the City of Los Angeles General Plan Framework Element Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of the General Plan Framework Element. The Table LU-7 evaluation is provided in Appendix J of this Draft EIR. In summary, the development of the City of Los Angeles parcel would not conflict with policies of the Land Use Chapter related to the spatial distribution of development to facilitate a reduction of vehicle trips, VMT, and air pollution in that it is located within a SCAG-defined HQTA and City of Los Angeles-defined TPA, and within 600 feet of the Metro "E" Line Culver City Station. The TPA encourages redevelopment and growth near transit facilities to reduce reliance on the automobile. The Project would provide 175 bicycle parking spaces for employees and visitors and would include sidewalk widening, canopy trees and other landscaping along National and Venice Boulevards (including a double row, or colonnade, of trees along Venice Boulevard), and would not conflict with policies that provide for land use patterns that emphasize transit, and pedestrian/bicycle access. The Project's four- and five-story buildings would be consistent in scale to the six to seven-story Ivy Station mixed-use project (across National Boulevard from the Project Site), the adjacent four-story 8777 Washington office building, and the five-story Access Culver City mixed use development located south of Washington Boulevard, south of the Project Site and, thus would not conflict with policies that encourage new development to maintain the prevailing scale and character of the City's stable neighborhoods. The Project would not conflict with policies of the Urban Form and Neighborhood Design Chapter to maintain good visual connections between the adjacent sidewalks and the Project by providing full height glazing which would allow for an open appearance and engage the adjacent sidewalks, while being open and transparent as viewed from a distance.

The Project would not conflict with policies of the Open Space and Conservation Chapter in that it would contribute to sustainability with City's natural settings from the encroachment of urban development, and would contribute to the sustainability of the region with LEED Gold equivalent construction (refer to Project Design Feature GHG-PDF-1), compliance with the Los Angeles Green Building Code, and CALGreen Building Code, installation of high efficiency plumbing fixtures, EV charging, EV capable and EV ready spaces and bicycle facilities and use of native and drought tolerant landscaping. The Project would handle surface water runoff in accordance with the City's Low Impact Development (LID) Ordinance to improve the quality of stormwater entering the existing drainage system. A total of three street trees along the Culver City parcel on National Boulevard and seven street trees along the Los Angeles parcel on Venice Boulevard would require removal for future sidewalk improvements. The tree removal on the Los Angeles parcel would be subject to City of Los Angeles Urban Forestry requirements and approval of the Board of Public Works. The Project would replace removed street trees at a ratio of 2:1 and would incorporate 7,120 sf of publicly accessible, privately maintained amenity area. In addition, the Project would provide bicycle parking and would not encroach on the area's existing bicycle lanes or the future extension of the Ballona Creek bike path to Venice Boulevard. The Project would not conflict with policies related to stormwater management through capturing, treating, and reusing surface water runoff and, thus, would reduce surface runoff and quality compared to existing conditions. The Project would not conflict with policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the Framework Element would be less than significant.

Los Angeles General Plan Conservation Element

As evaluated in detail in Table LU-8, *Consistency of the Project with Applicable Policies of the Conservation Element of the General Plan Intended to Avoid or Mitigate an Environmental Effect,* the Project would not conflict with applicable policies of the Conservation Element. The Table LU-8 evaluation is provided in Appendix J of this Draft EIR. In summary, the Project would implement the City's standard conditions of approval relative to any discovered archaeological or paleontological resources and thus would not conflict the policy to protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes. The Project would implement a Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs), which would not conflict with policies to reduce erosion and protect the watershed. The Project Site, which features a flat topography and existing developed buildings, has limited view vantage points across the existing developed Project Site. As such, the Project would not conflict with policies to protect and reinforce natural and scenic vistas or policies to protect natural landforms.

In addition, because the Project Site does not contain any historic resources, the Project would not conflict with policies to protect existing on-site historic features. The historic Helms Bakery Complex, which fronts on both Venice and Washington Boulevards, is located across the existing Helms alley to the east of the Project Site. The existing building adjacent to the Helms Bakery Building is setback less than three feet from the Venice property line and located approximately 24 feet from the Helms Bakery Building. The typical frontage of Building 2 will be set back nine feet, six inches from the Venice property line and located 55 feet to the west of the Helms Bakery Building. With the demolition of the existing building and the Project's increased setback and separation, the Helms Bakery Building would be more visible from eastbound Venice Boulevard than under existing conditions. In addition, with the demolition of the on-site building on Washington Boulevard (8771 Washington) and the conversion of this location to permanent open space, the Helms Bakery Building's Washington Boulevard frontage would also become more visible from eastbound Washington Boulevard. Development of the Project would not block any existing views of the historic building or directly or indirectly effect the historic context or contribution of Helms Bakery Complex (refer to Section 4.3, *Cultural Resources*, of this Draft EIR). The Project would not conflict with policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the Conservation Element would be less than significant.

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Health and Wellness Element provides objectives and implementation programs to elevate health as a priority for the City's future growth and development. Consistent with the City's health objectives, the Project is located within walking distance of the Metro "E" Line Culver City Station and in proximity to existing bike lanes in Venice Boulevard, Jefferson Boulevard, and Washington Boulevard. The Project would also include 175 bicycle parking spaces. The proximity to transit and bicycle lanes would accommodate walking and biking to and from work. In addition, the Project would provide a 7,120 sf publicly accessible, privately maintained amenity area along Washington Boulevard, as well as 51,600 sf of private open space within a central courtyard that would allow a greater circulation of fresh air throughout the Project. Because the proximity to the Metro "E" Line Culver City Station and bike lanes, the provision of bicycle parking, and the design

of the Project around a central open space would contribute to human health, the Project would not conflict with the policies of the Health and Wellness Element.

West Adams–Baldwin Hills–Leimert Community Plan

As evaluated in detail in Table LU-9, *Consistency of the Project with Applicable Policies of the West Adams–Baldwin Hills–Leimert Community Plan Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of the Community Plan. The Table LU-9 evaluation is provided in Appendix J of this Draft EIR. The Project, which is designated as Community Commercial in the Community Plan, would not conflict with policies applicable to that designation. In addition, Figure 1-3, General Plan Framework Map, in the West Adams–Baldwin Hills–Leimert Community Plan shows the Project Site as located within a "Community Center (Transit-Oriented Development Area, Commercial Node)" in conformance with the General Plan Framework Element land use designation for the area and the Community Plan sets forth policies that are applicable to such Community Centers. In summary, the Project would not conflict with policies to conserve, enhance, and regenerate its "main street" character by promoting continued pedestrian orientation. The Project would incorporate sidewalk widening and improvements, install a double sidewalk and double row (colonnade) of street trees along Venice Boulevard, increase street trees and widen the Venice Boulevard sidewalk and landscaped parkway to a consistent 28 feet.[14] The Project would broaden the existing 7-foot sidewalk on National Boulevard to an 8-foot sidewalk and 7-foot landscaped parkway in both the City of Los Angeles and Culver City sections to 15 feet. provide pedestrian-oriented planting beds along the sidewalks, include broad and landscaped main entrances oriented toward the sidewalk, include glass exterior walls that provide visual access into common area building interiors, and include lighting for pedestrian security and wayfinding. The Project would enhance a pedestrian link between the retail uses in the Helms Bakery Complex and the Ivy Station development.

The Project would not conflict with policies to strengthen the community's commercial sector as it will not detract from the area's historic and cultural character. Further, the Project would enhance the use of the Project Site with the development of the newer and larger buildings. The Project would be consistent with policies to avoid nuisance uses and to maintain and increase the area's commercial employment base with the development of 536,000 sf of office floor area and capacity for approximately 2,400 employees. The Project would not conflict with policies to expand market opportunities for both traditional existing businesses and emerging new businesses. The Project would not conflict with policies to promote pedestrian activity by incorporating streetscape improvements, open character in the building's street-oriented windows and design (full height glazing would allow for an open appearance and engage the adjacent sidewalks, while being open and transparent as viewed from a distance), and sidewalk access to the buildings. The Project would not conflict with policies to prioritize development close to transit, and because the Project would implement USGBC LEED Gold equivalent construction (refer to Project Design Feature GHG-PDF-1); comply with the Los Angeles Green Building Code, and CALGreen Building Code 2019; install high efficiency fixtures; provide EV charging, EV capable, and EV ready parking spaces and bicycle facilities; and plant native, Mediterranean, and drought tolerant landscaping, the Project

[14] Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and adjacent planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot, 6-inch landscaped parkway, 13 feet of sidewalk, and a 7-foot landscaped planter, for a total of 28 feet.

would not conflict with polices to promote principles of "green" development. Because the Project would intensify development and employment opportunities on an infill urban site within a commercial node and designated transit-oriented district, (described in the Community Plan from the General Plan Framework Element) the Project would not conflict with policies that encourage new development in established commercial centers and transit-oriented development and to enhance the appearance and safety of community commercial nodes, centers and transit-oriented development areas. The Project would not conflict with policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the West Adams–Baldwin Hills–Leimert Community Plan would be less than significant.

West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay District

As noted above, the Los Angeles Parcel is located within the CPIO. The CPIO is a zoning tool intended to provide supplemental development and use regulations tailored to the Community Plan Area. It targets individual neighborhoods and corridors, and may help address concerns about the scale, size, and character of development based on a community's specific needs.

As evaluated in detail in Table LU-10, *Consistency of the Project with Applicable Purposes of the West Adams–Baldwin Hills–Leimert Community Plan Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable purposes of the CPIO. The Table LU-10 evaluation is provided in Appendix J of this Draft EIR.

The Project is located in the Venice/National TOD Subarea Parcel Group A. Because the CPIO is also part of the Project's zoning designation, the Project is compared in detail to CPIO policies and standards under the discussion of the LAMC, below. The Project would be required to meet specific requirements of the CPIO zoning designation as determined by the Los Angeles Planning Director. The Planning Director would take into consideration the Project's proposed setback and FAR amendments discussed in the LAMC discussion, below. If the amendments are approved, the Project would not conflict with the purposes of the CPIO. As discussed in the evaluation of the LAMC, below, with approved amendments, impacts with respect to the CPIO would be less than significant.

Exposition Corridor Transit Neighborhood Plan

As discussed in Chapter 2, *Project Description*, Section 2.8, *Anticipated Project Approvals*, the Project Applicant is seeking a boundary change to remove the Project from the Expo Corridor Transit Neighborhood Plan. Nevertheless, the Project is evaluated in detail in relation to this plan in Table LU-11, *Consistency of the Project with Policies of the Exposition Corridor Transit Neighborhood Plan Intended to Avoid or Mitigate an Environmental Effect*. the Project would not conflict with applicable policies of this plan. The Table LU-11 evaluation is provided in Appendix J of this Draft EIR. The Project would provide new commercial growth and an employment center within 600 feet of the Metro "E" Line Culver City Station. The Project would implement a voluntary TDM Program (refer to Project Design Feature TRAF-PDF-2) to reduce vehicle trips and would widen and landscape the sidewalks and parkways along National and Venice Boulevards, the primary pedestrian routes between the Project Site and the Metro "E" Line Culver City Station (and between the Helms Bakery Complex and the Metro "E" Line Culver City Station). The Project would incorporate a total of 175 bicycle parking spaces. These measures would encourage use of

transit, walking, and bicycling and, thus, would not conflict with policies to direct growth and accommodate new commercial development near transit stations; to reduce greenhouse gas emissions by facilitating alternative modes of transportation and decreasing automobile dependence; and to encourage walking and bicycling as a means to safely and conveniently circulate within and between neighborhoods and to access transit.

Street improvements, including a double row (colonnade) of shade trees within the Venice Boulevard sidewalk and parkway, increasing the National Boulevard sidewalk and parkway from 7 to 15 feet, and providing 7,120 sf of landscaped, publicly accessible, privately maintained amenity area with seating off Washington Boulevard would encourage pedestrian access to the Project Site and would not conflict with policies to ensure new development is pedestrian-oriented and provides publicly accessible amenity areas, and other community facilities for socializing, placemaking, and community building. With the Project's setback from, and design and materials, including color palette and modernity, the Project would not impact the integrity of setting, feeling or association of the historic building. The Project would feature primarily full height glazing would allow for an open appearance and engage the adjacent sidewalks, while as open and transparent as viewed from a distance. The Project would provide for street-oriented, prominent, and landscaped entrances on National and Venice Boulevards. Note that the Exposition Corridor Transit Neighborhood Plan's development standards would not be applicable with the approval of the Project's anticipated project approvals discussed in Chapter 2, Section 2.8, of the Draft EIR.

As shown in Table LU-11, the Project would not conflict with policies of the Exposition Corridor Neighborhood Transit Plan adopted to reduce or eliminate environmental impacts. Impacts with respect to this land use plan would be less than significant.

Los Angeles Municipal Code

The Los Angeles Parcel is zoned C2-2D-CPIO. The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production. The Project's proposed office uses are permitted in the C2 zone.

The "2D" designation following the C2 zone designates Height District 2 with limitation in floor area of six times the buildable area of the property. LAMC Section 13.14 establishes the Community Plan Implementation Overlay (CPIO) District. Section of 12.04 (Zones-Districts - Symbols), Subsection D. establishes the CPIO district by the provision of Article 3 of the Zoning Code. The CPIO designation, discussed below, establishes further zoning restrictions on the Los Angeles Parcel. The "D" limitation provides that new uses and development projects shall comply with the CPIO, including the Venice/National TOD Subarea regulations.

The CPIO identifies the Los Angeles Parcel as being located within the CPIO's Venice/National TOD subarea. Upon approval of the proposed CPIO amendment, the Project would be consistent with all applicable zoning standards. The applicable CPIO's zoning standards related to the CPIO designation are evaluated below, as well as in Table LU-10 in Appendix J of this Draft EIR.

- CPIO Section VI-2A, Figure VI-2, identifies the Los Angeles Parcel as "Parcel Group A" with maximum permitted building heights of up to 150 Feet (CPIO Section VI-2A.A.1.a). CPIO Section VI-2.A.2.a (Transitional Height) establishes transitional height requirements for Parcel

Group A. Building frontages shall have a maximum height of 55 feet (CPIO Section VI-2.A.2a.1). The height of the building frontage of Building 2 on the Los Angeles parcel would be substantially consistent at 56 feet. In addition, this standard relates to urban form and aesthetics. As set forth in Section 4.1, *Aesthetics,* of this Draft EIR, the Project is an employment center project located within a transit priority area. Therefore, the Project's aesthetic impacts are deemed to be less than significant under SB 743. Moreover, upon approval of the proposed CPIO amendment, the Project would comply with the building frontage standard. Therefore, the Project would not conflict with this requirement.

For buildings located within 150 of an intersection (as is the Los Angeles parcel) building heights are limited to 75 feet (CPIO Section VI-2.A.2.a.2). Building 2 would be 75 feet high with a minimum 9-foot stepback over 56 feet and would therefore not conflict with this requirement.

- The Project would not strictly comply with CPIO Section IV-2A.2.a.5 (Helms Bakery Building Setback/Step-back), which requires a 5-foot "step back" from the Helms Bakery Building at 30 feet above the sidewalk grade, or the prevailing height of the Helms Bakery Building. The purpose of this stepback is to preserve existing views of and avoid potential impacts on the historic Helms Bakery Building. Building 2 would not provide a step back at the 3rd floor. However, Building 2 would be set back a minimum of 33 feet from the east property line shared with the Helms Bakery Building and would be located approximately 55 feet from the Helms Bakery Building. The Project is seeking an amendment to Section IV-2A under Anticipated Project Approvals (Section 2.8 of Chapter 2, *Project Description*, of this Draft EIR to allow more setback flexibility). In addition, the increased setback along Venice Boulevard would increase views of the Helm Bakery Building from eastbound Venice Boulevard as compared to existing conditions. As discussed in Section 4.3, *Cultural Resources*, of this Draft EIR, the Project's commercial use and scale would not conflict with the commercial use or scale of the Helms Bakery Building and Complex. The Project would not physically impact or materially impair the Helms Bakery Building and would have no impact on its integrity of location, design, workmanship, or materials. Moreover, upon approval of the proposed CPIO amendment, the Project would comply with this setback standard. Therefore, the Project would not conflict with this CPIO regulation.
- CPIO Section VI-2.B (Building Density & Intensity) allows a maximum floor area ratio (FAR) on the Los Angeles Parcel of 3:1 (Table VI-2.1) if the parking is located below grade onsite. Building 2 would provide all its parking below grade onsite and include 369,000 sf of floor area on a 123,318-sf parcel, which would result in a floor area ratio (FAR) of 2.99:1. The FAR is contingent upon a proposed amendment to the CPIO to confirm that exterior balconies are not considered floor area. With the proposed amendment, the FAR would not conflict with the CPIO's FAR limitation.
- CPIO Section VI-2.C (Building Disposition) requires a minimum lot coverage of 50 percent for new development (Section IV-2.C.1.a). Building 2 would result in a lot coverage of 67 percent, which would not conflict with this regulation. Consistent with this standard, the Project open space would be located no more than three feet above or below adjacent sidewalk grade. All of the open space would be at grade. The public open space would be designed to enhance linkages to the Metro "E" Line Culver City Station.
- CPIO Section VI-2.D.1.a (Sidewalk Frontage) a requires a maximum setback for the Primary Frontage from the sidewalk of two feet. The Project is seeking an amendment to this standard to allow a maximum Primary Frontage setback of 2 feet, six inches. This standard relates to urban form and aesthetics. As set forth in Section 4.1, *Aesthetics*, of this Draft EIR, the Project is an employment center project located within a transit priority area. Therefore, the Project's

aesthetic impacts are deemed to be less than significant under SB 743. Moreover, upon approval of the proposed CPIO amendment, the Project would comply with Primary Frontage standard. Therefore, the Project would not conflict with this requirement.

- Subsection 1.b provides that for any street facing façade that is accessible to the public, the maximum Primary Frontage setback may be exceeded by up to 20 feet along any portion of the lot line that abuts any Pedestrian Amenities incorporated into the Project. In compliance with this standard, Building 2's exterior building wall on National Boulevard would be set back 12 feet from the National Boulevard property line. Building 2's exterior building wall on Venice Boulevard would be set back up to 32 feet from the Property line to accommodate the recess entryways. However, Building 2 would meet the intent of this requirement to promote pedestrian access, as the Venice Boulevard frontage would include an 8-foot planted parkway, a 5-foot sidewalk, a 7-foot landscape planted parkway and a second sidewalk measuring 8 feet in width (for a total 13 feet of sidewalk). The Venice Boulevard frontage would be planted with a double row (colonnade) of trees to enhance pedestrian enjoyment of the sidewalk. Moreover, upon approval of the proposed CPIO amendment, the Project would comply with this Sidewalk Setback standard. As such, the Project would not conflict with this regulation.
- CPIO Section IV.D.3 (Building Façade Articulation) requires building facades of to be broken into a series of appropriately scaled buildings or recessed Pedestrian Amenities areas such that Ground Floor elevations do not exceed more than 250 feet in length. The façade of Building 2 would exceed 250 feet. Pedestrian amenities would include improving and widening the sidewalks and parkways along Venice and National Boulevards, the installation of new street trees along these frontages, including a colonnade of trees along Venice Boulevard, and landscaped planters. The Project's amenity area on Washington Boulevard would serve as a pedestrian amenity in that it would be directly accessible to the public from the Washington Boulevard sidewalk and provide a small park-like setting with seating, and which could include a combination of coffee kiosk or flexible programed activities. However, as shown in Figure 2-3, *Conceptual Site Plan*, in Chapter 2 of this Draft EIR, the street-facing walls on Venice and National Boulevards would be broken up by recessed pedestrian entrances measuring 144 feet in length and 32 feet in depth on Venice Boulevard and 40 feet in length, and varying 34 to 45 feet in depth on National Boulevard. Therefore, the Project would meet the intent of this standard, which relates to urban form and aesthetics. As set forth in Section 4.1, *Aesthetics*, of this Draft EIR, the Project is an employment center project located within a transit priority area. Therefore, the Project's aesthetic impacts are deemed to be less than significant under SB 743. Moreover, upon approval of the proposed CPIO amendment, the Project would comply with Building Façade Articulation standard. Therefore, the Project would not conflict with this standard.
- CPIO Section IV.D.4 (Pedestrian Oriented Ground Floor) requires the Ground Floor of the Primary Frontage to incorporate public interior spaces (such as, public access areas, lobbies, or spaces used for Commercial Uses or Community Facilities) to be no more than three feet above or below the grade of the abutting public sidewalk grade and facing the Primary Frontage street. Public interior spaces shall face the street. Pedestrian entrances shall be no more than three feet above or below the grade of the abutting public sidewalk grade and shall face the Primary Frontage street. The facade shall have a minimum of 30 percent clear and non-reflective storefront glazing, except for Commercial or Mixed-Use Projects, which shall have a minimum of 50 percent clear and non-reflective storefront glazing. Building 2 would meet or exceed this requirement. Therefore, the Project would not conflict with the CPIO standard related to Pedestrian Oriented Ground Floors

- CPIO Section IV-2.E.1, Table VI.2.2, *Summary of Vehicular Parking Standards*, shows that all-commercial uses in Parcel Group A have a maximum allowable parking of 90 percent of the LAMC required parking in the underlying zone. The Project would provide a total of 1,216 vehicular parking spaces. The LAMC Section 12.21.A.4(c) requires one vehicle parking space per 500 sf of floor area. Building 2 would provide 369,000 sf of office uses and 738 vehicular parking spaces, which represents a ratio of 1 vehicle parking space per 500 sf, consistent with LAMC requirements, or 100 percent of LAMC-required parking. As such, the Project is seeking an amendment to the CPIO. Because parking is not an environmental issue subject to CEQA for projects within a TPA, the Project would not conflict with a CPIO regulation adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, the Project would meet the intent of this standard to promote active and transit modes. The Project's location along a transit-rich corridor, pedestrian-oriented frontage, and proximity to bicycle facilities would encourage the use of these modes. Further, the Project would implement a TDM Program to further reduce vehicle trips to and from the Project Site (refer to Project Design Feature TRAF-PDF-2). The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by constructing increased sidewalk and parkway widths, and planting enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Moreover, upon approval of the proposed CPIO amendment, the Project will comply with the CPIO parking standards. Therefore, the Project would not conflict with this standard.
- CPIO Section IV-2.E.2.e (Parking Location and Access) requires that parking structures located below grade may occupy the entire footprint of the Site and E.2.f provides that access driveways shall be taken from alleys or side-streets where present. Driveway widths shall not exceed 30 feet. The Project would locate subterranean parking below the footprints of each parcel (the Los Angeles and Culver City Parcels). Building 2 would take access to and from the alleyway at the east edge of the Project Site. The driveway would be 28 feet in width. Therefore, the Project would not conflict with the parking structure and access requirements of the CPIO.

The Project would not result in a potentially significant environmental impact due to a conflict with the existing LAMC or CPIO provisions adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, land use impacts with respect to the LAMC and CPIO would be less than significant.

Mitigation Measures

Impacts regarding land use and planning were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding land use and planning would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, provides a list of projects that are planned or are under construction in the Project area, within an approximately 1.5-mile radius. These projects are summarized in Table 3-1, *Related Projects List*, and mapped on Figure 3-1, *Related Projects Map*. As shown, 52 related projects occur within 1.5-mile radius study area, including 34 related projects in Culver City and 18 related projects in the City of Los Angeles. A high number of the related projects are mixed use, combining residential and office or retail/restaurant uses. Also represented in the list of related projects are a large number of creative office (media industry) uses as well as individual restaurants, schools, theater, and other uses representing a minor proportion of the related projects. The 52 related projects represent infill development within the urbanized areas of Culver City and the City of Los Angeles. The higher density of new development also reflects the location of the City of Culver City and City of Los Angeles related projects within the SCAG-defined HQTA and the high availability of transit and variety of transportation options serving Culver City, including I-10 and San Diego Freeway (I-405), and light rail.

The Project would increase utilization of the Project Site and would represent infill development on an already urbanized site within proximity to the Metro "E" Line Culver City Station and multiple regional and local bus lines. In addition, the Project includes the provision of landscaping, open space, bicycle, and pedestrian amenities within an HQTA. The Project would be consistent with both the Culver City and Los Angeles General Plans' land use, the proposed Culver City zoning designation of PD, and proposed CPIO revised development standards. The Project would also be consistent with other local and regional land use plans as discussed above.

The related projects are subject to CEQA review and review by the agencies and departments of the city (Culver City or City of Los Angeles) with jurisdiction. Most notably, related projects seeking increases in permitted densities or change in land use in Culver City are subject to review by the Culver City Planning Commission and other City departments and divisions for consistency with plan provisions and other City requirements. Related projects within the City of Los Angeles would be subject to similar regulatory processes as those within Culver City. The related projects identified in this Draft EIR represent infill development and as such are consistent with local and regional policies to concentrate development near public transit and encourage alternative transportation. Based on this and based on the determination that the Project would not conflict with the adopted land use plans and zoning, cumulative impacts regarding conflict with policies and regulations adopted to avoid or mitigate and environmental effect would be less than significant.

Mitigation Measures

Cumulative impacts regarding land use and planning were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts regarding land use and planning would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.10 Noise

4.10.1 Introduction

This section of the Draft EIR analyzes potential noise and vibration impacts that could result from the Project. The analysis describes the existing noise environment in the vicinity of the Project Site, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project, evaluates the potential for significant impacts, and includes mitigation measures to address significant impacts. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical data used in this analysis are provided in Appendix K of this Draft EIR.

4.10.2 Environmental Setting

Noise and Vibration Basics

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics primarily addresses the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling and pain, respectively. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[1]

The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of

[1] California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.1.3

frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements. Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure 4.10-1**, *Decibel Scale and Common Noise Sources*.

Noise Exposure and Community Noise

Community noise exposure is typically measured over a period of time; a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many unidentifiable individual contributors. Single-event noise sources, such as aircraft flyovers, sirens, etc., may cause sudden changes in background noise level.[2] However, generally, background noise levels change gradually throughout the day, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume.

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project:

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour ($L_{eq(1h)}$). The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

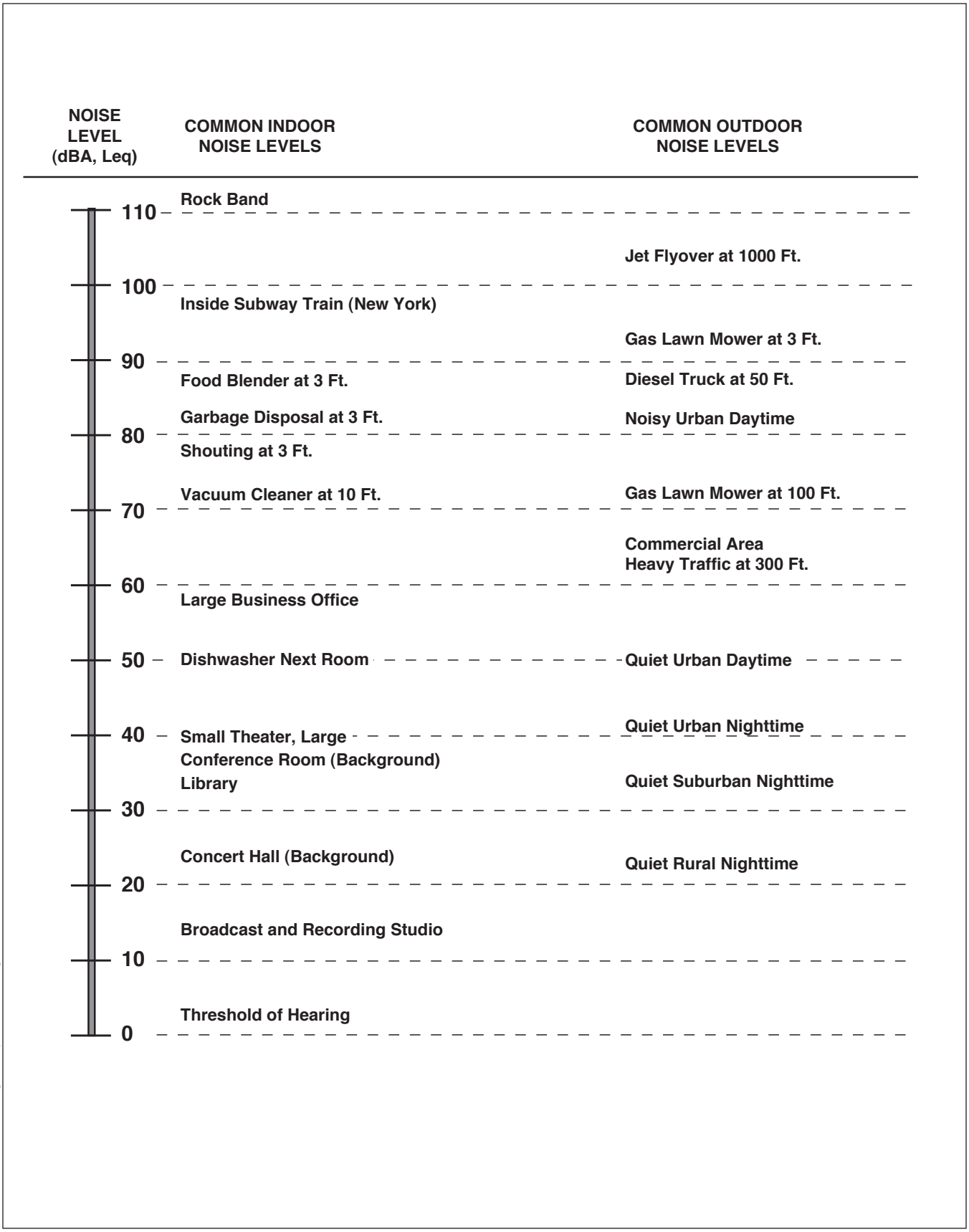
L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 p.m. and 7:00 a.m. to account nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. and 10:00 p.m. and an addition of 10 dB to noise levels between the hours of 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

[2] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.2.1.



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SOURCE: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf

Crossings Campus

Figure 4.10-1
Decibel Scale and Common Noise Sources

ESA

Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into the following four general categories:

1. Subjective effects (e.g., dissatisfaction, annoyance)
2. Interference effects (e.g., communication, sleep, and learning interference)
3. Physiological effects (e.g., startle response)
4. Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep.[3]

The World Health Organization's Guidelines for Community Noise details the adverse health effects of high noise levels, which include hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g., feelings of helplessness, aggressive behavior), and annoyance.[4]

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:[5]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived.
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference.

[3] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.2.1.

[4] World Health Organization (WHO), Environmental Noise Guidelines for the European Region, edited by Dr. Zsuzsanna Jakab, WHO Regional Director for Europe, 2018.

[5] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.2.1.

- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in ambient noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dBA scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source. [6]

Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of the distance (6 dBA/DD). This decrease, resulting from the geometric spreading of the energy over an ever-increasing area, is referred to as the inverse square law. For a point source the energy per unit area is inversely proportional to the square of the distance. Taking 10log10(1/4) results in a 6-dBA/DD reduction. This is the point source attenuation rate for geometric spreading.

Noise attenuation from ground absorption and reflective wave cancellation adds to the attenuation from geometric spreading. Traditionally, this excess attenuation has been expressed in terms of decibels of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, the prediction results based on this scheme are sufficiently accurate. The sum of the geometric spreading attenuation and excess ground attenuation (if any) is referred to as the attenuation or drop-off rate. For distances of 200 feet or more, the approximation causes excessive inaccuracies in predictions. The amount of excess ground attenuation depends on the height of the noise path and characteristics of the intervening ground or site. In practice, excess ground attenuation may vary from 0 to 8–10 dBA/DD or more. In fact, it varies as the noise path height changes from the source to receiver and with vehicle type because the source heights are different. The complexity of terrain also influences the propagation of sound by potentially increasing the number of ground reflections. [7]

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as "line" sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading." The

6 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.2.1.1.
7 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.1.4.2.

movement of the vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over a time interval. This results in cylindrical spreading rather than spherical spreading. Because the change in surface area of a cylinder only increases by two times for each doubling of the radius instead of the four times associated with spheres, the change in sound level is 3 dBA/DD.[8] Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Structures (e.g., buildings and solid walls) and natural topography (e.g., hills and berms) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), barrier insertion loss would still occur but to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall can reflect noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a larger barrier.[9] Additionally, structures with closed windows can further attenuate exterior noise by a minimum of 20 dBA to 30 dBA.[10]

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances (e.g., more than 500 feet). Other factors such as air temperature, humidity, and turbulence can also have significant effects on noise levels.[11]

Vibration Fundamental

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (FTA 2018), groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.[12] In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and construction activities, such as blasting, pile-driving, and

8 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.1.4.1.

9 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Sections 2.1.4.24 and 5.1.1.

10 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 7.4.2, Table 7-1.

11 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Section 2.1.4.3.

12 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, Prepared by John A. Volpe National Transportation Systems Center, September 2018, Section 7.1.3.

operation of heavy earth-moving equipment. Groundborne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance from the source of the vibration.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity.[13] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially historic buildings and older non-engineered timber and masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[14]

Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[15] The relationship between groundborne vibration and groundborne noise depends on the frequency of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.[16] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding Noise at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Noise Control Act of 1972
- Federal Transportation Administration Vibration Standards
- Occupational Safety and Health Act of 1970
- Office of Planning and Research Guidelines for Noise Compatible Land Use
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

[13] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Section 5.1.
[14] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Sections 6.1, 6.2, and 6.3.
[15] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Section 5.4.
[16] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Table 6-3 and Table 6-14.

- Culver City Municipal Code
- Culver City General Plan Noise Element
- City of Los Angeles Municipal Code
- City of Los Angeles General Plan Noise Element

Federal

Noise Control Act of 1972

Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (USEPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare in residential areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA.[17] These guidance levels are not standards or regulations and were developed without consideration of technical or economic feasibility. There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. Moreover, the federal noise standards are not reflective of urban environments that range by land use, density, proximity to commercial or industrial centers, etc. As such, for purposes of determining acceptable sound levels to determine and evaluate intrusive noise sources and increases, this document utilizes both the City of Culver City and the City of Los Angeles Noise Regulations, discussed below.

Federal Transportation Administration Vibration Standards

There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the Project. However, FTA has adopted vibration criteria that are commonly used to evaluate potential structural damage to buildings by building category from construction activities. The vibration damage criteria adopted by FTA are shown in **Table 4.10-1**, *Construction Vibration Damage Criteria*.

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from ground-borne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.[18] The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that

[17] United States Environmental Protection Agency (USEPA), EPA Identifies Noise Levels Affecting Health and Welfare, EPA Press Release – April 2, 1974, https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html#:~:text=The%20document%20identifies%20a%2024,preventing%20activity%20interference%20and%20annoyance, last updated on September 14, 2016.

[18] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Table 6-1, p. 124.

do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land use categories are shown in **Table 4.10-2**, *Groundborne Vibration Impact Criteria for General Assessment*. No thresholds have been adopted or recommended for commercial or office uses.

TABLE 4.10-1
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (inch/sec)	Approximate L_V[a]
Reinforced-concrete, steel or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

PPV = peak particle velocity; L_V = velocity in decibels; inch/sec = inches per second

[a] Root-mean-square velocity in decibels (VdB) re 1 microinch per second.

SOURCE: Federal Transit Administration. Table 7-5, *Transit Noise and Vibration Impact Assessment* (2018).

TABLE 4.10-2
GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

[a] "Frequent Events" is defined as more than 70 vibration events of the same source per day.

[b] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

[c] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 United States Code [USC] Sections1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.[19]

[19] United States Department of Labor, Occupational Safety and Health (OSH) Act of 1970, https://www.osha.gov/laws-regs/oshact/completeoshact. Accessed July 13, 2022.

State

Office of Planning and Research Guidelines for Noise Compatible Land Use

The State of California does not have standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established general plan guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in **Figure 4.10-2**, *Guideline for Noise Compatible Land Use*.[20] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land uses types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable."

In addition, California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with California Government Code Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

The State of California has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. They require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Regional

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

In Los Angeles County the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission (ALUC) and for coordinating the airport planning of public agencies within the county. The ALUC coordinates planning for the areas surrounding public use airports. The Comprehensive Land Use Plan provides for the orderly expansion of Los Angeles County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating the Comprehensive Land Use Plan, the Los Angeles County ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

[20] State of California Governor's Office of Planning and Research (OPR), General Plan Guidelines, 2003.

Land Use Compatibility for Exterior Community Noise

Land Use Category	Noise Range (Ldn or CNEL), dB			
	I	II	III	IV
Passively used open spaces	50	50-55	55-70	70+
Auditoriums, concert halls, amphitheaters	45-50	50-65	65-70	70+
ResidentialClow density single family, duplex, mobile homes	50-55	55-70	70-75	75+
ResidentialCmultifamily	50-60	60-70	70-75	75+
Transient lodgingCmotels, hotels	50-60	60-70	70-80	80+
Schools, libraries, churches, hospitals, nursing homes	50-60	60-70	70-80	80+
Actively used open spacesCplaygrounds, neighborhood parks	50-67	50-67	67-73	73+
Golf courses, riding stables, water recreation, cemeteries	50-70	50-67	70-80	80+
Office buildings, business commercial and professional	50-67	67-75	75+	75+
Industrial, manufacturing, utilities, agriculture	50-70	70-75	75+	75+

Noise Range I--Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Noise Range II--Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Noise Range III--Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Noise Range IV--Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Noise Control, California Department of Health 1976.

SOURCE: State of California Governor's Office of Planning and Research, General Plan Guidelines, 2003.

Crossings Campus

Figure 4.10-2
Guidelines for Noise Compatible Land Use

Local

City of Culver City

Culver City Municipal Code

Chapter 9.07 of the City of Culver City Municipal Code (CCMC) provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours. It is prohibited for any person to operate any radio, disc player or cassette player or similar device at a construction site in a manner that results in noise levels that are audible beyond the construction site property line.

Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. This section is applicable only to uses that would include regular and ongoing amplification, such as outdoor speakers used for a drive-through restaurant.

Culver City General Plan Noise Element

The City of Culver City Noise Standards are developed from those of several federal and State agencies including the Federal Highway Administration (FHWA), the USEPA, the Department of Housing and Urban Development, the American National Standards Institute, and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table 4.10-3**, *City of Culver City Exterior Noise Standards*, lists exterior noise level standards and the type of occupancy to which they should be applied. As with the California Noise Standards described above, these General Plan standards are related to the siting of land uses and are not typically used as thresholds of significance for determining noise impacts associated with construction and operation of the Project. However, the standards do provide a means for judging whether an existing noise environment would be compatible with development of a new noise-sensitive land use or whether a new use would create an incompatible noise environment for existing noise-sensitive uses.

TABLE 4.10-3
CITY OF CULVER CITY EXTERIOR NOISE STANDARDS

Zone	dBA CNEL
Residential	65
Commercial[a]	65

[a] This applies to Hotel, Motel, Transient Lodging, and not to other commercial uses such as retail.

SOURCE: City of Culver City, General Plan, Noise Element, 1996.

In addition, City of Culver City General Plan Noise Element (City of Culver City, approved by City Council July 22, 1996) discusses Regulation of Stationary Noise Sources, and stated that typical noise ordinance levels and durations, as listed below:

Daytime Levels (7:00 a.m. – 10:00 p.m.)	Nighttime Levels (10:00 p.m. – 7:00 a.m.)	Duration
55 dBA Leq	50 dBA Leq	30 minutes
60 dBA Leq	55 dBA Leq	15 minutes
65 dBA Leq	60 dBA Leq	5 minutes
70 dBA Leq	65 dBA Leq	1 minutes
75 dBA Leq	70 dBA Leq	Never

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

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

b. Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.

c. Noise abatement and acoustical design criteria for construction and operation of any new development.

City of Los Angeles

Los Angeles Municipal Code

The City of Los Angeles Noise Regulations are provided in Chapter XI of the Los Angeles Municipal Code (LAMC). LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation. This standard applies to radios, television sets, air conditioning, refrigeration, heating, pumping and filtering equipment, powered equipment intended for repetitive use in residential areas, and motor vehicles driven on-site. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provide a 5 dBA allowance for a noise source that causes noise lasting more than 5 but less than 15 minutes in any one-hour period, and an additional 5 dBA allowance (for a total of 10 dBA) for a noise source that causes noise lasting 5 minutes or less in any one-hour period.[21]

The LAMC provides that in cases where the actual ambient conditions are not known, the City's presumed daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels as defined in LAMC Section 111.03 should be used. The presumed ambient noise levels for these areas where the actual ambient conditions are not known as set forth in the LAMC Sections 111.03 are provided in **Table 4.10-4,** *City of Los Angeles Presumed Ambient Noise*

[21] City of Los Angeles, Municipal Code, Chapter XI, Article I, Section 111.02-(b), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193819. Accessed July 13, 2022.

Levels. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime.

TABLE 4.10-4
CITY OF LOS ANGELES PRESUMED AMBIENT NOISE LEVELS

Zone	Daytime Hours (7 a.m. to 10 p.m.) dBA (L_{eq})	Nighttime Hours (10 p.m. to 7 a.m.) dBA (L_{eq})
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1 and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

SOURCE: LAMC, Section 111.03.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dB.

LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard shall not apply where compliance therewith is technically infeasible.[22] LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. and 6:00 p.m.). In general, the City's Department of Building and Safety enforces Noise Ordinance provisions relative to equipment, and the Los Angeles Police Department (LAPD) enforces provisions relative to noise generated by people.

LAMC Section 113.01 prohibits collecting or disposing of rubbish or garbage, operating any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in LAMC Section 66.00, within 200 feet of any residential building between the hours of 9:00 p.m. and 6:00 a.m. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners.

LAMC Section 115.02 prohibits to installed, use, or operate with the City a loudspeaker or sound amplifying equipment in a fixed or moveable position or mounted upon any truck for the purposes of giving instructions, directions, talks, addresses, lectures, or transmitting music to any persons or

[22] In accordance with the City's Noise Ordinances, "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

assemblages of persons in or upon any public streets, alley, sidewalk, park or place, or other public property except when installed in compliance with the LAMC.

Section 91.1207.14.2 prohibits interior noise levels attributable to exterior sources from exceeding 45 dBA in any habitable room. The noise metric shall be either the day-night average sound level (L_{dn}) or the CNEL, consistent with the noise element of the local general plan.

Los Angeles General Plan Noise Element

The Noise Element of the City's General Plan policies include the CNEL guidelines for land use compatibility as shown in **Table 4.10-5**, *City of Los Angeles Land Use Compatibility for Community Noise*, and includes a number of goals, objectives, and policies for land use planning purposes.

TABLE 4.10-5
CITY OF LOS ANGELES LAND USE COMPATIBILITY FOR COMMUNITY NOISE

	Community Noise Exposure CNEL (dBA)			
Land Use	**Normally Acceptable**	**Conditionally Acceptable**	**Normally Unacceptable**	**Clearly Unacceptable**
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 75	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 75	70 to 80	Above 80
Transient Lodging – Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

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

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

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

Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, 2006.

The overall purpose of the Noise Element of the General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of people to excessive noise levels.[23] The following policies and objectives from the Noise Element of the General Plan are applicable to the Project:

Objective 2 (Non-airport): Reduce or eliminate non-airport related intrusive noise, especially relative to noise-sensitive uses.

Policy 2.2: Enforce and/or implement applicable City, State, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Exhibit I of the Noise Element also contains guidelines for noise compatible land uses.[24] Table 4.10-5 above summarizes these guidelines, which are based on OPR guidelines from 1990.

Existing Conditions

Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are generally more sensitive to noise than commercial and industrial land uses. Existing noise sensitive uses within 500 feet of the Project Site include the following:

- North (R1, Residential): Existing residential uses located in the City of Los Angeles approximately 250 feet to the north of the Project Site and north of Venice Boulevard.
- West (R2, Residential): Existing residential uses located in the City of Culver City approximately 100 feet to the west of the Project Site and west of National Boulevard.
- South (R3, Residential): Existing residential uses located in the City of Culver City approximately 120 feet to the south of the Project Site and south of Washington Boulevard, east of National Boulevard.
- East (R4, Residential): Existing residential uses located in the City of Culver City approximately 370 feet to the east of the Project Site and south of Washington Boulevard, west of Helms Avenue.

All other noise-sensitive uses are located at greater distances from the Project Site (i.e., greater than 500 feet away) and would experience lower noise levels associated with the Project. Therefore, additional sensitive receptors beyond those identified above are not evaluated.

[23] City of Los Angeles, Noise Element of the Los Angeles City General Plan, adopted February 3, 1999, pp. 1.1-2.4.
[24] City of Los Angeles. Noise Element of the Los Angeles City General Plan, p. I-1.

Ambient Noise Levels

The existing noise environment at the Project Site consists primarily of vehicle traffic including trucks, buses, etc. on National Boulevard, Venice Boulevard, Washington Boulevard, and side streets around the Project Site. Secondary noise sources include nearby commercial and residential activities. To quantify the existing noise environment, short-term (15-minute) measurements were conducted at four locations, identified as R1 through R4 in **Figure 4.10-3**, *Noise Measurement Locations*. A 15-minute measurement is a reasonable duration for sampling ambient noise levels where street traffic is the dominant source, as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted on Wednesday, January 19, 2022 (daytime hours between 10:00 a.m. and 11:30 a.m.) and May 24, 2022 (evening and nighttime hours between 8:00 p.m. and 10:00 p.m.), to characterize the existing noise environment in the Project vicinity.[25]

- Measurement Location R1 represents the noise environment of the residential uses to the north of the Project Site.
- Measurement Location R2 represents the noise environment of the residential uses to the west of the Project Site.
- Measurement Location R3 represents the noise environment of the residential uses to the south of the Project Site.
- Measurement Location R4 represents the noise environment of the residential uses to the east of the Project Site.

Noise measurements were conducted using Larson-Davis LxT1 Sound Level Meters (SLM). The Larson-Davis LxT1 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The recording microphones were placed at a height of 5 feet above the local grade elevation. The sound level meters were setup to collect the short-term, 15-minute average noise level (L_{eq}), as well as the maximum (Lmax) and minimum (Lmin) noise levels during the measurement period.

The noise analysis herein determines significance based on the Project's potential to generate temporary or long-term noise levels that would exceed or increase noise above existing ambient conditions. Therefore, ambient noise levels that were measured capturing the lower of either daytime or evening hours ambient conditions provide a conservative analysis, as use of these lower ambient noise levels reflect a greater incremental increase by Project-related contribution in noise over baseline ambient conditions with the Project than would occur if baseline noise levels reflected higher ambient noise conditions at the same location.

The results of the ambient sound measurements are summarized in **Table 4.10-7**, *Summary of Ambient Noise Measurements*. As shown therein, the measured daytime ambient noise levels ranged from 62.6 dBA L_{eq} at R1 to 68.3 dBA L_{eq} at R4, and the evening/nighttime ambient noise levels ranged from 59.6 dBA L_{eq} at R4 to 67.6 dBA L_{eq} at R2.

[25] Ambient noise levels in the Project area are primarily influenced by traffic. As the AM peak is generally 7:00 a.m. to 9:00 a.m., ambient noise levels would be expected to be lower between 10:00 a.m. and 11:30 when the daytime measurements were taken. As the noise impact analysis considers noise level increases over ambient levels, the noise measurements are likely conservative as utilized in the noise impact analysis within this EIR section.

SOURCE: Nearmap, 2021

Crossings Campus

Figure 4.10-3
Noise Measurement Locations

ESA

TABLE 4.10-7
SUMMARY OF AMBIENT NOISE MEASUREMENTS

	Measured Ambient Noise Levels (dBA)[a]					
	Daytime			Evening		
Location and Existing Land Uses	Leq	Lmax	Lmin	Leq	Lmax	Lmin
R1, Residential uses north of Project Site	62.6	73.0	49.9	65.8	90.7	51.3
R2, Residential uses west of Project Site	67.0	77.5	53.4	67.6	90.8	53.6
R3, Residential use south of Project Site	66.4	78.4	51.5	64.0	77.4	50.6
R4, Residential use east of Project Site	68.3	81.6	51.0	59.6	70.5	47.3

[a] Detailed measured noise data is included in Appendix K of this Draft EIR.

SOURCE: ESA, 2022.

Existing Roadway Noise Levels

To further characterize the Project area's ambient noise environment, CNEL noise levels attributed to existing traffic on local roadways were calculated using a traffic noise prediction model, which was developed based on calculation methodologies provided in the FHWA Traffic Noise Model (TNM) Technical Manual,[26] and traffic data provided in the Project's Transportation Impact Study[27] (refer to Appendix M of this Draft EIR). The TNM model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions.

Existing roadway noise levels were calculated for 59 roadway segments located in the vicinity of the Project Site. The roadway segments selected for analysis are those expected to be most directly impacted by Project-related traffic, which, for the purpose of this analysis, include the roadways located near and immediately adjacent to the Project Site. These roadways, when compared to roadways located further away from the Project Site, would experience the greatest percentage increase or largest increase in volume from traffic generated by the Project (as distances are increased from the Project Site, traffic is spread out over a greater geographic area and its effects are reduced).

The ambient noise environment in the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. As indicated in **Table 4.10-8**, *Predicted Existing Vehicular Traffic Noise Levels*, the calculated CNEL (30 feet from the roadway centerline) from actual existing traffic volumes on the analyzed roadway segments ranged from 55.1 dBA to 75.0 dBA.

[26] The traffic noise model which was developed based on calculation methodologies provided in the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol document and traffic data provided in the Project's Transportation Impact Study provided in Appendix M of this Draft EIR. This methodology, considered an industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

[27] Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022. Provided in Appendix M of this Draft EIR.

TABLE 4.10-8
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA)[a]
Cattaraugus Avenue		
North of Venice Blvd	Commercial/Residential	63.8
South of Venice Blvd	Commercial/Residential	63.8
Fairfax Avenue		
North of Washington Blvd	Commercial/Industrial	69.8
South of Washington Blvd	Commercial/Industrial	71.3
Helms Avenue		
Between Venice Blvd and Washington Blvd	Residential	59.2
North of Venice Blvd	Residential	59.8
South of Washington Blvd	Residential	56.9
Hutchinson Avenue		
Between Venice Blvd and Washington Blvd	Residential	57.3
I-10 Westbound Offramp/Cadillac Avenue		
North of Venice Blvd	Commercial/Residential	70.3
South of Venice Blvd	Commercial/Residential	71.8
I-10 Westbound Offramp/Electric Drive		
North of Washington Blvd	Residential/Commercial	68.3
South of Washington Blvd	Residential/Commercial	69.8
I-10 Westbound Offramp/Kincardine Avenue		
East of Robertson Blvd	Commercial/Residential	66.3
West of Robertson Blvd	Residential	61.7
La Cienega Avenue/McManus Avenue		
South of Washington Blvd	Commercial/Industrial/Residential	60.0
La Cienega Boulevard		
Between Venice Blvd and Washington Blvd	Commercial/Industrial/Residential	67.3
North of Venice Blvd	Commercial/Industrial/Residential	70.8
Landmark Street		
South of Washington Blvd	Residential	61.2
National Boulevard		
Between Ivy Station Driveway and Washington Blvd	Industrial/Residential/Commercial	69.5
Between Venice Blvd and Ivy Station Driveway	Industrial/Residential/Commercial	69.5
North of Venice Blvd	Industrial/Residential/Commercial	68.3
South of Washington Blvd	Industrial/Residential/Commercial	69.3
S Robertson Boulevard		
Between Venice Blvd and Washington Blvd	Commercial/Residential	67.0
North of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.8
North of Venice Blvd	Commercial/Residential	72.1

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA)[a]
South of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.3
S Robertson Boulevard/Higuera Street		
South of Washington Blvd	Commercial/Residential	68.5
Venice Boulevard		
Between Cattaraugus Ave and La Cienega Blvd	Commercial/Residential	71.6
Between Helms Ave and Cattaraugus Ave	Commercial/Residential	71.4
Between La Cienega Blvd and I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.5
Between National Blvd and Helms Ave	Commercial/Residential	71.6
Between S Robertson Blvd and National Blvd	Commercial/Residential	72.0
East of I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.3
West of S Robertson Blvd	Commercial/Residential	72.1
Washington Boulevard		
Between Fairfax Ave and I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	70.0
Between Helms Ave and La Cienega Ave/McManus Ave	Commercial/Residential	67.1
Between Ince Ave/Washington Blvd and S Robertson Blvd/Higuera St	Commercial/Residential	63.1
Between La Cienega Ave/McManus Ave and Fairfax Ave	Commercial/Residential	67.5
Between Landmark St and National Blvd	Commercial/Residential	66.9
Between National Blvd and Wesley St	Commercial/Residential	67.7
Between S Robertson Blvd/Higuera St and Landmark St	Commercial/Residential	67.3
Between Wesley St and Helms Ave	Commercial/Residential	67.0
East of I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	69.5
Wesley Street		
South of Washington Blvd	Residential	55.8

[a] Calculated based on existing traffic volumes provided by Fehr & Peers, July 2022. Values are rounded to the nearest tenth decimal place. The distance from roadside receiver traffic noise level to roadway centerline was estimated using Web-based satellite imaging for each roadway segment analyzed.

SOURCE: ESA, 2022.

Vibration-Sensitive Receptor Locations

Typically, groundborne vibration generated by man-made activities (i.e., rail and roadway traffic, operation of mechanical equipment, and typical construction equipment) diminishes rapidly with distance from the vibration source. Construction activities, such as impact pile driving, would have the greatest effect on vibration sensitive land uses in the Project vicinity. Energy is lost during the transfer of energy from one particle to another and as a result, vibration becomes less perceptible with increasing distance from the source. Therefore, with respect to potential structural damage, structures in close proximity (adjacent) to the Project Site are considered more vibration sensitive.

Structures located nearest to the Project Site that are considered sensitive receptors with regard to structural damage from vibration include residential uses to the west and south. Commercial buildings are also located adjacent to the Project Site to the east. Helms Bakery Building to the east of the Project Site is a historic building, located approximately 20 feet from the Project Site boundary.

With respect to human annoyance, sensitive land uses include buildings where vibration-sensitive equipment is used (e.g., hospitals, research, and manufacturing), as well as residential land uses and buildings where people normally sleep, and land uses where a quiet environment is an important aspect of operation, such as schools and churches. Generally, industrial or commercial (including office) uses are not considered vibration-sensitive.[28] Sensitive receptors potentially subject to human annoyance due to vibration in the Project vicinity include the residential uses to the north, west, south, and east (R1, R2, R3, and R4, respectively, as shown in Figure 4.10-3).

In contrast to noise impact analysis, the existing ambient vibration is not required to assess vibration impact in most cases. Except for rare situations, existing environmental vibration is usually below human perception. Potential sources of vibration in the Project area include vehicular traffic on Washington Boulevard, National Boulevard, Venice Boulevard, and commercial activity in the Project vicinity.

4.10.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to noise and vibration if it would result in the:

- **NOI-1:** Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- **NOI-2:** Generation of excessive groundborne vibration or groundborne noise levels; or
- **NOI-3:** 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.

Based on the regulatory framework described above, significant impacts would occur if any of the following criteria are met:

- Noise Criteria (NC)-1: Without City approval for extended construction hours, Project construction activities within the Los Aneles Parcel would not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday, and within the Culver City Parcel between the hours of 8:00 p.m. and 8:00 a.m. Mondays through Fridays; 7:00 p.m. and 9:00 a.m. Saturdays; 7:00 p.m. and 10:00 a.m. Sundays. Construction occurring within these non-permitted hours would cause a significant noise impact without City approval. That is, should extended construction hours

[28] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Table 6-1.

(7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) be granted by the City of Los Angeles and/or Culver City via their respective approval processes, a determination of construction noise impacts occurring during those approved extended hours would be subject to the construction-related noise criteria below, as applicable.

- NC-2: Project construction activities would not incorporate noise reduction techniques as specified in the City of Culver City's General Plan Policy 2.A of the Noise Element.
- NC-3: Project construction activities would result in noise levels 5 dBA L_{eq} greater than measured ambient noise levels (see Table 4.10-1) at noise-sensitive receptors.
- NC-4: The Project-related off-site construction traffic would cause ambient noise levels to increase by 5 dBA L_{eq} or more at a noise sensitive receiver adjacent to the Project Site.
- NC-5: The Project-related on-site operations would cause ambient noise levels to increase by 5 dBA L_{eq} or more at a noise sensitive receiver adjacent to the Project Site.
- NC-6: The Project-related operation of the loading dock, or refuse collection area exceeds the average ambient noise level by 5 dBA.
- NC-7: Off-site traffic from the Project operation causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category.
- NC-8: Off-site traffic from the Project operations cause the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater within the "normally acceptable" or "conditionally acceptable" category.
- NC-9: Potential Building Damage – Project construction activities cause groundborne vibration levels to exceed 0.2 inch-per-second PPV at the nearest residential and school buildings or exceed 0.12 inch-per-second PPV at buildings extremely susceptible to vibration damage such as historic buildings.
- NC-10: Potential Human Annoyance – Project construction activities cause groundborne vibration levels to exceed 72 VdB for infrequent events, at nearby residential uses.

Methodology

The methodology for evaluating construction and operational noise and vibration is discussed below and the calculation assumptions and results are also provided in Appendix K of this Draft EIR.

On-Site Construction Noise

On-site construction noise impacts were evaluated by determining the noise levels generated by the different types of construction activity anticipated, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise) at those receptors. The types of construction equipment used, construction phasing, and construction schedule were provided by the Project's construction representative. While construction of the Project would not use impact pile driving, vibratory pile and drill installation equipment would be used during construction.

Construction of the Project would be continuous and with overlapping phases. For the purposes of the noise analysis in this Draft EIR, the construction schedule for Building 1 and Building 2 were

separated assuming Building 1 begins in the first quarter of 2023 and is completed in the fourth quarter of 2024 and Building 2 begins in the third quarter of 2023 and ends in the fourth quarter of 2025. The first full Project operational buildout year would be in 2026.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which all pieces of construction equipment would operate simultaneously with the two loudest types of equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. The remaining equipment was assumed to be spread out over the entire Project Site. The most likely construction activity that could extend to the evening hours is the concrete finishing activity, which could occur until 10:00 p.m. Finishing is completed with hand tools or an electric-powered rotor (i.e., a tool that functions similar to a floor polisher, but for concrete smoothing). However, it is acknowledged that other phases of construction could extend into the later evening hours intermittently. Accordingly, the analysis conservatively accounts for this potential intermittent construction activity. The ambient noise measurements were taken during the COVID-19 pandemic, which resulted in the ambient noise levels capturing lower pandemic-era traffic conditions to provide a conservative analysis, as use of these lower traffic noise levels would result in a greater incremental increase in noise over baseline ambient conditions with the Project than would occur if baseline noise levels reflected higher pre-pandemic traffic conditions. The following steps were undertaken to assess construction-period noise impacts.

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.10-7);
2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration Roadway Construction Noise Model (RCNM);
3. Distances between construction site locations (noise sources) and surrounding sensitive receptors were measured using Project architectural drawings and site plans and Web-based electronic map;
4. Construction is split into two phases. B1 refers to Phase 1 where Building 1 will be constructed. B2 refers to Phase 2 where Building 2 will be constructed.
5. The construction noise level was then calculated, in terms of hourly L_{eq}, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and
6. Construction noise levels were then compared to the construction noise significance thresholds identified below.

Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts have been evaluated using the Caltrans Technical Noise Supplement (TeNS) method based on the roadway traffic volume data provided in the Transportation Impact Study prepared for the Project and included in Appendix M of this Draft EIR. This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to Project development was calculated and combined with the baseline without Project noise levels and then compared to baseline noise levels that would occur under the "Without Project" condition.

Stationary Point-Source Noise (Operations)

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as rooftop mechanical equipment, parking structure, and loading area activity, calculating the hourly L_{eq} noise level from each noise source (incorporating individual usage factor for each equipment) at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.10-7);
2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using Project architectural drawings, Web-based electronic map, and site plans;
3. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
4. Noise level increases were compared to the stationary source noise significance thresholds identified below; and
5. For outdoor mechanical equipment, the maximum allowable noise emissions from any and all outdoor mechanical equipment were specified such that noise levels would not exceed the significance threshold identified below.

For any outdoor speaker proposed on the Project Site, Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. Outdoor speaker noise would be evaluated and comply with the regulatory requirement.

The Project's loading docks would be located on the east and south sides of the Project, via a proposed alley between the Project Site and the buildings to the east and an existing alley between the Project Site and the buildings to the south, and both would be inside the parking garages and enclosed by the buildings to the off-site receptors. Proposed on-site garages would be operated from 7:00 a.m. to 8:00 p.m. with the garage being secured afterhours but accessible with a key fob. Noise associated with trucks maneuvering into the loading dock area, although it would be fully screened by Project building and the existing buildings to the east and south, would be evaluated and compared to the ambient-based noise threshold. Based on a noise survey that was conducted at loading dock and trash collection facilities by ESA, loading dock activity (namely idling semi-trucks and backup alarm beeps) could generate noise levels of approximately 70 dBA L_{eq} at a reference distance of 50 feet.[29]

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

Groundborne Vibration (Construction and Operations)

Groundborne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the Project's activities to the applicable vibration significance thresholds. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.[30] The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. While construction of the Project would not use impact pile driving, vibratory pile and drill installation equipment would be used during construction. The most likely construction activity that could extend to the evening hours is the finishing activity, which could occur until 10:00 p.m. Finishing is completed with hand tools or an electric-powered rotor (e.g., a floor polisher for concrete). However, it is acknowledged that other phases of construction could extend into the later evening hours intermittently. Accordingly, the analysis conservatively accounts for this potential intermittent construction activity.

Vibration associated with operation of the proposed uses were evaluated based on the outdoor activity and equipment use.

Project Design Features

The following project design features have been accounted for their potential noise reduction in the impact analysis:

> **NOI-PDF-1: Project Construction Schedule**. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to abutting property owners and occupants. Evidence of such notification will be provided to the appropriate department of City of Culver City and City of Los Angeles . The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).
>
> **NOI-PDF-2: Use of Impact Pile Driver.** The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating vibratory pile drivers and drills will be used.
>
> **NOI-PDF-3: Construction Rules Sign**. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified for such incidences., These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of both cities.

[30] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Table 7-4.

NOI-PDF-4: Compliance with Noise Element. The following noise standards from Policy 2.A of the City of Culver City's General Plan Noise Element will be complied with at all times:

a) No construction equipment will be operated without an exhaust muffler, and all such equipment will have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original manufacturer supplied equipment;

b) All construction equipment will be properly maintained to minimize noise emissions;

c) If any construction vehicles are serviced at an on-site location, the vehicle(s) will be setback from any street and other property lines so as to maintain a distance of at least 100 feet from the public right-of-way and from Noise Sensitive Receptors;

d) Noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) will be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding as approved by the Planning Manager;

e) The Project will not allow any delivery truck idling for more than 5 minutes in the loading area. Signs will be posted prohibiting such idling.

NOI-PDF-5: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.

NOI-PDF-6: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources and City of Los Angeles Municipal Code Section 112.02 through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.

NOI-PDF-7: Loading Dock Operating Hours. On-site loading dock operating hours will be limited to 7:00 a.m. to 10:00 p.m.

NOI-PDF-8: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in the central courtyard such that the sound would be blocked by the proposed on-site building from off-site receivers. No amplified sound systems would be installed in the publicly accessible areas along the Project's street frontages. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. The systems will be designed so as not to result in a perceivable increase in noise beyond the Project Site. Specifically, daytime outdoor amplified sound systems will not result in an increase of 3 dBA L_{eq} over existing ambient noise conditions at the Project property line. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section 111.02, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an

adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction. All speakers will have a minimum setback of 25 feet from the Project property line and will be directed internally and acoustically shielded from off-site uses. Under the rare occasion of maximum crowd gathering in the central courtyard with temporary amplified sound systems, the combined sound level from speakers and people conversation shall not exceed the ambient noise level plus 5 dBA at an adjacent property line, which would limit the speaker sound level to a maximum of 90 dBA when measured at a distance of 50 feet from the speakers. A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City and City of Los Angeles that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.

Analysis of Project Impacts

Threshold NOI-1: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis

Construction

On-Site Construction Noise

Construction of the Project would require the use of heavy equipment during the various construction phases at the Project Site. During each stage of development, there would be a different mix of equipment. As such, construction activity noise levels at and near the Project Site would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Individual pieces of construction equipment anticipated during Project construction could produce maximum noise levels of 74 dBA to 89 dBA L_{max} at a reference distance of 50 feet from the noise source, as shown in **Table 4.10-9**, *Construction Equipment Noise Levels*. These maximum noise levels would occur when equipment is operating at full power. The estimated usage factor for the equipment is also shown in Table 4.10-9. The usage factors are based on FHWA's RCNM User's Guide.[31]

[31] Federal Highway Administration (FHWA), Roadway Construction Noise Model User's Guide, p. 3, 2006.

TABLE 4.10-9
CONSTRUCTION EQUIPMENT NOISE LEVELS

Construction Equipment	Estimated Usage Factor (%)	Noise Level at 50 Feet (dBA, Lmax)
Air Compressors	50	78
Bulldozer	40	82
Crane	40	81
Dozer	40	82
Excavator	40	81
Forklift	10	75
Grader	40	85
Jackhammers	20	89
Other Equipment	50	85
Pumps	50	81
Roller	25	80
Sweeper/Scrubbers	10	82
Tractor/Loader/Backhoe	25	80
Welders	40	74

SOURCE: FHWA, *Roadway Construction Noise Model User's Guide*, 2006.

During Project construction, the nearest and most affected off-site noise-sensitive receptors that would be exposed to increased noise levels are residential uses in the Project vicinity. Sensitive receptor locations correspond to ambient noise measurement locations shown on Figure 4.10-3. Specifically, the nearest off-site noise-sensitive receptor locations include the following:

- R1: Residences located north of the Project Site and north of Venice Boulevard, along Curts Avenue (City of Los Angeles).
- R2: Residences located west of the Project Site and west of National Boulevard (City of Culver City).
- R3: Residences located south of the Project Site and south of Washington Boulevard, east of National Boulevard (City of Culver City).
- R4: Residences located east of the Project Site and south of Washington Boulevard, west of Helms Avenue (City of Culver City).

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which all pieces of construction equipment would operate simultaneously with the two loudest types of equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. The remaining equipment was assumed to be located at the center of the Project Site. The estimated noise levels at the off-site sensitive receptors were calculated using equipment source noise levels identified in the FHWA's RCNM, and were based on a maximum concurrent operation of hand tools and equipment (e.g., pneumatic hand tools/air compressors, cranes, tractor/loader/backhoe,

forklift, generator sets, welders), which is considered a worst-case evaluation because the Project would typically use less overall equipment on a daily basis, and as such would generate lower noise levels. The Project's construction schedule would be provided to nearby property owners and occupants pursuant to Project Design Feature NOI-PDF-1, and evidence of such notification will be provided to appropriate department of City of Los Angeles and City of Culver City. Also, Project construction would not use impact pile drivers, but will instead use lower noise and vibration generating techniques such as incorporating vibratory pile drivers and drills in accordance with Project Design Feature NOI-PDF-2. In addition, during all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) in accordance with Project Design Feature NOI-PDF-3.In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified at the next available work day regarding such incidences. Construction noise levels were estimated including the assumption that there would be some construction phase overlap. **Table 4.10-10**, *Estimate of Construction Noise levels (L_{eq}) at Existing Off-Site Sensitive Receptor Locations,* shows the estimated construction noise levels that would occur at the nearest off-site sensitive uses during a peak day of construction activity at the Project Site. Construction noise has been estimated at each of the receptor locations shown in Figure 4.10-3 and not at each individual residential lot in the surrounding area. As the receptor locations are closer to the Project site than other residential receptors, noise levels at such other receptors would be less than at the receptor locations shown in Figure 4.10-3.

As shown in Table 4.10-10, construction noise levels are estimated to reach a maximum of 88.6 dBA L_{eq} at the nearest sensitive receptors (namely R2 within the City of Culver City limits) as well as exceed the lowest ambient noise-based threshold of 72.0 dBA. At R1, which is located within the City of Los Angeles, the maximum construction noise level would be 80.7 dBA L_{eq}, which would exceed the 75.0 dBA limit in the City of Los Angeles Noise Ordinance and would exceed the lowest ambient noise-based threshold of 67.6 dBA. Construction noise level projected at R3 (within the City of Culver City limits) would reach 82.0 dBA and exceed the ambient noise-based threshold of 69.0 dBA. Construction noise projected at R4 (within the City of Culver City limits) would reach 67.4 dBA and exceed the ambient noise-based threshold of 64.6 dBA.

As shown in Table 4.10-10, construction activities would result in temporary increases in ambient noise (greater than 5 dBA L_{eq} over ambient levels) at most of the studied sensitive receptors prior to implementation of measures to reduce the construction noise. Project construction would result in noise levels greater than 5 dBA L_{eq} over ambient levels during multiple phases of activity at R1, R2, R3 and R4. When construction activity extends to the evening or nighttime hours , the ambient-based threshold would be exceeded at off-site receiver locations. When daytime ambient noise levels are lower compared to the corresponding evening hours at the same location, the lower daytime ambient noise level is used as the threshold for significance determination.

TABLE 4.10-10
ESTIMATE OF CONSTRUCTION NOISE LEVELS (L_{EQ}) WITHOUT MITIGATION AT EXISTING OFF-SITE SENSITIVE RECEPTOR LOCATIONS

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
R1 (Residences north of Project Site)	B1 Demolition	250	71.6	62.6/65.8	67.6	Yes
	B1 Site Preparation		67.2			No
	B1 Grading/Excavation		80.2			Yes
	B1 Drainage/Utilities/Trenching		63.1			No
	B1 Foundations		66.5			No
	B1 Building Construction		66.4			No
	B1 Architectural Coating		67.4			No
	B1 Paving		69.2			Yes
	B2 Demolition		71.8			Yes
	B2 Site Preparation		67.5			No
	B2 Grading/Excavation		80.3			Yes
	B2 Drainage/Utilities/Trenching		58.8			No
	B2 Foundations		68.6			Yes
	B2 Building Construction		65.4			No
	B2 Architectural Coating		60.0			No
	B2 Paving		71.1			Yes
	Demolition (B1), Site Preparation (B1)		72.9			Yes
	Site Preparation (B1), Grading/Excavation (B1)		80.4			Yes
	Drainage/Utilities/Trenching (B1), Demolition (B2)		72.4			Yes
	Foundations/Concrete Pours (B1), Demolition (B2)		73.0			Yes
	Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2)		74.0			Yes
	Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2)		80.7			Yes

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2)		80.7			Yes
	Building Construction (B1), Grading/Excavation (B2)		80.5			Yes
	Building Construction (B1), Drainage/Utilities/Trenching (B2)		67.1			No
	Building Construction (B1), Foundations/Concrete Pours (B2)		70.7			Yes
	Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2)		72.3			Yes
	Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2)		74.1			Yes
	Foundations/Concrete Pours (B2), Building Construction (B2)		70.3			Yes
	Building Construction (B2), Architectural Coating (B2)		66.5			No
	Building Construction (B2), Architectural Coating (B2), Paving (B2)		72.4			Yes
	Maximum Overlapping Noise Level		**80.7**			**Yes**
R2 (Residences west of Project Site)	B1 Demolition	100	79.1	67.0/67.6	72.0	Yes
	B1 Site Preparation		76.3			Yes
	B1 Grading/Excavation		88.2			Yes
	B1 Drainage/Utilities/Trenching		75.9			Yes
	B1 Foundations		73.4			Yes
	B1 Building Construction		73.4			Yes
	B1 Architectural Coating		75.1			Yes
	B1 Paving		76.6			Yes
	B2 Demolition		79.2			Yes
	B2 Site Preparation		74.9			Yes
	B2 Grading/Excavation		88.3			Yes

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	B2 Drainage/Utilities/Trenching		63.7			No
	B2 Foundations		76.1			Yes
	B2 Building Construction		70.5			No
	B2 Architectural Coating		68.0			No
	B2 Paving		79.0			Yes
	Demolition (B1), Site Preparation (B1)		81.0			Yes
	Site Preparation (B1), Grading/Excavation (B1)		88.4			Yes
	Drainage/Utilities/Trenching (B1), Demolition (B2)		80.9			Yes
	Foundations/Concrete Pours (B1), Demolition (B2)		80.2			Yes
	Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2)		81.3			Yes
	Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2)		88.6			Yes
	Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2)		88.5			Yes
	Building Construction (B1), Grading/Excavation (B2)		88.4			Yes
	Building Construction (B1), Drainage/Utilities/Trenching (B2)		73.8			Yes
	Building Construction (B1), Foundations/Concrete Pours (B2)		78.0			Yes
	Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2)		79.8			Yes
	Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2)		81.5			Yes
	Foundations/Concrete Pours (B2), Building Construction (B2)		77.2			Yes
	Building Construction (B2), Architectural Coating (B2)		72.5			Yes

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	Building Construction (B2), Architectural Coating (B2), Paving (B2)		79.9			Yes
	Maximum Overlapping Noise Level		**88.6**			**Yes**
R3[a] (Residences south of Project Site, east of National Boulevard)	B1 Demolition	120	72.6	66.4/64.0	69.0	Yes
	B1 Site Preparation		69.8			Yes
	B1 Grading/Excavation		81.6			Yes
	B1 Drainage/Utilities/Trenching		69.5			Yes
	B1 Foundations		67.0			No
	B1 Building Construction		66.9			No
	B1 Architectural Coating		68.5			No
	B1 Paving		70.1			Yes
	B2 Demolition		72.7			Yes
	B2 Site Preparation		68.4			No
	B2 Grading/Excavation		81.7			Yes
	B2 Drainage/Utilities/Trenching		57.8			No
	B2 Foundations		69.6			Yes
	B2 Building Construction		64.5			No
	B2 Architectural Coating		61.4			No
	B2 Paving		72.4			Yes
	Demolition (B1), Site Preparation (B1)		74.4			Yes
	Site Preparation (B1), Grading/Excavation (B1)		81.9			Yes
	Drainage/Utilities/Trenching (B1), Demolition (B2)		74.4			Yes
	Foundations/Concrete Pours (B1), Demolition (B2)		73.7			Yes
	Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2)		74.9			Yes
	Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2)		82.0			Yes

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2)		82.0			Yes
	Building Construction (B1), Grading/Excavation (B2)		81.8			Yes
	Building Construction (B1), Drainage/Utilities/Trenching (B2)		67.4			No
	Building Construction (B1), Foundations/Concrete Pours (B2)		71.5			Yes
	Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2)		73.3			Yes
	Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2)		75.0			Yes
	Foundations/Concrete Pours (B2), Building Construction (B2)		70.8			Yes
	Building Construction (B2), Architectural Coating (B2)		66.2			No
	Building Construction (B2), Architectural Coating (B2), Paving (B2)		73.4			Yes
	Maximum Overlapping Noise Level		**82.0**			**Yes**
R4[b] (Residences east of Project Site, west of Helms Avenue)	B1 Demolition	370	58.6	68.3/59.6	64.6	No
	B1 Site Preparation		55.6			No
	B1 Grading/Excavation		66.8			Yes
	B1 Drainage/Utilities/Trenching		56.5			No
	B1 Foundations		54.3			No
	B1 Building Construction		54.2			No
	B1 Architectural Coating		54.5			No
	B1 Paving		56.3			No
	B2 Demolition		59.0			No
	B2 Site Preparation		54.7			No
	B2 Grading/Excavation		66.9			Yes

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	B2 Drainage/Utilities/Trenching		47.9			No
	B2 Foundations		55.6			No
	B2 Building Construction		54.2			No
	B2 Architectural Coating		46.6			No
	B2 Paving		57.7			No
	Demolition (B1), Site Preparation (B1)		60.4			No
	Site Preparation (B1), Grading/Excavation (B1)		67.2			Yes
	Drainage/Utilities/Trenching (B1), Demolition (B2)		60.9			No
	Foundations/Concrete Pours (B1), Demolition (B2)		60.3			No
	Foundations/Concrete Pours (B1), Demolition (B2), Site Preparation (B2)		61.3			No
	Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2)		67.4			Yes
	Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2)		67.4			Yes
	Building Construction (B1), Grading/Excavation (B2)		67.2			Yes
	Building Construction (B1), Drainage/Utilities/Trenching (B2)		55.1			No
	Building Construction (B1), Foundations/Concrete Pours (B2)		58.0			No
	Building Construction (B1), Architectural Coating (B1), Foundations/Concrete Pours (B2)		59.6			No
	Building Construction (B1), Architectural Coating (B1), Paving (B1), Foundations/Concrete Pours (B2)		61.3			No
	Foundations/Concrete Pours (B2), Building Construction (B2)		58.0			No
	Building Construction (B2), Architectural Coating (B2)		54.9			No

Off-Site Sensitive Land Uses	Construction Phase	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L_{eq})	Ambient Noise Levels (Day/Evening)	Lowest Threshold	Exceed Threshold?
	Building Construction (B2), Architectural Coating (B2), Paving (B2)		59.6			No
	Maximum Overlapping Noise Level		**67.4**			Yes

NOTES:

B1= Building 1 B2 = Building 2

[a] R3 is mostly shielded by the existing building to the south of the Project Site, and would receive a minimum 5 dBA noise reduction. These are accounted for in the calculations.

[b] R4 is located behind a building that provides full shielding effect and a minimum of 10 dBA noise reduction. These are accounted for in the calculations.

[c] Although construction of the Project would be continuous and overlapping for the two buildings, to more accurately assess the noise levels. from each of the subphases, which would be temporally separated, the construction schedules were separated into two phases. B1 refers to Phase 1 where Building 1 will be constructed. B2 refers to Phase 2 where Building 2 will be constructed.

SOURCE: ESA, 2022.

Based on the results of the analysis, it can be assumed that ambient noise at certain residential uses to the north, west, and south would be significantly impacted by Project construction. The level of impact at each residential area would vary due to varying distances to Project construction and the presence of intervening structures such as existing buildings.

As indicated above, LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. In the event construction occurs outside of the permitted hours without approval from the respective jurisdiction, as applicable, a significant impact would occur. However, it is anticipated that the Project would seek approval from the respective jurisdiction, as applicable, to initiate construction as early as 7:00 a.m. and end as late as 10:00 p.m. During these extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) noise levels could still nonetheless exceed the thresholds as shown in Table 4.10-10, and for this reason, would be considered potentially significant impacts.

As Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance (see NC-1, NC-2, and NC-3 in Thresholds of Significance) at all studied receptors, construction noise impacts would be potentially significant, and mitigation measures would be required.

Off-Site Construction Noise

Worker Trips. Construction of the Proposed Project would generate daily worker trips to and from the Project Site, as well as haul trucks and concrete trucks to transport construction materials. A maximum number of worker trips is estimated to be 370 trips during the overlap period of B2 Foundations and Building Construction phases. As a worst-case scenario, it is assumed that all worker trips would arrive at the Project Site between 6:00 a.m. and 7:00 a.m. and leave the Project Site either between 3:00 p.m. and 4:00 p.m. or between 9:00 p.m. and 10:00 p.m. It is also conservatively assumed that all worker trips would travel on at least one of the five arterials leading to the Project Site Under Existing Conditions, each of these five arterials carries the following peak hour traffic volumes:

- La Cienega Boulevard: 1,030 to 2,991
- National Boulevard: 975 to 1,845
- Venice Boulevard: 2,733 to 3,509
- Washington Boulevard: 1,056 to 2,198 (except along Washington Boulevard between Ince Avenue/Washington Boulevard and S. Robertson Boulevard/Higuera Street, where the peak hour traffic volumes range from 304 to 500).
- S. Robertson Boulevard: 1,509 to 3,013 (except along S Robertson Boulevard between Venice Boulevard and Washington Boulevard, where peak hour traffic volumes range from 880 to 983,

and along S. Robertson Boulevard /Higuera Street south of Washington Boulevard, where peak hour traffic volumes range from 623 to 652.

Traffic noise levels would increase by 3 dBA when the traffic volumes double. For example, everything else (vehicle speed, roadway width, vehicle distribution, etc.) remain the same, when traffic volume increases from 1,000 to 2,000, traffic noise level experienced at a receiver along the road would increase by 3 dBA.

Because the estimated maximum peak hour worker trips would be 370 and this volume is only a small percentage of the peak hour volumes along the five arterials leading to the Project Site, it would contribute to less than 1 dBA increase to the existing traffic noise levels along these five arterials. Similarly, along S. Robertson Boulevard, the maximum peak hour worker trips of 370 would be less than the 623 to 983 peak hour traffic volumes along S. Robertson Boulevard between Venice Boulevard and Washington Boulevard and along S. Robertson Boulevard/Higuera Street south of Washington Boulevard. Therefore, there would be a less than 3 dBA increase in traffic noise level over the existing condition along these two segments of S. Robertson Boulevard, where noise-sensitive uses (e.g., residential uses) are located within a "normally acceptable" or "conditionally acceptable" category. This increase would be less than the significance threshold of an increase of 5 dBA Leq for construction noise. Impacts would be less than significant, and no mitigation is required.

Along Washington Boulevard between Ince Avenue/Washington Boulevard and S. Robertson Boulevard/Higuera Street, the projected maximum peak hour worker trips of 370 would be greater than the lowest peak hour traffic volume of 304 along this roadway segment. The increase in peak hour traffic noise level would be 3.4 dBA, and the resulting traffic noise level would remain low along this segment of the road, where noise-sensitive uses (e.g., residential uses) are located within a "normally acceptable" or "conditionally acceptable" category. This increase would be less than the significance threshold of an increase of 5 dBA Leq for construction noise. Impacts would be less than significant, and no mitigation is required.

This analysis is conservative as it is highly unlikely that all workers would travel to the site along the same arterial streets, and workers will be travelling to and from locations around the region. Therefore, actual noise levels from construction worker traffic would lower as such traffic would be dispersed and less on any individual street.

Construction Trucks. Construction truck trips would occur throughout the construction period and would be associated with hauling material and excavated soil from the Project Site and delivering concrete and building materials to the Project Site. This analysis assumes that haul truck and vendor truck trips would be evenly distributed over a 6-hour work period and concrete trucks trips would be evenly distributed over a 9-hour work period, including on Saturdays. Construction of the Project's two buildings would occur in two phases, B1 and B2. The overlapping construction of B1 and B2 would result in overlapping haul truck, vendor truck, and concrete truck trips. The maximum number of truck trips in a day would occur during the following overlapping activities: B1 foundation/concrete pours (204 concrete truck trips in a day, which includes inbound and outbound trips), B1 building construction vendor trucks (56 vendor truck trips in a day, which includes inbound and outbound trips), and B2 grading/excavation haul trucks (178 haul truck trips

in a day, which includes inbound and outbound trips). These overlapping activities would result in 438 truck trips in a day, accounting for inbound and outbound trips. Based on a 6-hour work period for haul and vendor trucks and a 9-hour work period for concrete trucks, the maximum hourly truck trips from these overlapping activities would be result in 23 concrete truck trips per hour, 10 vendor truck trips per hour, and 30 haul truck trips per hour, for a maximum total of 63 truck trips per hour, accounting for inbound and outbound trips. For the purposes of this noise analysis, the trucks were modeled as heavy-duty trucks.

Haul Trucks

Construction haul trucks for demolition material and soil hauling would generate haul truck travel between the Project Site and the Azusa Land Reclamation Landfill, or one of a number of inert debris engineered fill operations that are located throughout the County. Note that any contaminated soil that is found during excavation is assumed to be diverted to the nearest available landfill that accepts such soil. Incoming/outgoing haul trucks would travel to and from the Project Site using the following route(s). The percentage of trucks utilizing each of the routes is not known. Therefore, each haul route is analyzed for construction truck traffic noise impacts assuming each route would have the maximum hourly haul truck trips along the modeled roadway segments.

Haul trucks would arrive at the Project Site via the following routes:

- I-10 to Venice Boulevard to National Boulevard to the Project Site;
- I-10 to Venice Boulevard to National Boulevard to Washington Boulevard to the Project Site;
- I-10 to La Cienega Boulevard to Washington Boulevard to the Project Site; and/or
- I-10 to Washington Boulevard to the Project Site.

Haul trucks would leave the Project Site via the following routes:

- Project Site to Venice Boulevard to La Cienega Boulevard to I-10;
- Project Site to Venice Boulevard to National Boulevard to I-10;
- Project Site to Venice Boulevard to S. Robertson Boulevard to I-10;
- Project Site to Venice Boulevard to I-10; and/or
- Project Site to Washington Boulevard to National Boulevard to I-10.

Foundations Concrete Pour and Vendor Trucks

Because concrete trucks and vendor trucks would come from a variety of locations, it would be speculative to assume which roadways would be traveled by concrete trucks and vendor trucks. Therefore, noise associated with all peak hour concrete truck and vendor truck trips have been assumed for all segments that are considered for the operational traffic analysis. However, the concrete and vendor trucks would travel along primarily commercial or industrial streets in the Project vicinity, including National Boulevard, Venice Boulevard, Washington Boulevard, La Cienega Boulevard, and S. Robertson Boulevard, to get to or from the Project Site to the Interstate 10 (I-10) Freeway. Therefore, certain residential streets are excluded from the analysis of Project construction traffic noise impact.

Off-Site Noise Results

As indicated in **Table 4.10-11**, *Existing and Existing Plus Project Construction Vehicular Traffic Noise Levels*, the Project's concrete truck, vendor truck, and haul truck trips would increase existing traffic noise levels by a maximum of 4.3 dBA Leq and 3.6 dBA Leq along Cattaraugus Avenue south of Venice Boulevard and north of Venice Boulevard, respectively, where noise-sensitive uses (e.g., residential uses) are located within a "normally acceptable" or "conditionally acceptable" category. This increase would be less than the significance threshold of an increase of 5 dBA Leq for construction noise. Note that the Project will also implement Project Design Feature NOI-PDF-5, which would not allow construction haul trucks, concrete trucks, and vendor trucks to travel through neighborhood streets that are primarily residential uses. Impacts would be less than significant, and no mitigation is required.

TABLE 4.10-11
EXISTING AND EXISTING PLUS PROJECT CONSTRUCTION VEHICULAR TRAFFIC NOISE LEVELS

		Leq (dBA) [a, b]		
Roadway Segment	**Adjacent Land Use**	**Existing**	**Existing + Construction**	**Increase over Existing**
Cattaraugus Avenue				
North of Venice Blvd	Commercial/Residential	63.5	67.1	3.6
South of Venice Blvd	Commercial/Residential	63.5	67.9	4.4
Fairfax Avenue				
North of Washington Blvd	Commercial/Industrial	69.5	70.4	0.9
South of Washington Blvd	Commercial/Industrial	71.0	71.6	0.6
I-10 Westbound Offramp/Cadillac Avenue				
North of Venice Blvd	Commercial/Residential	70.0	70.7	0.7
South of Venice Blvd	Commercial/Residential	71.5	72.7	1.2
I-10 Westbound Offramp/Electric Drive				
North of Washington Blvd	Residential/Commercial	68.0	69.1	1. 1
South of Washington Blvd	Residential/Commercial	69.5	71.0	1.5
I-10 Westbound Offramp/Kincardine Avenue				
East of Robertson Blvd	Commercial/Residential	66.0	68.6	2.6
La Cienega Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Industrial/Residential	67.0	69.2	2.2
North of Venice Blvd	Commercial/Industrial/Residential	70.5	71.5	1.0
National Boulevard				
Between Ivy Station Driveway and Washington Blvd	Industrial/Residential/Commercial	69.2	70.8	1.6
Between Venice Blvd and Ivy Station Driveway	Industrial/Residential/Commercial	69.2	70.8	1.6
North of Venice Blvd	Industrial/Residential/Commercial	68.0	69.9	1.9
South of Washington Blvd	Industrial/Residential/Commercial	69.0	69.8	0.8

		Leq (dBA) [a, b]		
Roadway Segment	**Adjacent Land Use**	**Existing**	**Existing + Construction**	**Increase over Existing**
S Robertson Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Residential	66.7	68.1	1.4
North of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.5	72.1	0.6
North of Venice Blvd	Commercial/Residential	71.8	73.2	1.4
South of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.0	71.6	0.6
S Robertson Boulevard/Higuera Street				
South of Washington Blvd	Commercial/Residential	68.2	70.2	2.0
Venice Boulevard				
Between Cattaraugus Ave and La Cienega Blvd	Commercial/Residential	71.3	72.0	0.7
Between Helms Ave and Cattaraugus Ave	Commercial/Residential	71.1	71.9	0.8
Between La Cienega Blvd and I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.2	72.0	0.8
Between National Blvd and Helms Ave	Commercial/Residential	71.3	72.0	0.7
Between S Robertson Blvd and National Blvd	Commercial/Residential	71.7	72.4	0.7
East of I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.0	71.4	0.4
West of S Robertson Blvd	Commercial/Residential	71.8	72.2	0.4
Washington Boulevard				
Between Fairfax Ave and I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	69.7	70.9	1.2
Between Helms Ave and La Cienega Ave/McManus Ave	Commercial/Residential	66.8	68.9	2.1
Between Ince Ave/Washington Blvd and S Robertson Blvd/Higuera St	Commercial/Residential	62.8	65.3	2.5
Between La Cienega Ave/McManus Ave and Fairfax Ave	Commercial/Residential	67.2	69.1	1.9
Between Landmark St and National Blvd	Commercial/Residential	66.6	67.8	1.2
Between National Blvd and Wesley St	Commercial/Residential	67.4	69.4	2.0
Between S Robertson Blvd/Higuera St and Landmark St	Commercial/Residential	67.0	68.2	1.2
Between Wesley St and Helms Ave	Commercial/Residential	66.7	68.8	2.1
East of I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	69.2	69.9	0.7

[a] Calculated based on existing traffic volumes provided by Fehr & Peers, July 2022. Values are rounded to the nearest tenth decimal place. The distance from roadside receiver traffic noise level to roadway centerline was estimated using Web-based satellite imaging for each roadway segment analyzed.

[b] Residential roadway segments where haul trucks would not travel were removed.

SOURCE: ESA, 2022.

Operation

Operational Traffic Noise Compared to Existing Traffic Baseline Conditions

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

Project impacts are shown in **Table 4.10-12**, *Predicted Existing Vehicular Traffic Noise Levels.* As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.5 dBA CNEL, which would occur along Hutchinson Avenue, between Venice Boulevard and Washington Boulevard adjacent to residential uses. The increase in traffic noise levels along all modeled roadway segments would not exceed the significance threshold of a 3 dBA CNEL increase within the "normally unacceptable" or "clearly unacceptable" categories or the significance threshold of a 5 dBA CNEL increase within the "normally acceptable" or "conditionally acceptable" categories.

TABLE 4.10-12
PREDICTED EXISTING PLUS PROJECT VEHICULAR TRAFFIC NOISE LEVELS

		CNEL (dBA)[a]		
Roadway Segment	**Adjacent Land Use**	**Existing**	**Existing + Project**	**Increase over Existing**
Cattaraugus Avenue				
North of Venice Blvd	Commercial/Residential	63.8	63.8	0.0
South of Venice Blvd	Commercial/Residential	63.8	63.8	0.0
Fairfax Avenue				
North of Washington Blvd	Commercial/Industrial	69.8	69.8	0.0
South of Washington Blvd	Commercial/Industrial	71.3	71.3	0.0
Helms Avenue				
Between Venice Blvd and Washington Blvd	Residential	59.2	59.2	0.0
North of Venice Blvd	Residential	59.8	59.8	0.0
south of Washington Blvd	Residential	56.9	56.9	0.0
Hutchison Avenue				
Between Venice Blvd and Washington Blvd	Commercial/Residential	57.3	57.8	0.5
I-10 Westbound Offramp/Cadillac Avenue				
North of Venice Blvd	Commercial/Residential	70.3	70.3	0.0
South of Venice Blvd	Commercial/Residential	71.8	71.9	0.1
I-10 Westbound Offramp/Electric Drive				
North of Washington Blvd	Residential/Commercial	68.3	68.3	0.0
South of Washington Blvd	Residential/Commercial	69.8	69.8	0.0

Roadway Segment	Adjacent Land Use	CNEL (dBA)[a]		
		Existing	Existing + Project	Increase over Existing
I-10 Westbound Offramp/Kincardine Avenue				
East of Robertson Blvd	Commercial/Residential	66.3	66.3	0.0
West of Robertson Blvd	Residential	61.7	61.7	0.0
La Cienega Avenue/McManus Avenue				
South of Washington Blvd	Commercial/Industrial/ Residential	60.0	60.0	0.0
La Cienega Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Industrial/ Residential	67.3	67.3	0.0
North of Venice Blvd	Commercial/Industrial/ Residential	70.8	70.8	0.0
Landmark Street				
South of Washington Blvd	Residential	61.2	61.2	0.0
National Boulevard				
Between Ivy Station Driveway and Washington Blvd	Industrial/Residential/ Commercial	69.5	69.9	0.4
69.5Between Venice Blvd and Ivy Station Driveway	Industrial/Residential/ Commercial	69.5	69.7	0.2
North of Venice Blvd	Industrial/Residential/ Commercial	68.3	68.4	0.1
South of Washington Blvd	Industrial/Residential/ Commercial	69.3	69.5	0.2
S Robertson Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Residential	67.0	67.0	0.0
North of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.8	71.9	0.1
North of Venice Blvd	Commercial/Residential	72.1	72.3	0.2
South of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.3	71.4	0.0
S Robertson Boulevard/Higuera Street				
South of Washington Blvd	Commercial/Residential	68.5	68.5	0.0
Venice Boulevard				
Between Cattaraugus Ave and La Cienega Blvd	Commercial/Residential	71.6	71.7	0.1
Between Helms Ave and Cattaraugus Ave	Commercial/Residential	71.4	71.7	0.3
Between La Cienega Blvd and I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.5	71.6	0.1
Between National Blvd and Helms Ave	Commercial/Residential	71.6	71.7	0.1

Roadway Segment	Adjacent Land Use	CNEL (dBA)[a]		
		Existing	Existing + Project	Increase over Existing
Between S Robertson Blvd and National Blvd	Commercial/Residential	72.0	72.1	0.1
East of I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.3	71.3	0.0
West of S Robertson Blvd	Commercial/Residential	72.1	72.2	0.1
Washington Boulevard				
Between Fairfax Ave and I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	70.0	70.1	0.1
Between Helms Ave and La Cienega Ave/McManus Ave	Commercial/Residential	67.1	67.5	0.4
Between Ince Ave/Washington Blvd and S Robertson Blvd/Higuera St	Commercial/Residential	63.1	63.1	0.0
Between La Cienega Ave/McManus Ave and Fairfax Ave	Commercial/Residential	67.5	67.7	0.1
Between Landmark St and National Blvd	Commercial/Residential	66.9	66.9	0.1
Between National Blvd and Wesley St	Commercial/Residential	67.7	68.0	0.3
Between S Robertson Blvd/Higuera St and Landmark St	Commercial/Residential	67.3	67.4	0.1
Between Wesley St and Helms Ave	Commercial/Residential	67.0	67.3	0.3
East of I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	69.5	69.5	0.1
Wesley Street				
South of Washington Blvd	Residential	55.8	55.8	0.0

[a] Calculated based on existing traffic volumes provided by Fehr & Peers, July 2022. Values are rounded to the nearest tenth decimal place. The distance from roadside receiver traffic noise level to roadway centerline was estimated using Web-based satellite imaging for each roadway segment analyzed.

SOURCE: ESA, 2022.

The increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related traffic noise increases would be less than significant, and no mitigation measures are required.

Operational Traffic Noise Compared to Future (2026) Traffic Conditions

Future roadway noise levels were calculated the same arterial segments adjacent to the Project as compared to 2026 baseline traffic noise levels that would occur with implementation of the Project. Project impacts are shown in **Table 4.10-13**, *Predicted Future (2026) Vehicular Traffic Noise Levels*. As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.6 dBA CNEL, which would occur along Hutchinson Avenue, between Venice Boulevard and Washington Boulevard adjacent to residential uses. The increase in traffic noise levels along all modeled roadway segments would not exceed the significance threshold of a 3 dBA CNEL increase within the "normally unacceptable" or "clearly unacceptable" categories or the significance threshold of a 5 dBA CNEL increase within the "normally

acceptable" or "conditionally acceptable" categories. The increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related traffic noise increases would be less than significant, and no mitigation measures are required.

TABLE 4.10-13
PREDICTED FUTURE (2026) VEHICULAR TRAFFIC NOISE LEVELS

		CNEL (dBA) [a]		
Roadway Segment	**Adjacent Land Use**	**Future**	**Future + Project**	**Increase over Future**
Cattaraugus Avenue				
North of Venice Blvd	Commercial/Residential	63.9	63.9	0.0
South of Venice Blvd	Commercial/Residential	64.0	64.0	0.0
Fairfax Avenue				
north of Washington Blvd	Commercial/Industrial	69.9	69.9	0.0
south of Washington Blvd	Commercial/Industrial	72.2	72.2	0.0
Helms Avenue				
Between Venice Blvd and Washington Blvd	Residential	59.3	59.3	0.0
North of Venice Blvd	Residential	59.9	59.9	0.0
south of Washington Blvd	Residential	57.5	57.5	0.0
Hutchinson Avenue				
Between Venice Blvd and Washington Blvd	Commercial/Residential	57.4	58.0	0.6
I-10 Westbound Offramp/Cadillac Avenue				
North of Venice Blvd	Commercial/Residential	70.4	70.4	0.0
South of Venice Blvd	Commercial/Residential	72.1	72.1	0.1
I-10 Westbound Offramp/Electric Drive				
North of Washington Blvd	Residential/Commercial	69.7	69.7	0.0
South of Washington Blvd	Residential/Commercial	70.2	70.2	0.1
I-10 Westbound Offramp/Kincardine Avenue				
East of Robertson Blvd	Commercial/Residential	66.7	66.7	0.0
West of Robertson Blvd	Residential	61.8	61.8	0.0
La Cienega Avenue/McManus Avenue				
South of Washington Blvd	Commercial/Industrial/ Residential	60.2	60.2	0.0
La Cienega Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Industrial/ Residential	67.5	67.6	0.0
North of Venice Blvd	Commercial/Industrial/ Residential	71.0	71.0	0.0
Landmark Street				
South of Washington Blvd	Residential	61.3	61.3	0.0

Roadway Segment	Adjacent Land Use	CNEL (dBA) [a]		
		Future	Future + Project	Increase over Future
National Boulevard				
Between Ivy Station Driveway and Washington Blvd	Industrial/Residential/ Commercial	70.1	70.4	0.3
Between Venice Blvd and Ivy Station Driveway	Industrial/Residential/ Commercial	70.1	70.2	0.1
North of Venice Blvd	Industrial/Residential/ Commercial	68.7	68.9	0.2
South of Washington Blvd	Industrial/Residential/ Commercial	69.8	70.0	0.2
S Robertson Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Residential	68.4	68.4	0.0
North of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	72.2	72.2	0.0
North of Venice Blvd	Commercial/Residential	72.7	72.8	0.1
South of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	71.7	71.8	0.1
S Robertson Boulevard/Higuera Street				
South of Washington Blvd	Commercial/Residential	70.0	70.0	0.0
Venice Boulevard				
Between Cattaraugus Ave and La Cienega Blvd	Commercial/Residential	71.8	71.9	0.1
Between Helms Ave and Cattaraugus Ave	Commercial/Residential	71.7	72.0	0.3
Between La Cienega Blvd and I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.8	71.9	0.1
Between National Blvd and Helms Ave	Commercial/Residential	71.8	72.0	0.1
Between S Robertson Blvd and National Blvd	Commercial/Residential	72.3	72.4	0.1
East of I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.6	71.6	0.0
West of S Robertson Blvd	Commercial/Residential	72.5	72.6	0.1
Washington Boulevard				
Between Fairfax Ave and I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	71.1	71.2	0.1
Between Helms Ave and La Cienega Ave/McManus Ave	Commercial/Residential	67.8	68.1	0.3
Between Ince Ave/Washington Blvd and S Robertson Blvd/Higuera St	Commercial/Residential	64.0	64.0	0.0
Between La Cienega Ave/McManus Ave and Fairfax Ave	Commercial/Residential	68.2	68.3	0.1
Between Landmark St and National Blvd	Commercial/Residential	67.8	67.8	0.0
Between National Blvd and Wesley St	Commercial/Residential	68.4	68.7	0.3
Between S Robertson Blvd/Higuera St and Landmark St	Commercial/Residential	68.2	68.3	0.1
Between Wesley St and Helms Ave	Commercial/Residential	67.8	68.0	0.2
East of I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	69.9	69.9	0.0
Wesley Street				
South of Washington Blvd	Residential	56.6	56.6	0.0

[a] Calculated based on Future traffic volumes provided by Fehr & Peers, July 2022. Values are rounded to the nearest tenth decimal place. The distance from roadside receiver traffic noise level to roadway centerline was estimated using Web-based satellite imaging for each roadway segment analyzed.

SOURCE: ESA, 2022.

Operational Traffic Noise Compared to Future (2045) Traffic Conditions

Future roadway noise levels were also calculated along various arterial segments adjacent to the Project as compared to 2045 baseline traffic noise levels that would occur with implementation of the Project. Project impacts are shown in **Table 4.10-14**, *Predicted Horizon Year (2045) Vehicular Traffic Noise Levels*. As indicated, the maximum increase in Project-related traffic noise levels over 2045 baseline traffic noise levels would be 0.5 dBA CNEL, which would occur along Hutchinson Avenue between Venice Boulevard and Washington Boulevard. The increase in traffic noise levels along all modeled roadway segments would not exceed the significance threshold of a 3 dBA CNEL increase within the "normally unacceptable" or "clearly unacceptable" categories or the significance threshold of a 5 dBA CNEL increase within the "normally acceptable" or "conditionally acceptable" categories. The increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related traffic noise increases would be less than significant, and no mitigation measures are required.

TABLE 4.10-14
PREDICTED HORIZON YEAR (2045) VEHICULAR TRAFFIC NOISE LEVELS

		CNEL (dBA) [a]		
Roadway Segment	**Adjacent Land Use**	**Horizon**	**Horizon + Project**	**Increase over Horizon**
Cattaraugus Avenue				
North of Venice Blvd	Commercial/Residential	64.2	64.2	0.0
South of Venice Blvd	Commercial/Residential	64.3	64.3	0.0
Fairfax Avenue				
north of Washington Blvd	Commercial/Industrial	70.2	70.2	0.0
south of Washington Blvd	Commercial/Industrial	72.5	72.5	0.0
Helms Avenue				
Between Venice Blvd and Washington Blvd	Residential	59.7	59.7	0.0
North of Venice Blvd	Residential	60.3	60.3	0.0
south of Washington Blvd	Residential	57.8	57.8	0.0
Hutchinson Avenue				
Between Venice Blvd and Washington Blvd	Commercial/Residential	57.7	58.3	0.6
I-10 Westbound Offramp/Cadillac Avenue				
North of Venice Blvd	Commercial/Residential	70.7	70.7	0.0
South of Venice Blvd	Commercial/Residential	72.4	72.4	0.0
I-10 Westbound Offramp/Electric Drive				
North of Washington Blvd	Residential/Commercial	69.9	69.9	0.0
South of Washington Blvd	Residential/Commercial	70.5	70.5	0.0
I-10 Westbound Offramp/Kincardine Avenue				
East of Robertson Blvd	Commercial/Residential	67.0	67.0	0.0
West of Robertson Blvd	Residential	62.1	62.1	0.0

Roadway Segment	Adjacent Land Use	CNEL (dBA) [a]		
		Horizon	Horizon + Project	Increase over Horizon
La Cienega Avenue/McManus Avenue				
South of Washington Blvd	Commercial/Industrial/ Residential	60.5	60.5	0.0
La Cienega Avenue/McManus Avenue				
Between Venice Blvd and Washington Blvd	Commercial/Industrial/ Residential	67.8	67.9	0.1
North of Venice Blvd	Commercial/Industrial/ Residential	71.3	71.4	0.1
Landmark Street				
South of Washington Blvd	Residential	61.6	61.6	0.0
National Boulevard				
Between Ivy Station Driveway and Washington Blvd	Industrial/Residential/ Commercial	70.3	70.7	0.4
Between Venice Blvd and Ivy Station Driveway	Industrial/Residential/ Commercial	70.3	70.5	0.2
North of Venice Blvd	Industrial/Residential/ Commercial	69.0	69.1	0.1
South of Washington Blvd	Industrial/Residential/ Commercial	70.1	70.3	0.2
S Robertson Boulevard				
Between Venice Blvd and Washington Blvd	Commercial/Residential	68.6	68.6	0.0
North of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	72.5	72.5	0.0
North of Venice Blvd	Commercial/Residential	72.9	73.1	0.2
South of I-10 Westbound Off-Ramp/Kincardine Ave	Commercial/Residential	72.0	72.1	0.1
S Robertson Boulevard/Higuera Street				
South of Washington Blvd	Commercial/Residential	70.2	70.2	0.0
Venice Boulevard				
Between Cattaraugus Ave and La Cienega Blvd	Commercial/Residential	72.2	72.2	0.0
Between Helms Ave and Cattaraugus Ave	Commercial/Residential	72.0	72.3	0.3
Between La Cienega Blvd and I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	72.1	72.2	0.1
Between National Blvd and Helms Ave	Commercial/Residential	72.2	72.3	0.1
Between S Robertson Blvd and National Blvd	Commercial/Residential	72.6	72.7	0.1
East of I-10 Westbound Off-Ramp/Cadillac Ave	Commercial/Residential	71.9	71.9	0.0
West of S Robertson Blvd	Commercial/Residential	72.8	72.9	0.1
Washington Boulevard				
Between Fairfax Ave and I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	71.4	71.4	0.0
Between Helms Ave and La Cienega Ave/McManus Ave	Commercial/Residential	68.0	68.3	0.3

Roadway Segment	Adjacent Land Use	CNEL (dBA) [a]		
		Horizon	Horizon + Project	Increase over Horizon
Between Ince Ave/Washington Blvd and S Robertson Blvd/Higuera St	Commercial/Residential	64.3	64.3	0.0
Between La Cienega Ave/McManus Ave and Fairfax Ave	Commercial/Residential	68.5	68.6	0.1
Between Landmark St and National Blvd	Commercial/Residential	68.1	68.1	0.1
Between National Blvd and Wesley St	Commercial/Residential	68.7	68.9	0.2
Between S Robertson Blvd/Higuera St and Landmark St	Commercial/Residential	68.5	68.6	0.1
Between Wesley St and Helms Ave	Commercial/Residential	68.0	68.3	0.3
East of I-10 Westbound Off-Ramp/Electric Dr	Commercial/Residential	70.2	70.2	0.0
Wesley Street				
South of Washington Blvd	Residential	56.8	56.8	0.0

[a] Calculated based on Horizon traffic volumes provided by Fehr & Peers, July 2022. Values are rounded to the nearest tenth decimal place. The distance from roadside receiver traffic noise level to roadway centerline was estimated using Web-based satellite imaging for each roadway segment analyzed.

SOURCE: ESA, 2022.

Operational Fixed Mechanical Equipment Noise

The operation of mechanical equipment such as air conditioning equipment and an emergency generator may generate audible noise levels. A majority of the Project's mechanical equipment, including an emergency generator, would be located within enclosed mechanical rooms on a subterranean parking level. Mechanical equipment that would be fully shielded from nearby noise sensitive uses would avoid conflicts with adjacent uses and would not result in audible increases in noise levels. A mechanical area at the northwest corner of the building includes one mechanical unit that would be exposed on the top. The Project's mechanical equipment would be designed pursuant to Project Design Features NOI-PDF-4 and NOI-PDF-6. Pursuant to Project Design Feature NOI-PDF-6, exposed mechanical equipment would not exceed 55 dBA L_{eq} from 7:00 a.m. to 10:00 p.m. and 50 dBA L_{eq} from 10:00 p.m. to 7:00 a.m. at the neighboring property lines including the north and west property lines per the sound level limits of both City of Los Angeles and City of Culver City noise regulations. Project Design Feature NOI-PDF-4 requires that noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding. Implementation of Project Design Features NOI-PDF-4 and NOI-PDF-6 and compliance with existing regulations would ensure that operational noise impacts from mechanical equipment would not exceed the significance threshold and impacts would be less than significant. No mitigation measures are required.

Operational Parking Structure Noise

Vehicular access to the Project Site would be provided from one driveway on National Boulevard (right turn in/out) and one driveway on the proposed access alley through Venice Boulevard (right turn in/out) and Washington Boulevard (right turn in only). Proposed on-site garage would be operated from 7:00 a.m. to 8:00 p.m. with the garage being secured afterhours but accessible with

a key fob. For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from vehicles entering and exiting the Project's parking structure, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used (FTA, 2018).

Using the FTA's reference noise level of 92 dBA sound exposure level (SEL)[32] at 50 feet from the noise source for a parking lot, which includes slow-moving vehicles and engine start from parked vehicles. Assuming 200 vehicles per hour accessing each of the garage driveway entrance with an average speed of 10 miles per hour, the noise level would be 58 dBA Leq(1h) at a distance of 50 feet from the entrance. Noise levels from each of the proposed parking access driveways associated with slow-moving vehicles entering or leaving the garages, with additional attenuation from the distance to the nearest off-site sensitive receivers (R1, 250 feet to the north, -14 dBA; R2, 100 feet to the west, -6 dBA; R3, 120 feet to the south, -8 dBA; and R4, 370 feet to the east, -17 dBA) would not result in significant increases in ambient noise levels at the off-site sensitive receptor locations at R1 (north of Project Site, north of Venice Boulevard; 44 dBA Leq compared to the 62.6 dBA Leq ambient noise level), R2 (west of Project Site, west of National Boulevard; 52 dBA Leq compared to the 67.0 dBA Leq ambient noise level), R3 (south of Project Site, south of Washington Boulevard and east of National Boulevard; 50 dBA Leq compared to the 66.4 dBA Leq ambient noise level), or R4 (east of Project Site, south of Washington Boulevard and west of Helms Avenue; 41 dBA Leq compared to the 68.3 dBA Leq ambient noise level). As such, impacts would be less than significant, and no mitigation measures are required.

Operational Loading Dock Area Noise

Access for trucks and deliveries would be off of the existing alley on the south side of the Project Site via National Boulevard and via the proposed alley on the east side of the Project Site via both Venice Boulevard and Washington Boulevard. The loading docks would be located in subterranean garages and screened from the off-site sensitive receptors by the existing buildings located to the south and east of the Project Site.

Loading dock activities such as truck movements/idling and loading/unloading operations generate noise levels that have the potential to adversely impact adjacent land uses during long-term Project operations. Although the proposed loading areas would be enclosed and screened from the residential uses located to the west, north, and south of the Project Site, these off-site sensitive uses would be exposed to noise from truck access into the proposed alley leading to the garage entrances. At a distance of 100 feet, the closest distance between the off-site sensitive receptors and the alley access area, noise from loading truck activity would be 64.0 dBA L_{eq} at receptor R2. The existing daytime ambient noise level at R2 is 67.0 dBA L_{eq}. During the time periods that trucks maneuver into the loading area, the ambient noise level would be temporarily increased due to the contribution from trucks maneuvering, but the truck noise would be lower than the current daytime ambient noise levels and would not result in any noise level increase that is more than 5 dBA over the ambient noise level-based threshold (72.0 dBA at R2). Loading activity noise at off-site receptors R1 and R3 would be lower due to longer distance and intervening buildings, and would therefore be lower than the noise level estimated at R2. Pursuant to Project Design Feature NOI-PDF-7, on-

[32] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

site loading dock operational hours would be limited to 7:00 a.m. to 10:00 p.m. to limit potential noise impacts on adjacent sensitive receivers. In addition, loading truck activity is intermittent and would not result in a continuous permanent increase in ambient noise levels at nearby sensitive receptors. As such, impacts would be less than significant, and no mitigation measures are required.

Operational Outdoor Open Space Noise

The Project's internal courtyards could potentially have gatherings of employees and guests that are ancillary to normal business operations and that may include the use of outdoor speakers. Assuming there would be 975 people in the internal courtyard during a gathering, with half of the people (488) talking and half of the people (487) listening, and with the majority (450) of the people talking using 65 dBA raised voice level at 3 feet, and 38 people at 76 dBA loud voice level at 3 feet, the combined noise level would be equal to 95 dBA[33] at a distance of 3 feet. The internal courtyard is completely shielded on the north, east, and west sides by the on-site buildings, and would provide a minimum of 12 dBA noise reduction to the off-site receivers to the north, east, and west of the Project Site. The building at 8777 Washington Boulevard would also provide a minimum 12 dBA noise reduction to receivers to the south of 8777 Washington Boulevard. The nearest off-site sensitive receivers to the north are residences approximately 250 feet from the internal courtyard, which would receive 38 dBA noise attenuation from distance divergence, compared to the noise level measured at 3 feet. Therefore, noise from people in the internal courtyard would result in 45 dBA at the nearest residences to the north across Venice Boulevard. Ambient noise measured at the receiver north of Venice Boulevard was 62.6 dBA Leq during daytime hours and 65.8 dBA Leq during evening hours, noise from the internal courtyard would not have any significant impact to sensitive receivers to the north of the Project Site. With traffic noise on Venice Boulevard providing a masking effect, noise from the entrance area along Venice Boulevard would not result in any significant increase in ambient noise.

Similarly, the nearest off-site sensitive receivers to the west are residences approximately 100 feet from the internal courtyard, which would receive 30 dBA noise attenuation from distance divergence, compared to noise level measured at 3 feet. Therefore, noise from people in the internal courtyard would result in 53 dBA at the nearest residences to the west across National Boulevard. Ambient noise measured at the receiver west of National Boulevard was 67.0 dBA Leq during daytime hours and 67.6 dBA Leq during evening hours, noise from the internal courtyard would not have any significant impact to sensitive receivers to the west of the Project Site. With traffic noise on National Boulevard providing a masking effect, noise from the internal courtyard would not result in a significant increase in ambient noise. Therefore, impacts would be less than significant, and no mitigation measures are required.

In addition, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,326 sf of which would be landscaped along Washington Boulevard. The publicly accessible, privately maintained amenity area would be located in the southeast corner of the Project Site and would be accessed from Washington Boulevard. In addition to landscaping, the purpose of the publicly accessible, privately maintained amenity area is to provide a small park-like setting with seating, or a flexible combination of coffee kiosk, bicycle co-op or flexible

[33] $10 \text{ Log } [2x10^{8.9} + 20x10^{7.6} + 58x10^{6.5}] = 94$ dBA at a distance of 3.3 feet.

programed activities. This open space would be a potential noise source for the nearest residential uses at sensitive receptor location R3 (residential uses on south side of Washington Boulevard, approximately 150 feet from the southern end of the parklet). Under a highly conservative scenario, the open space could generate approximately 120 visitors on the open space at one time.[34] The noise level from normal human conversation would be approximately 55 dBA per person (speaking) at a distance of 3 feet.[35] For the purposes of this analysis, assuming people speaking with louder voice levels, conservatively assuming half of the visitors would be talking simultaneously (i.e., 60 people), with the majority (50) of the people talking using 65 dBA raised voice level at 3 feet, and 10 people at 76 dBA loud voice level at 3 feet, the continuous noise level could be up to approximately 87 dBA at 3 feet. Based on a noise level of 87 dBA at a reference distance of 3 feet, and accounting for distance attenuation of 150 feet to the nearest sensitive receivers on the south side of Washington Boulevard (34 dBA reduction at R3), the noise level from the amenity area would be 53 dBA at the R3 noise sensitive receptors along Washington Boulevard, which would not exceed the significance threshold of 69 dBA.[36]

Pursuant to Section 9.07.055 of the CCMC, the operation of amplifying equipment for use on an ongoing basis shall not be audible at the Project property line. According to Project Design Feature NOI-PDF-8, all permanent sound systems within outdoor open space areas would be designed and installed so as to not result in a greater than 3 dBA increase in ambient conditions, which would be considered an audible increase, at the Project property line. The Project would be compliant with CCMC Section 9.07.055, and associated noise impacts would be less than significant with no mitigation measures required.

Mitigation Measures

Construction

The following mitigation measures would reduce on-site construction-related noise levels:

> **NOI-MM-1:** Prior to the commencement of demolition, the Project shall provide a temporary 12-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north and west. In addition, a temporary 6-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 5 dBA along the southern boundary along Washington Boulevard, between the Project Site and the residences to the south and east of the Project Site. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the nearby noise-sensitive receptors during the duration of construction activities to the extent feasible. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities,

[34] The amenity area is approximately 7,120 sf and is designed to accommodate 120 persons.

[35] American Journal of Audiology (AJA), Average Speech Levels and Spectra in Various Speaking/Listening Conditions, A Summary of the Pearson, Bennett, & Fidell (1977) Report, Vol. 7 21-25, doi:10.1044/1059-0889(1998/012), October 1998, https://aja.pubs.asha.org/article.aspx?articleid=1773811. Accessed July 13, 2022.

[36] The amenity area noise level of 53 dBA Leq at R3 would be less than the existing ambient noise levels of 64 dBA Leq by 11 or more dBA and would be 16 dBA lower than the ambient-based threshold of 69 dBA Leq; therefore, it would not contribute an audible increase in the existing ambient noise levels at R3.

deliveries, and site access by construction personnel. At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions.

NOI-MM-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA.[37] The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

Operation

Operational noise impacts would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

As indicated in **Table 4.10-11**, *Existing and Existing Plus Project Construction Vehicular Traffic Noise Levels*, the Project's concrete truck, vendor truck, and haul truck trips would increase existing traffic noise levels by a maximum of 4.3 dBA Leq and 3.6 dBA Leq along Cattaraugus Avenue south of Venice Boulevard and north of Venice Boulevard, respectively, where noise-sensitive uses (e.g., residential uses) are located within a "normally acceptable" or "conditionally acceptable" category. This increase would be less than the significance threshold of an increase of 5 dBA Leq for construction noise. Impacts would be less than significant, and no mitigation is required.

Off-site receptor locations at R1, R2 and R3 have more than two-story buildings in their respective area that they represented, and these buildings have upper floor receivers/units that have outdoor living areas, particularly on the side facing the Project construction areas, that would be exposed to construction noise from the Project Site. Mitigation Measure NOI-MM-1 would provide at least a 10 dBA noise reduction at ground-floor sensitive receptors R1 and R2, and 5 dBA noise reduction at sensitive receptors R3 and R4. Mitigation Measure NOI-MM-2 requires that muffler systems provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system.[38] As shown in **Table 4.10-15**, *Mitigated Construction Noise Impacts,* construction noise impacts would be reduced by a level that is technically feasible as set forth in Mitigation Measures NOI-MM-1 and NOI-MM-2 and consistent with Policy 2.A of the City of Culver City General Plan Noise Element. With implementation of mitigation measures, maximum construction noise levels would not increase ambient noise levels at any of the ground-floor noise-sensitive receptor locations above the applicable thresholds of significance. However, with respect to on-site

[37] FHWA, Special Report – Measurement, Prediction, and Mitigation, Chapter 4 Mitigation, last updated June 28, 2017, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm20. Accessed July 13, 2022.

[38] According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. FHWA, Special Report – Measurement, Prediction, and Mitigation, Chapter 4 Mitigation.

construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor areas of the sensitive residential units, due to technical limitations including barrier foundation needs and wind load capacities. As such, as shown in Table 4.10-15, noise levels at the upper floors of receptor locations at R1, R2 and R3 would exceed the significant noise impact threshold after implementation of the prescribed mitigation measures. Accordingly, these impacts would be significant and unavoidable.

TABLE 4.10-15
MITIGATED CONSTRUCTION NOISE LEVELS

Off-Site Sensitive Land Uses	Ambient Noise Levels (Afternoon/Night)	Estimated Maximum Construction Noise Levels – Mitigated (dBA L_{eq})	Lowest Ambient-Based Threshold	Exceed Threshold?
Ground Floors				
R1	62.6/65.8	62.7	67.6	No
R2	67.0/67.6	70.6	72.0	No
R3	66.4/64.0	69.0	69.0	Yes
R4	68.3/59.6	54.4	64.6	No
Upper Floors				
R1	62.6/65.8	72.7	67.6	Yes
R2	67.0/67.6	80.6	72.0	Yes
R3	66.4/64.0	74.0	69.0	Yes

SOURCE: ESA, 2022.

As indicated above, LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. In the event construction occurs outside of the permitted hours without approval from the respective jurisdiction, as applicable, a significant impact would occur from any construction-related noise. However, it is anticipated that the Project would obtain approval from the respective jurisdiction, as applicable, to initiate construction as early as 7:00 a.m. and end as late as 10:00 p.m. During these extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) noise levels could exceed the thresholds as shown in Table 4.10-15 even with mitigation, and for this reason, would be considered a significant and unavoidable impact.

Operation

Operational noise impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold NOI-2: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis

Construction

Construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, and haul trucks, etc.) generates vibrations that propagate through the ground and diminish in intensity with distance from the source. While construction of the Project would not use impact pile driving, vibratory pile installation equipment would be used during construction. The most likely construction activity that could extend to the evening hours is the finishing activity, which could occur until 10:00 p.m. Finishing is completed with hand tools or an electric-powered rotor (e.g., a floor polisher for concrete). However, it is acknowledged that other phases of construction could extend into the later evening hours intermittently. Accordingly, the analysis conservatively accounts for this potential intermittent construction activity

Potential for Building Damage

The PPV vibration velocities for several types of construction equipment that can generate perceptible vibration levels are identified in **Table 4.10-16,** *Vibration Source Levels for Construction Equipment*. Based on the information presented in Table 4.10-16, vibration velocities could range from 0.0004 to 0.011 in/sec PPV at 100 feet from the source of activity which would be below the structural damage significance threshold of 0.2 in/sec PPV.

TABLE 4.10-16
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Pile Driver (vibratory/sonic)	0.170	0.060	0.050	0.040	0.020	93	84	82	79	75

SOURCE: FTA, 2018; ESA, 2022.

Since evaluation of potential building damages considers the building itself, not the property line, the distances from the vibration sources are calculated at the building edge. The nearest off-site vibration-sensitive building to the Project Site is the Helms Bakery Building 20 feet to the east of the Project Site boundary. The Helms Bakery Building is a historic building. The existing Helms alley separates the Project Site from the Helms Bakery Building. Table 4.10-16 shows that the vibration level generated by a sonic/vibratory pile driver is 0.170 in/sec PPV (the equivalent of 93 VdB) and a large bulldozer would be 0.089 in/sec PPV (the equivalent of 87 VdB) at the reference distance of 25 feet. At a distance of 20 feet from the sonic/vibratory pile driver or the bulldozer,

the vibration level would be approximately 0.250 in/sec (the equivalent of 96 VdB) for the sonic/vibratory pile driver or 0.126 in/sec (the equivalent of 90 VdB) for the bulldozer. This range of vibration levels would be lower than the significance threshold for building damage of 0.300 in/sec PPV (the equivalent of 98 VdB), as shown in Table 4.10-1, for engineered concrete and masonry (no plaster) buildings, such as the Helms Bakery Building. Therefore, Project construction would not generate groundborne vibration in excess of the structural damage thresholds for the Helms Bakery Building. Other buildings in further proximity to the Project Site than the Helms Bakery Building, such as the adjacent office building at 8777 Washington Boulevard and more distant residential uses (i.e., receptors R1, R2, and R3) would experience lower groundborne vibration levels than the Helms Bakery Building. Accordingly, these more distant buildings would not be subject to vibration levels that exceed the threshold in Table 4.10-1. Therefore, vibration impacts from on-site construction activities would be less than significant with respect to structural damage.

It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. It is assumed that road surfaces in and around the Project Site are generally smooth, with uneven spaces not substantially present that could provide areas that generate significant sources of groundborne vibration. Therefore, no significant Project-related structural damages groundborne vibration impacts would occur from on-road construction vehicles.

Potential for Human Annoyance

Human annoyance vibration impacts are evaluated within the building, not at the property line, because people inside a building would be exposed to windows rattling and movement of the structure making vibration effects very perceptible, whereas such effects do not occur in an outdoor environment, making vibration impacts far less perceptible. Therefore, when assessing human annoyance impacts, the vibration levels are also analyzed at the building edge.

With respect to human annoyance vibration impacts, the nearest vibration-sensitive uses are the R2 residential uses at a distance of 100 feet to the Project Site. At a distance of 100 feet, Table 4.10-16 shows that these residential uses would be exposed to vibration levels ranging from approximately 40 VdB to 75 VdB (0.004 in/sec to 0.020 in/sec PPV), which would not exceed the threshold of 72 VdB (0.016 in/sec PPV) for residential uses as shown in Table 4.10-2. Other residential buildings and vibration sensitive uses that are further away from the Project Site would experience lower groundborne vibration levels than R2 from Project construction, and therefore would not be subject to significant human annoyance impacts. Therefore, impacts would be less than significant with respect to human annoyance, and no mitigation measures are required.

It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. As discussed above, per FTA guidance, the significance criterion for human annoyance is 72 VdB for sensitive uses, including residential, hotel and theater uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless the road surface is not smooth. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 25 feet

of the sensitive use (residential and hotel use) along Venice Boulevard, Washington Boulevard, S. Robertson Boulevard, and National Boulevard. Temporary vibration levels could reach approximately 72 VdB periodically as heavy-duty construction trucks, including haul trucks and concrete trucks, pass sensitive receptors along the anticipated haul route(s). Therefore, the residential uses along National Boulevard, Washington Boulevard, S. Robertson Boulevard, and Venice Boulevard (between the Project Site and I-10), would be exposed to ground-borne vibration up to 72 VdB, which would be at the 72-VdB significance criteria from the heavy-duty construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. However, traffic travelling on public roadways, including haul trucks on the haul routes, is beyond the control of the proposed Project. In addition, Project-related heavy-duty construction trucks would be restricted to the designated haul routes (Venice Boulevard, Washington Boulevard, National Boulevard, and La Cienega Boulevard) and avoid other neighborhood streets, so that this potential impact is minimized. Potential vibration impact associated with haul trucks traveling on public roadways would remain significant and unavoidable.

Operation

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. Groundborne vibration generated by the above-mentioned activity would generate approximately up to 50 VdB adjacent to the Project Site.[39] The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 72 VdB for perceptibility. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant, and no mitigation measures are required.

Mitigation Measures

Vibration impacts from on-site construction and operational activities as it relates to structural damage and human annoyance were determined to be less than significant. However, no feasible or practical mitigation measures are available to reduce vibration impact associated with haul trucks, and off-site construction related haul trucks traveling on public roadways would remain significant and unavoidable.

Level of Significance After Mitigation

Vibration impacts from on-site construction and operational activities as it relates to structural damage and human annoyance were determined to be less than significant without mitigation. However, no feasible or practical mitigation measures are available to reduce vibration impact associated with haul trucks, and off-site construction related haul trucks traveling on public roadways would remain significant and unavoidable.

[39] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, Section 7.2.1.

Threshold NOI-3: 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?

As discussed in the Initial Study (Appendix A of this Draft EIR), 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 over approximately 3 miles west and 5 miles southwest of the Project Site, respectively (as the crow flies). Therefore, no impacts would occur, and no further analysis is warranted.

Cumulative Impacts

Impact Analysis

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. Noise would normally affect the areas immediately adjacent to the source, specifically areas that are less than 500 feet. Cumulative noise impacts could occur at receptor locations that are within 500 feet from two different sources. Therefore, based on a 500-foot screening distance, the cumulative noise impacts analysis is limited to related projects within 1,000 feet of the Project Site. The 1,000-foot distance is based on an assumption that a noise-sensitive receptor would be located halfway between the Project Site and the related project. However, the cumulative impacts on roadway noise would be affected by traffic from all cumulative projects throughout a larger vicinity.

As discussed in Chapter 3, *Environmental Setting,* of this Draft EIR, there are 52 related projects identified in the vicinity of the Project. The related projects within approximately 1,000 feet of the Project Site are as follows:

- Related Project No. 5 at 8700 Washington Boulevard (apartments, live/work office, restaurant, and retail) is located approximately 440 feet to the east of the Project Site.
- Related Project No. 8 at 3336 Helms Avenue (condominiums) is located approximately 620 feet to the east of the Project Site.
- Related Project No. 9 at 3434 Wesley Street (apartments and office) is located approximately 400 feet to the southeast of the Project Site.
- Related Project No. 11 at 3710 Robertson Boulevard (apartments, creative office, and commercial) is located approximately 730 feet to the southwest of the Project Site.
- Related Project No. 14 at 3939 Landmark Street (school) is located approximately 670 feet to the southwest of the Project Site.
- Related Project No. 15 at 8888 Washington Boulevard (office and retail) is located approximately 830 feet to the southwest of the Project Site.

The potential for noise impacts to occur are specific to the location of each related project as well as cumulative traffic on the surrounding roadway network.

Construction Noise

On-Site Construction Noise

Six of the related projects (Related Project Nos. 5, 8, 9, 11, 14, and 15) are located within approximately 1,000 feet of the Project Site and could contribute to cumulative construction noise impacts from on-site construction activities to off-site sensitive receptors if they are under construction at the same time as the Project. Each of these related projects are required to comply with the noise standards and ordinances of the City of Culver City and City of Los Angeles, as applicable. Exact construction schedules for these related projects are not known. It is not possible to predict whether construction of these related projects would overlap with construction of the Project. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as the Project. Because the Project would result in potentially significant construction noise impacts prior to mitigation measures, cumulative on-site noise from the Project and related projects could result in potentially significant cumulative construction noise impacts at similar off-site receptors and receivers between the Project Site and the nearest related project sites.

Off-Site Construction Noise

With regard to off-site construction noise, construction traffic from all related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. As shown in Table 4.10-11, the Project's construction vehicle trips would increase existing traffic noise levels by a maximum of 4.3 dBA Leq and 3.6 dBA Leq along Cattaraugus Avenue south of Venice Boulevard and north of Venice Boulevard, respectively. If related projects contribute to an increase in construction vehicle trips along the same roadway segments and at the same time as the Project, the cumulative increase in construction traffic noise would be greater and could exceed the significance threshold of 5 dBA Leq. While exact construction schedules and construction truck trips for these related projects are not known, it is conservatively assumed that construction of the six related projects within 1,000 feet of the Project Site could occur at the same time as the Project and could include the number of construction truck trips that would generate noise in excess of the significance threshold. For the purposes of this analysis, the number of construction trucks from related projects that would be needed to exceed the significance threshold is estimated to determine the potential for impacts.

As shown in Table 4.10-11, the Project would not result in any significant off-site construction noise impacts due to construction trips. The roadway in the vicinity of the Project Site that would have off-site construction noise levels from Project construction trucks closest to the significance threshold would be Cattaraugus Avenue south of Venice Boulevard, which would have a maximum of up to 63 Project truck trips per hour (heavy-duty concrete, vendor, and haul trucks from overlapping Project construction activities), which would generate a combined Existing plus Project Construction Traffic noise level of approximately 67.9 dBA Leq (an increase of 4.3 dBA from the Existing baseline traffic noise level 63.5 dBA Leq). Related projects contributing an additional 8 heavy-duty truck trips per hour on the same roadway segment at the same time as the Project would generate a combined noise level of approximately 68.5 dBA L_{eq}. This cumulative

noise level would be equal to the significance threshold of (63.5 + 5 =) 68.5 dBA on Cattaraugus Avenue south of Venice Boulevard in the vicinity of the Project Site. Therefore, related projects contributing more than 8 truck trips concurrently with the Project would result in a cumulatively considerable contribution to off-site construction noise and impacts would be significant. It is conservatively assumed that truck traffic from multiple related projects could potentially overlap on some days and generate noise in excess of the significance threshold.

Therefore, given that it is possible that the Project and related projects could contribute to cumulative off-site construction traffic noise levels and could exceed a significance threshold with sufficiently high cumulative traffic levels, cumulative off-site construction traffic noise impacts would be potentially significant.

Operation Noise

On-Site Operational Noise

Both City of Los Angeles and City of Culver City have provisions that limit stationary-source noise from items such as roof-top mechanical equipment that would ensure noise levels would be less than significant at the property line for each related project. Further, noise from other stationary sources, including parking structures, open space activity and loading docks would be limited to areas in the immediate vicinity of each related project. With the noise attenuation of 6 dBA per doubling of distance from the noise source, receivers outside of a distance of 200 feet from any noise source would receive a 12 dBA noise reduction compared to the noise level received at 50 feet from that noise source. Although each related project could potentially impact an adjacent sensitive use in its own vicinity, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site, which is more than 200 feet from other related projects. As the Project's composite stationary-source impacts would be less than significant, the Project's cumulative on-site stationary-source noise impacts would be less than significant.

Off-Site Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The noise levels associated with existing base traffic volumes without the Project, and cumulative base traffic volumes with the Project are provided in Table 4.10-13 and Table 4.10-14, above.

Tables 4.10-13 and 4.10-14 show the Project's contribution to the cumulative noise levels during year 2026 and year 2045. The maximum cumulative (both 2026 and 2045) noise increase from the Project plus cumulative project traffic would be 0.6 and 0.5 dBA CNEL, respectively which would occur along Hutchinson Avenue between Venice Boulevard and Washington Boulevard adjacent to residential. This increase in sound level would be below a 3 dBA increase in areas within "normally unacceptable" zone or a 5 dBA increase in areas within a "normally acceptable" zone, and the increase in sound level would be lower at the remaining roadway segments analyzed. The

Project-related noise increases contribution to the cumulative traffic noise impacts would be less than significant, and no mitigation measures would be required.

Construction Groundborne Vibration

On-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. None of the related projects are located adjacent to the sensitive receptors identified for the Project. Vibration attenuates at high rates with distance. Therefore, construction vibration would only affect sensitive uses located directly adjacent to the Project and related projects. Therefore, construction of the Project, when considered together with the related projects, would not result in a cumulatively considerable contribution and would have a less-than-significant cumulative impact with regard to on-site groundborne vibration (structural damage and human annoyance).

Off-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. As discussed above, construction of the Project, both on-site and off-site, would not result in significant vibration impacts related to structural damage. However, the Project would result in vibration impacts related to human annoyance. As such, should construction traffic of the Project and related projects overlap, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul route(s) would be significant. Therefore, cumulative off-site construction vibration impacts would be potentially significant.

Operational Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. As such, the Project's contribution to impacts related to groundborne vibration during operation would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

Refer to Mitigation Measures NOI-MM-1 and NOI-MM-2 to reduce cumulative on-site construction noise impacts. With respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units at receptor locations R1, R2 and R3, due to technical limitations including barrier foundation needs and wind load capacities. Furthermore, for off-site sensitive receivers along

the haul routes, the installation of sound barriers would be inappropriate for residential land uses that face the roadway as it would be impractical and create aesthetic and access concerns. Thus, there are no feasible mitigation measures that could be implemented to reduce the temporary cumulative off-site construction traffic noise and vibration impacts.

A significant and unavoidable cumulative vibration impact would occur as a result of off-site construction haul trucks traveling on the designated haul routes, which all of them are public roads. No feasible or practical mitigation measures are available to reduce this impact.

Cumulative impacts related to on-site construction vibration impacts and operational noise and vibration would not occur.

Level of Significance After Mitigation

On-Site Construction Noise

As discussed for the Project, after implementation of mitigation, the Project would result in significant and unavoidable construction noise impacts. Any additional construction noise from the related projects that could combine with the Project's construction noise, would further increase the extent of the Project's significant and unavoidable impacts. Therefore, the Project's contribution to cumulative construction noise would be cumulatively considerable and would represent a significant and unavoidable impact.

Off-Site Construction Noise

The Project would result in less than significant off-site construction noise impacts. However, the related projects could generate construction truck trips, when added to the Project's construction vehicle trips, that could generate noise in excess of the significance threshold. Therefore, the Project's contribution to cumulative off-site construction noise would be cumulatively considerable and would represent a significant and unavoidable impact. No additional feasible mitigation measures are available for the Project to implement to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within the Project Site area that could be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would be impractical and create aesthetic and access concerns. Therefore, given that it is possible that the Project and related projects could contribute to cumulative off-site construction traffic noise levels and could exceed a significance threshold with sufficiently high cumulative traffic levels, cumulative off-site construction traffic noise impacts would be temporarily significant and unavoidable.

On-Site Operational Noise

Cumulative impacts regarding operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Off-Site Operational Noise

Cumulative impacts regarding off-site operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Construction Groundborne Vibration

Cumulative impacts regarding off-site construction groundborne vibration would be potentially significant without mitigation. However, no feasible mitigation measures are available for off-site construction truck route vibration impacts, the impact would remain significant and unavoidable.

Operational Groundborne Vibration

Cumulative impacts regarding operational groundborne vibration would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.11 Public Services

4.11.1 Fire Protection

4.11.1.1 Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site as provided by the Culver City Fire Department (CCFD) and Los Angeles Fire Department (LAFD). This analysis is based in part on information available on the CCFD and LAFD websites, and correspondence from CCFD and LAFD, which are included in Appendix L of this Draft EIR.

4.11.1.2 Environmental Setting

Regulatory Setting

There are several plans, policies, and programs regarding Fire Protection at the federal, state, and local levels. Described below, these include:

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Vehicle Code
- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services
- California Fire Service and Rescue Emergency Aid System
- Culver City General Plan Safety Element
- Culver City Municipal Code
- Culver City Fire Department 2019 Community Risk Assessment & Standards of Cover
- Los Angeles General Plan Framework Element
- Los Angeles General Plan Safety Element
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles Municipal Code
- Los Angeles Charter
- Los Angeles Propositions F and Q
- Los Angeles Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

Federal

Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include the following:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a

reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

State

California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by State agencies without change from a national model code, building standards based on a national model code that have been changed to address particular California conditions, and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas.

California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[2] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety...(c) All pedestrian upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

1 *California Building Code* (CCR, Title 24, Part 2).

2 A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In City of Hayward v. Trustee of California State University (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services."[3] The Hayward ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings" and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."[4]

California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the State's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the State. It also serves as the lead agency for mobilizing the State's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the statewide mutual aid system (see discussion of Mutual Aid Agreements, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

California Fire Service and Rescue Emergency Aid System

Both CCFD and LAFD participate in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the

[3] *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 843, 847.
[4] *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 843, 847.

California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[5] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and state levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The CCFD and LAFD are located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.[6]

Local

City of Culver City

Culver City General Plan Safety Element

The 1975 Public Safety Element of the Culver City General Plan contains the following fire protection policies applicable to the Project:[7]

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

Culver City Municipal Code

Subsections within Section 9.02 (Fire Prevention) of the Culver City Municipal Code (CCMC) applicable to fire protection and EMS services at the Project Site include, but are not limited to, the following:

> Section 9.02.005 (Adoption of the 2019 CFC): Adopts the 2019 CFC with amendments as the City of Culver City Fire Code (Fire Code).
>
> Section 9.02.035 (Locks for CCFD Access): All noted gates and exterior doors shall be provided with locks for CCFD access - keys shall be provided in KNOX boxes.
>
> Section 9.02.040 (Automatic Fire Sprinkler Systems): An automatic fire-extinguishing (sprinkler) system shall be installed in every new building in the City, hereinafter constructed or moved into the City, regardless of area separation or type of construction.

Section 9.02.065 (Fire Hydrant Spacing): Fire hydrant spacing in commercial/industrial areas shall be not more than 300 feet apart. The maximum distance of a fire hydrant to a Fire Department

[5] California Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, *Mutual Aid Plan*, revised April 2019.

[6] Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

[7] City of Culver City, *Culver City General Plan*, Public Safety Element, adopted August 25, 1975.

Connection (FDC) shall not exceed 100 feet. Other sections of the CCMC applicable to fire protection services at the Project Site include, but are not limited to, the following:

> Section 9.08.385 (Authority to Close Streets): This section requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work.
>
> Section 17.540 (Site Plan Review): This section provides procedures and standards for the comprehensive review of proposed development projects to: ensure compliance with the required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial, and public areas of the City. As such, this section may require new projects to be reviewed by the CCFD to ensure that fire related measures are incorporated.
>
> Section 17.560 (Comprehensive Plans): This section provides procedures and standards for Comprehensive Plans, including required findings to ensure that the proposed development is capable of creating an environment of sustained desirability and stability and will not be substantially detrimental to present and potential surrounding uses. As part of the Comprehensive Plan process, the Planning Department circulates project plans to other City departments for review and comment, including to the CCFD.

Culver City Fire Department 2019 Community Risk Assessment & Standards of Cover

CCFD's 2019 Community Risk Assessment & Standards of Cover (CRA) serves as the CCFD's Integrated Risk Management Plan. The CRA defines the process, known as "deployment analysis," as a written procedure which determines the distribution and concentration of fixed and mobile resources of an organization. The purpose for completing such a document is to assist the agency in ensuring a safe and effective response force for fire suppression, emergency medical services, and specialty response situations. The CRA serves as: (1) the basis for continually measuring service level performance; (2) a predictive tool for helping to determine workload and ideal unit utilization; (3) a management tool for determining apparatus type and staffing levels; (4) a descriptive tool for validating service levels; and (5) a baseline tool for defining service level objectives. Performance measures set forth in the CRA applicable to the Project include, but are not limited to, the following:[8]

Response Time Goals: Response time goals for fire suppression, technical rescue and HazMat are 7 minutes for the first due-in unit and 8 minutes for the Effective Response Force (ERF), 90 percent of the time. Response time goals for emergency medical services (EMS) are 6 minutes, 20 seconds for the first due-in unit and 9 minutes, 50 seconds for the ERF, 90 percent of the time. It is noted that the above are goals, not standards.

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

High/Special Risk Fire Response: High and Special Fire Risk incidents in the City represent unique critical tasking situations where there is very little historical response information to base tasking upon. These types of incidents are addressed with the region's mutual aid agreements to

8 Culver City Fire Department (CCFD), *Community Risk Assessment: Standards of Cover*, 2019.

help augment City resources. For example, the minimum mutual aid request to meet the demands of a high/special risk fire is an "A Assignment," (i.e., one truck company (5 personnel), three engine companies (12 personnel), two rescue ambulances (4 personnel), two battalion chiefs (4 personnel), and one EMS Supervisor (1 personnel), requiring a total of 26 personnel to assist with the incident).

City of Los Angeles

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table 4.11.1-1**, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies*. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.[9] Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[10] This is consistent with the specifications for response distances within the Los Angeles Municipal Code (LAMC).

Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in **Table 4.11.1-2**, *Relevant General Plan Safety Element Goals, Objectives, and Policies*. In addition, the City's Safety Element designates disaster routes. As shown in the Safety Element, the closest east/west-trending Selected Disaster Route includes Venice Boulevard, which forms the northern boundary of the Project Site. The nearest north/south trending Selected Disaster Route includes Robertson Boulevard approximately 760 feet to the west of the Project Site.

9 City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 9: Infrastructure and Public Services, originally adopted December 11, 1996, and readopted August 8, 2001.

10 City of Los Angeles Department of City Planning, *General Plan Framework Element*, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire, originally adopted December 11, 1996, and readopted August 8, 2001.

TABLE 4.11.1-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC SERVICE GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.2	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

TABLE 4.11.1-2
RELEVANT GENERAL PLAN SAFETY ELEMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. [All Emergency Operations Organization (EOO) emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site

Goal/Objective/Policy	Description
	selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: • Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. • The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gallons per minute (gpm) would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm, not less than 3 engine companies and 2 truck companies. These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]

SOURCE: City of Los Angeles, General Plan Safety Element, 2021.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. With regard to fire protection, the West Adams–Baldwin Hills–Leimert Community Plan includes the following policies:

> **CF3-1: Evaluate Land Use Impacts on Fire Service Demand.** Coordinate with LAFD as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on fire service demands.

CF3-3: Adequate Fire Service Facilities and Personnel. Assist the LAFD in ensuring that adequate facilities and fire service personnel are maintained by periodically evaluating population growth, level of service (response time and staffing) and fire hazards in the City.

Los Angeles Municipal Code

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The City's Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. Specific regulations regarding fire prevention and protection are discussed below.

Section 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

Section 57.4704.5.1 of the LAMC requires that the Smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

Section 57.503.1.4 requires an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway.

Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch

(psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved fire hydrant. The site-specific number and location of fire hydrants would be determined as part of LAFD's fire/life safety plan review for each development.

Section 57.507.3.3 limits the maximum response distances (driving distances) to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project.

Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

Los Angeles Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least two acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 19 new or replacement neighborhood Fire/Paramedic Stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[11] Also, as reported in November 2019, the Los Angeles Bureau of Engineering completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.[12] Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand, and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing,

[11] Los Angeles Fire Department, *Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report*, February–March 2016.

[12] City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.

remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[13]

Los Angeles Measure J

Measure J, which was approved by voters at the November 7, 2006 General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres.

Los Angeles Fire Department Strategic Plan 2018–2020

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD through 2020: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development.

Existing Conditions

Fire Protection Facilities and Services

City of Culver City

Fire prevention, fire suppression, life safety, and emergency medical services within the City of Culver City are provided by the CCFD, which is supported through mutual aid agreements with fire departments in the City of Los Angeles and the Los Angeles County, with further assistance from the cities of Beverly Hills, Santa Monica, and West Hollywood, when needed.[14] The CCFD provides fire protection to an existing population of approximately 40,000 persons and is made up of a total of 72 employees who are housed at three fire stations. Each fire station is equipped with unique equipment and personnel needed to serve the community, with at least 18 sworn personnel on duty at all times. The CCFD utilizes a three-shift schedule, staffing each shift for a 24-hour period, seven days a week, and 365 days a year. Other facilities that serve the CCFD include the Community Risk Reduction and Fire Administration offices in City Hall, as well as a 4,965-square-foot Fire Drill Training Facility used for teaching firefighting techniques.[15] The City is divided into three fire districts, two rescue/ EMS districts, and 15 metropolitan fire management zones (FMZs), with the fire and rescue/EMS districts evenly distributed by population and centerline miles of

[13] City of Los Angeles, *A 2002 Proposition Q Citywide Safety Bond Program Progress Report*, February/March 2016.

[14] City of Culver City, *General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report*, July 2020, p. 26.

[15] City of Culver City, *General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report*, July 2020, p. 22.

roads served, and the FMZs defined by occupancies within a given geographical area that share common fire risk.[16]

As shown in **Figure 4.11.1-1**, *CCFD and LAFD Fire Stations in the Project Vicinity,* the Project Site is located within Fire District 1, FMZ 6, with first-in service to the Project Site provided by Fire Station 1, with Fire Stations 2 and 3 providing backup service.[17] FMZ 6, which covers approximately 0.22 square miles, is located in the eastern part of the City and has mostly single and multiple family residences, along with an industrial park. The Expo Light Rail Station is also within FMZ 6.[18] From 2014 to 2018, FMZ 6 had 8 fire incidents, 687 EMS incidents, 4 technical rescue incidents, 10 hazardous materials incidents, 4 wildland incidents, and 275 other incidents.

Table 4.11.1-3 provides information on the location, type of equipment/staffing, and the approximate distance/direction from the Project Site.

TABLE 4.11.1-3
CCFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station	Address	Driving Distance to Project Site	Apparatus	Staff
CCFD Fire Station 1 (Headquarters)	9600 Culver Boulevard	0.8 miles west of Project Site	Engine Company	Captain, engineer, firefighter
			Paramedic Resources	2 firefighter/ paramedics with ALS certification
			Battalion Chief Command Vehicle	Battalion chief
CCFD Fire Station 2	11252 Washington Boulevard	2.8 miles southwest of Project Site	Engine Company	Captain, engineer, firefighter
			Ambulance	2 EMTs
CCFD Fire Station 3	6030 Bristol Parkway	4.4 miles south of Project Site	Engine Company	Captain, engineer, firefighter
			Paramedic Resources	2 firefighter/ paramedics with ALS certification
			Truck Company	Captain, engineer, 2 firefighters

NOTES: BLS = advanced life support.

SOURCE: Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, pages 22 and 23.

Fire Station 1 has a service population of approximately 13,385 people,[19] and with 6 on-duty personnel, Fire District 1 has an existing on-duty firefighter to population ratio of 1: 2,231.[20] The existing on-duty firefighter to population ratio for the entire City is 1:2,000.[21]

16 CCFD, Community Risk Assessment: Standards of Cover, 2019, pp. 18 and 38.

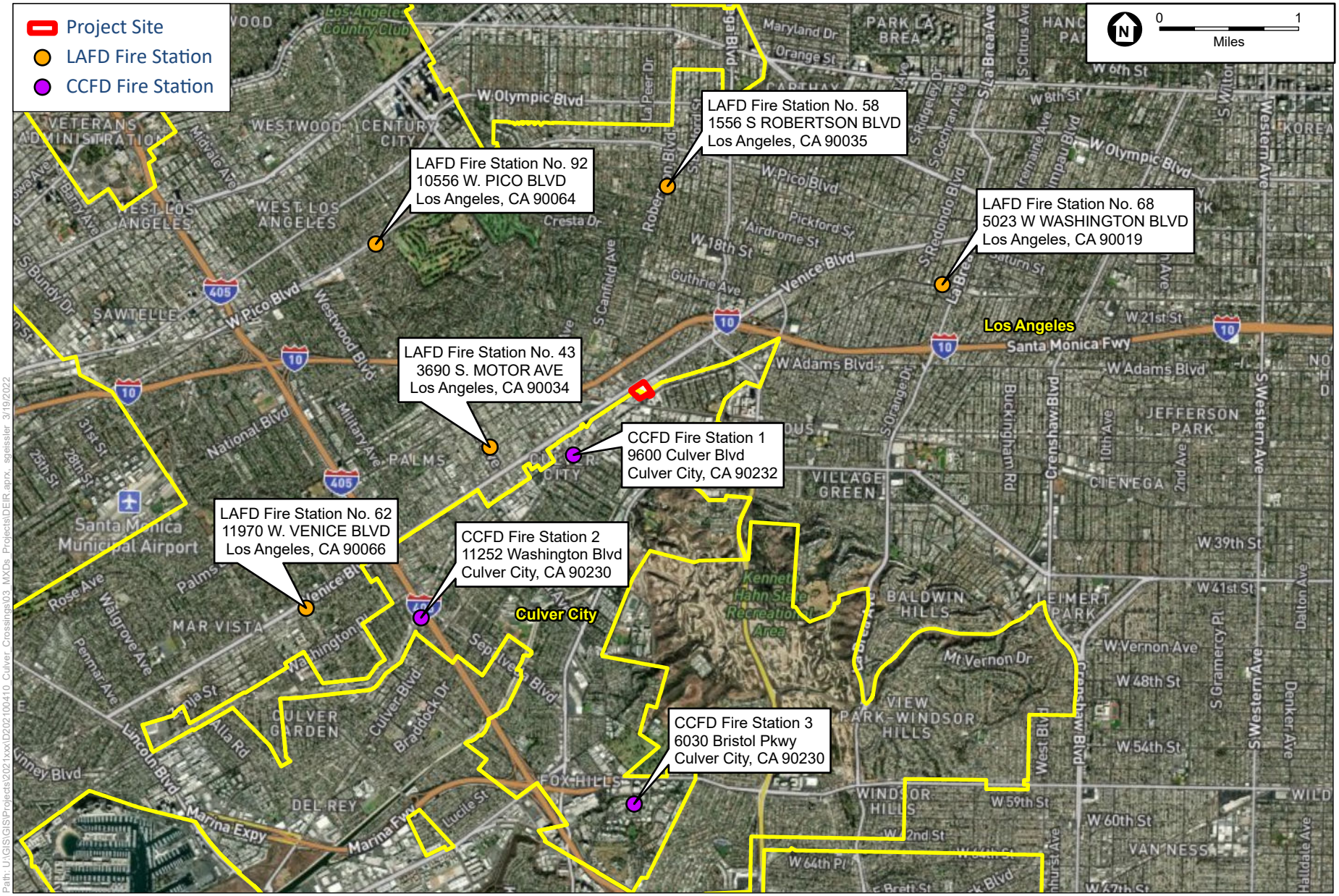
17 CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

18 CCFD, Community Risk Assessment: Standards of Cover, 2019, p. 146.

19 CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

20 With 6 on-duty personnel and a service population of 13,385 people, Fire District 1 would have 6 personnel: 13,385 people, which is approximately 1 personnel:2,231 people.

21 With 20 on-duty personnel based on Table 4.11.1-3 for all three fire stations and a total City population of 40,000 people, the City would have 20 personnel:40,000 people, which is 1 personnel:2,000 people.



SOURCE: Mapbox, 2021; City of Los Angeles Open Data: https://data.lacity.org/, Accessed March 2022; ESA 2022

Crossings Campus

Figure 4.11.1-1
CCFD and LAFD Fire Stations in the Project Vicinity

The CCFD Strategic Plan and the CRA, identified various improvements to increase CCFD performance regarding deployment, response time, data collection, and mutual aid. The CCFD plans to add a third rescue ambulance (2 staff) at Fire Station 2 and to augment employees by 7 additional staff.[22] The added rescue would support emergency medical responses throughout the City, including the Project Site, as needed.[23]

In 2018, the CCFD responded to a total of 6,791 incidents, including fire, rescue, hazardous materials, and others.[24] Based on these statistics, the CCFD had a 2018 Citywide fire/EMS incident to population ratio of 6,791 incidents per 40,000 persons, or approximately 170 incidents per 1,000 persons. The CCPD's response time standards differentiate between the type of an emergency response call (e.g., fire suppression, EMS, technical rescue, hazardous materials emergency response) and then by the type of risk (e.g., high, moderate, and low risk). The CCFD reports their response times based on the first due-in staff and the ERF. The first due-in staff is the first unit to arrive at the incident and has the responsibility of establishing command at the scene, evaluating the need for additional resources, and providing initial emergency response services. The ERF includes the total number of personnel necessary to address an emergency and/or terminate an incident.[25]

City of Los Angeles

Fire prevention, fire suppression, life safety, and emergency medical services within the City of Los Angeles are provided by the LAFD. The LAFD is a full-spectrum life safety agency that serves a population of approximately four million people. The LAFD's estimated 3,435 uniformed personnel and 381 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. Currently, there is an estimated total of 1,018 uniformed firefighters on-duty at 106 fire stations across the LAFD's 469-square-mile jurisdiction.[26]

The LAFD emergency services are divided across four geographic bureaus: Central, South, Valley, and West. The Project Site is located in LAFD's Operations South Bureau and is comprised of Battalions 6, 13, and 18. The Operations South Bureau encompasses the southern portion of Los Angeles.[27]

As shown in Figure 4.11.1-1, there are five fire stations that provide primary fire protection services to the Project Site and surrounding area. **Table 4.11.1-4,** *LAFD Fire Stations Located in the Vicinity*

[22] Culver City, *General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report*, July 2020, p. 29.

[23] CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

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

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

[26] Los Angeles Fire Department, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission. Accessed March 18, 2022.

[27] Los Angeles Fire Department, South Bureau, https://www.lafd.org/about/south-bureau. Accessed March 18, 2022.

of the Project Site, includes the location, distance/direction from the Project Site, equipment, and staffing for each of the fire stations.

TABLE 4.11.1-4
LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station	Address	Driving Distance to Project Site	Apparatus	Staff
LAFD Fire Station No. 43	3690 S. Motor Avenue	1.7 miles west of Project Site	Engine and Paramedic Rescue Ambulance	6
LAFD Fire Station No. 58	1556 S. Robertson Boulevard	2.0 miles northeast of Project Site	Assessment Engine, 2 Paramedic Rescue Ambulances and BLS Rescue Ambulance	10
LAFD Fire Station No. 68	5023 W. Washington Boulevard	2.36 miles east of Project Site	Engine and Paramedic Rescue Ambulance	7
LAFD Fire Station No. 92	10556 W. Pico Boulevard	3.3 miles northwest of Project Site	Assessment Light Force, Paramedic Rescue Ambulance and BLS Rescue Ambulance	10
LAFD Fire Station No. 62	11970 Venice Boulevard	3.3 miles west of Project Site	Assessment Engine, Paramedic Rescue Ambulance	6

NOTES: BLS = basic life support

SOURCE: LAFD, Fire Marshal Kristin Crowley, correspondence dated March 7, 2022. Provided in Appendix L of this Draft EIR.

As shown in Table 4.11.1-4, LAFD Fire Station No. 43 at 3690 S. Motor Avenue is located nearest to the Project Site, approximately 1.08 miles west of the Project Site. However, per the LAFD website, LAFD Fire Station No. 58 is the first due-in fire station for the Los Angeles Parcel.[28] LAFD Fire Station No. 58 is located at 1556 S. Robertson Boulevard and is approximately 1.50 miles northeast of the Project Site. The other three stations named by LAFD that would provide support for fire protection services to the Project Site are LAFD Fire Station Nos. 68, 92, and 62, located (by straight line distance) approximately 2.34 miles east, 2.11 miles northwest, and 2.83 miles west, respectively, of the Project Site. The closest fire station with an Engine Company is LAFD Fire Station No. 43; however, there are no identified LAFD Fire Stations with a Truck Company servicing the Project Site.

Response Times

Table 4.11.1-5, *CCFD Response Times,* shows the CCFD response time goals, for 90 percent of the time, and the five-year aggregate response times from 2014 to 2018.

Specific response times for the LAFD stations for January through December 2021 are included in **Table 4.11.1-6**. LAFD Fire Station No. 43, the closest station to the Project Site, had an average response time of 6 minutes,47 seconds and 6 minutes, 38 seconds for EMS and non-EMS incidents, respectively. LAFD Fire Station No. 58, the first due-in fire station for LAFD, had an average response time of 7 minutes, 4 seconds and 6 minutes, 56 seconds for EMS and non-EMS incidents,

[28] Los Angeles Fire Department, Find Your Station. https://www.lafd.org/fire-stations/station-results. Accessed March 21, 2022.

respectively. The Citywide average response times between January and December 2021 were 6 minutes, 55 seconds and 6 minutes, 33 seconds for EMS and non-EMS incidents, respectively.

TABLE 4.11.1-5
CCFD RESPONSE TIMES

Incident Type	CCFD Goal[a]	Aggregate 2014–2018 Response Time[b]
High Risk Fire Incident		
First Due-In Unit	7:00	10:16
ERF	14:00	N/A
Moderate Risk EMS Incident		
First Due-In Unit	6:20	8:10
ERF	9:50	10:26
Moderate Risk Technical Rescue Incidents		
First Due-In Unit	7:30	9:40
ERF	12:00	N/A
Moderate Risk Hazardous Materials Incident		
First Due-In Unit	8:00	10:02
ERF	9:00	N/A

NOTES: N/A = not applicable.

[a] CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

[b] CCFD, Community Risk Assessment: Standards of Cover 2019, pages 88 to 97.

TABLE 4.11.1-6
LAFD RESPONSE TIMES BY LAFD FIRE STATION

	Average Response Times[a,b]	
Fire Station	**EMS**	**Non-EMS**
LAFD Fire Station No. 43	6:47	6:38
LAFD Fire Station No. 58	7:04	6:56
LAFD Fire Station No. 68	6:47	6:32
LAFD Fire Station No. 92	7:45	7:02
LAFD Fire Station No. 62	7:24	7:06
Citywide average	6:55	6:33

NOTES:

[a] Average Response times from January through December of 2021 provide the most accurate annual average. Average Response Times include call processing, turn out, and travel time. The Citywide average response time from January through December 2021 is 6 minutes and 55 seconds for EMS and 6 minutes and 33 seconds for non-EMS.

[b] Non-EMS = Fire and other services. EMS = Emergency Medical Services.

SOURCE: Los Angeles Fire Department, FireStatLA, https://www.lafd.org/fsla/stations-map?year=2020. Accessed March 18, 2022.

The response times provided above are for information purposes since CCFD and LAFD have not established response time standards for emergency response nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression."[29] Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City of Los Angeles streets to aid in emergency response.[30] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[31]

Although response time is considered to assess the adequacy of fire protection services, it is one factor among several that are utilized by CCFD and LAFD in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the fire department's judgement for needs in an area. If the number of incidents in a given area increases, it is the CCFD's or LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling, the Cities of Culver City and Los Angeles have and will continue to meet their legal obligations to provide adequate public safety services, including fire protection.

Emergency Access

The Project Site is located within an urbanized area that has a fully developed roadway system. Emergency access to the Project vicinity is provided by several arterials including Venice Boulevard, National Boulevard, and Washington Boulevard, and direct emergency access to the Project Site is provided by each of these three streets.

CCFD Fire Station 1, the first due-in CCFD fire station, includes an Engine Company and has access to the Project Site from the west directly from Washington Boulevard. LAFD Fire Station No. 58, the first due-in LAFD fire station, includes an Assessment Engine and has access to the Project Site from Robertson Boulevard to National Boulevard.

Fire Water Infrastructure/Fire Flow for Firefighting Services

Fire flow to the Project Site is currently provided by an 8-inch water line in Venice Boulevard, and a 6-inch water line on National Boulevard. The connection to the water system in the portion of the Project Site located in Culver City, which is provided by Golden State Water Company (GSWC), is located at the southwest corner of the Project Site where laterals go from an 8-inch water line in National Boulevard to a 16-inch water line in Washington Boulevard. For the portion of the Project

[29] National Fire Protection Association (NFPA), NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.

[30] Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

[31] Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

Site located in Los Angeles, water is provided by the Los Angeles Department of Water and Power (LADWP), and the connection to the water system occurs at the northwest corner of Venice Boulevard and National Boulevard. Existing fire hydrants are also present around the Project boundary. Specifically, four fire hydrants are located on Venice Boulevard (two fire hydrants are located on the northern side of Venice Boulevard and two fire hydrants are located on the southern side of Venice Boulevard); and two fire hydrants are located on the western side of National Boulevard. Both GSWC and LADWP provided a will-serve letter and fire flow test results confirming that water service would be available for the Project (refer to Appendix P of this Draft EIR).

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

Fire Hazard Area

The Project Site is in a highly urbanized area and is not located within an area designated by CAL FIRE, CCFD, or LAFD as a Very High Fire Hazard Severity Zone (VHFHSZ).[32] VHFHSZs are primarily located in the hilly and mountainous regions of the City of Culver City and City of Los Angeles where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development and vice versa. The nearest very high fire hazard severity zone (VHFHSZ) is located approximately 0.65 miles south of the Project Site near the Baldwin Hills. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands or high fire hazard zones.

4.11.1.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to fire protection services if it would:

- **FIRE-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Methodology

Project effects on fire protection services are evaluated by CCFD and LAFD on a project-by-project basis. A project's land use designation, project size and components fire-related needs including fire flow and fire hydrant sizing, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into

[32] CAL FIRE, California Fire Hazard Severity Zone Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed March 18, 2022.

consideration. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station, or expansion, relocation, or consolidation of an existing facility, to accommodate increased demand. Consultation with CCFD and LAFD is also conducted to determine a project's effects on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact but, rather, a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact needs to be assessed with mitigation measures provided if the impact is determined to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is a reasonably foreseeable direct or indirect effect of the project.

Based on input received of CCFD and LAFD, there are no current capital improvement plans for the construction or expansion of fire facilities in the local vicinity of the Project Site in either the City of Culver City or the City of Los Angeles. Therefore, based on historical development of fire and emergency facilities, it is assumed that in the event Culver City or the City of Los Angeles determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration.

In regard to fire hydrant flow, GSWC and LADWP performed a hydraulic analysis of their respective water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site.

Project Design Features

The Project would incorporate Fire Code requirements, including those summarized in the letters from CCFD and LAFD included in Appendix L of this Draft EIR. No specific project design features are proposed with regard to fire protection. However, as discussed in Section 4.12, *Transportation,* of this Draft EIR, pursuant to Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan that would include measures to ensure emergency access to the Project Site and adjacent properties. Project Design Feature TRAF-PDF-1 would minimize impacts to vehicular and other forms of circulation during construction.

Analysis of Project Impacts

Threshold FIRE-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Impact Analysis

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. The Culver City Parcel is located 0.62 miles from CCFD Fire Station 1, the first due-in fire station for CCFD. With regard to the Los Angeles Parcel, the first due-in fire station identified for LAFD is LAFD Fire Station No. 58, located 1.50 miles northeast of Los Angeles Parcel. The nearest LAFD fire station to the Project Site is LAFD Fire Station No. 43, located approximately 1.08 miles west of the Los Angeles Parcel.

CCFD Fire Station 1 includes an engine company, paramedic resources, and battalion chief command vehicle. LAFD Fire Station No. 58 includes an assessment engine, two paramedic rescue ambulances, and basic life support (BLS) rescue ambulance. Average response times for a high-risk fire incident for first due-in stations in CCFD is 10 minutes, 16 seconds, and the specific average response time for all EMS services for LAFD Fire Station No. 58 is 7 minutes, 4 seconds. The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC. Furthermore, Project construction activities would be short-term and temporary.

Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 CFR Part 1926, as discussed further above in Section 4.11.1.2, *Environmental Setting*. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing CCFD and LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction could, if approved by the City of Culver City or the City of Los Angeles, encroach into the public rights-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Venice Boulevard, National Boulevard, and Washington Boulevard. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would not be impeded. In addition, a Construction Management Plan will be implemented during Project construction pursuant to Project Design Feature TRAF-PDF-1 set forth in Section 4.12, *Transportation*, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during

construction activities. Specifically, Project Design Feature TRAF-PDF-1 requires the provision of an emergency access plan as well as review and approval of any proposed lane closures include coordination with the fire and police departments of each city to minimize potential effects on traffic flow and emergency response. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access. However, with implementation of Project Design Feature TRAF-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter a.m. and p.m. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators) would also be implemented, as necessary, to ensure emergency access to the Project Site. Traffic control measures would also ensure that traffic flow is maintained on adjacent rights-of-way and would also minimize response times. Furthermore, pursuant to Section 21806 of the CVC, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic to respond to emergencies in a timely manner.

Based on the above, construction of the Project would not result in the need for a new fire station or the expansion of an existing facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

Fire Protection Facilities and Services

As described in Chapter 2, *Project Description*, the Project would introduce 2,400 employees to the Project Site as well as visitors, which would increase the demand for fire protection from the CCFD and LAFD compared to existing conditions. As there are no proposed residential uses, the Project would only contribute to increasing the number of daytime non-resident populations (visitors and employees). The Project Site would continue to be served by both CCFD and LAFD. Generally, calls for fire service from Building 1, within Culver City, would primarily be dispatched to CCFD, while calls from Building 2 would be dispatched to LAFD. However, the responding dispatcher would have discretion to have the CCFD and/or LAFD respond to service calls based on the nature of the call (i.e., emergency vs. non-emergency) in consideration of available units in proximity to the Project Site and anticipated response time.

As previously described, the Project Site is located 0.62 miles from CCFD Fire Station 1, the first due-in fire station for CCFD. With regard to the City of Los Angeles, the first due-in fire station is LAFD Fire Station No. 58, located 1.50 miles northeast of Los Angeles Parcel. The nearest LAFD fire station to the Project Site is LAFD Fire Station No. 43, located approximately 1.08 miles west of the Los Angeles Parcel. Back up response would be provided by CCFD Fire Station 2 and CCFD

Fire Station 3 for the Culver City Parcel, and LAFD Fire Station No. 68, LAFD Fire Station No. 92, and LAFD Fire Station No. 62 for the Los Angeles Parcel.

As required by the CCMC, Building 1 would be required to install an automatic fire sprinkler system. With regard to Building 2, LAMC Section 57.507.3.3 provides for the following response distances, which, if exceeded, require the installation of an automatic fire sprinklers system: one mile for an Engine Company and 1.5 miles from a Truck Company for a high-density residential and commercial development. The identified first due-in LAFD fire station (LAFD Fire Station No. 58) does not include an Engine Company or Truck Company. LAFD Fire Station No. 43 is the closest fire station with an Engine Company; however, the distance to the Project Site exceeds the 1-mile threshold outline in the LAMC. In addition, no LAFD Fire Stations in the vicinity of the Project Site include a Truck Company. As such, no LAFD Fire Stations in the vicinity of the Los Angeles Parcel would meet either distance standards for an Engine Company or Truck Company and automatic fire sprinklers would be required within Building 2, which would adequately address the response distance from existing stations per LAMC Section 57.512.2. Therefore, Building 2 would also be required to install an automatic fire sprinkler system.

As discussed in Chapter 2, *Project Description*, of this Draft EIR, the Project would replace the existing uses on the Project Site with two four- to five-story buildings that would provide a total of 536,000 square feet (sf) of new office floor area, which would result in an increase of 2,400 employees, as compared to the existing uses. Thus, the Project would increase intensity of the Project Site and increase the demand for fire protection services compared to existing conditions.

The Project would comply with the applicable OSHA, Building Code, Fire Code, and other CCMC, LAMC, CCFD, and LAFD requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, and manual smoke evacuation systems in the underground parking structure on the Culver City Parcel; installation of Knox Boxes; provision of fire resistant doors, materials, walkways, stairwells, elevator systems (including emergency and fire control elevators), smoke detectors, and signage, among other fire prevention features. For Building 1, CCFD indicated that due to the layout of the proposed building in relation to Building 2 on the Project Site, a joint site plan review between CCFD and LAFD would be required for Building 1. For Building 2, compliance with applicable LAMC requirements and recommendations would be demonstrated as part of a fire/life safety plan review and a fire/life safety inspection performed by LAFD for new construction projects, as set forth in LAMC Section 57.118, as required prior to the issuance of a building permit.

The Project would also generate revenues to the City of Culver City and City of Los Angeles (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by each City.

Lastly, based on the analysis and the constitutional requirement started in the California Constitution Article XIII, Section 35(a)(2) to provide these services, and the *Hayward* ruling, it is reasonable to conclude that: (1) Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; (2) such services will be provided by a local jurisdiction; and (3) the Project would not

inhibit CCFD or LAFD emergency response. Also, as indicated previously, it is assumed that in the event Culver City or the City of Los Angeles determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration.

Compliance with applicable regulatory requirements and recommendations would ensure that adequate fire prevention features are provided that would reduce the demand on CCFD and LAFD facilities and services without creating the need for new or expanded fire facilities.

Response Distance and Emergency Access

CCFD does not have a required response distance. All new buildings, including Building 1 on the Culver City Parcel, would be required to install an automatic fire sprinkler system. As previously discussed, LAFD Fire Station No. 58, the first-due in fire station to respond to an emergency on the Los Angeles Parcel, and LAFD Fire Station No. 43, which would provide back-up response to the Project Site, do not meet either distance standards for an Engine Company or Truck Company; therefore, the installation of automatic fire sprinklers would be required. The installation of fire sprinklers in the proposed buildings serve to provide a quick reaction to a building fire that reduce the risk of death or injury from a fire because they dramatically reduce heat, flames, and smoke, allowing building occupants time to evacuate before the fire protection services arrive.

As described in Chapter 2, *Project Description*, of this Draft EIR, vehicular access to the new below-grade parking, as well as loading docks and trash areas, would be provided via two primary driveways: one located at the southern edge of the Project Site on National Boulevard serving Building 1, and one located on the eastern edge of the Project Site on Venice Boulevard serving Building 2. Both driveways would provide right-turn only ingress and right-turn only egress. A third, secondary driveway from Washington Boulevard would provide right-turn ingress for employee vehicles and emergency vehicles to the Culver City and Los Angeles Parcels. Emergency access would also be provided from Venice Boulevard, National Boulevard, and Washington Boulevard. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards), but does include the installations of fencing and gates at the edge of the publicly accessible, privately maintained amenity area located in the southeast corner of the Project Site. As part of the site plan review, the fencing and gate material and type would be reviewed and approved by CCFD to ensure that emergency vehicle access to the Project Site would not be impeded. As such, emergency access to the Project Site would be adequately maintained.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of primary and secondary arterials, and collector and local streets that provide regional, sub-regional, and local access and circulation within the local Project vicinity. The Project Site is located within a highly urbanized area of both the City of Culver City and the City of Los Angeles, and the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, emergency response is

routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC, and multiple station response. Furthermore, because of the grid-like pattern of the local street system, each of the fire stations that serve the Project Site have multiple routes available to respond to emergency calls at the Project Site. Additionally, the Project's driveways and internal circulation would be designed to incorporate applicable CCMC and LAMC requirements regarding Project Site access, including providing for adequate emergency vehicle access. For Building 1, CCFD indicated that due to the layout of the proposed building in relation to Building 2 on the Project Site, a joint site plan review would be required for Building 1. For Building 2, compliance with applicable LAMC requirements and recommendations would be confirmed as part of a fire/life safety plan review and a fire/life safety inspection performed by LAFD, as set forth in LAMC Section 57.118, as required prior to issuance of a building permit. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair CCFD or LAFD from responding to emergencies at the Project Site or the surrounding area.

Fire-Flow and Demand

Based on correspondence from CCFD, Building 1 on the Culver City Parcel has a minimum fire flow requirement of 2,250 gpm at 20 psi residual for a duration of 2 hours, in compliance with the CCMC Section 9.02.[33] In addition, the LAFD has determined that the required fire-flow for Building 2 on the Los Angeles Parcel, which falls within the industrial and commercial category, would be from 6,000 to 9,000 gpm (total) from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 psi.[34]

An Information on Fire Flow Availably Request (IFFAR) was requested from GSWC to confirm adequate fire flow pressure for Building 1 on the Culver City Parcel from the existing infrastructure. Two fire hydrants located on National Boulevard were tested and the results, as provided in Appendix P of this Draft EIR, indicate that the fire hydrants can provide 6,828 gpm at 20 psi for a duration of 2 hours. Based on the results, GSWC determined that the Project fire hydrant flow needs can be supplied by existing infrastructure.

An IFFAR was requested from LADWP to confirm adequate fire flow pressure for Building 2 on the Los Angeles Parcel from the existing infrastructure. The results indicate that the existing infrastructure can produce a combined flow rate of 3,600 gpm. The fire hydrants listed in the IFFAR from LADWP are not expected to be the only sources of fire flow to the Project Site. Fire hydrants located within Culver City limits are operated by GSWC would be available for the fire suppression in the event of an emergency. The available flow from these can be combined with the total from the LADWP fire hydrants to provide the required fire flow demand of 6,000 to 9,000 gpm. As indicated above, the fire hydrants located within Culver City can provide 6,828 gpm at 20 psi for a duration of 2 hours. When combined with the four fire hydrants within the City of Los Angeles,

[33] CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

[34] LAFD, Fire Marshal Kristin Crowley, correspondence dated March 7, 2022. Provided in Appendix L of this Draft EIR.

the total fire flow that be supplied to the Project Site is 10,428, surpassing the required 6,000–9,000 gpm required by LAFD.

The Project would be designed to comply with applicable regulatory requirements from the CCMC and LAMC. At the time of site-plan review, should CCFD or LAFD determine additional hydrants or a higher gpm is required, the Project would install additional hydrants or improve the public water system, as necessary.

Conclusion

Based on the above, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant.

Mitigation Measures

Impacts regarding fire protection services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Impacts to CCFD and LAFD services and facilities for each of the related projects would be addressed as part of each related project's development review process conducted by the City of Culver City and City of Los Angeles, as applicable. Each related project would be subject to the lead agency's routine permitting process, which may include a review by the CCFD or LAFD to ensure that sufficient measures are implemented to reduce potential impacts to fire protection services.

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 52 related projects (34 in the City of Culver City and 18 in the City of Los Angeles). The related projects are located within the fire station service areas of the same CCFD and LAFD fire stations that would serve the Project Site (i.e., CCFD Fire Station 1, CCFD Fire Station 2, CCFD Fire Station 3 and LAFD Fire Station No. 43, LAFD Fire Station No. 58, LAFD Fire Station No. 68, LAFD Fire Station No. 92, and LAFD Fire Station No. 62).

Construction

As with the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions, in combustible materials and coatings, and lighted cigarettes. However, similar to the Project,

construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the safety and health regulations for construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan (refer to Project Design Feature TRAF-PDF-1), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. Since the Project would not require substantial narrowing of adjacent public rights-of-ways that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Each related project would implement similar design features during construction and would be subject to the applicable lead agency's routine construction permitting process. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact CCFD or LAFD response times within the Project Site vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to Section 21806 of the CVC. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

Operation

Similar and in addition to the Project, the increase in development, which includes an increase of 3,655 dwelling units, 165,136 sf of commercial uses, 1,906,239 sf of office uses, 19,054 students, and 189,212 sf of other services, and service population from these related projects would generate the need for additional fire protection and emergency services from the fire stations identified above.

The development of the Project and the related projects may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities. With regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable CCMC and LAMC requirements would ensure that adequate fire prevention features would be provided and reduce demand on CCFD and LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the CCFD and LAFD facilities and equipment.

The Project, as well as the related projects, would also generate revenues to the City of Culver City and City of Los Angeles (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by

each City. Furthermore, over time, CCFD and LAFD would continue to monitor population growth and land development throughout their respective jurisdictions and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

In accordance with CCMC Section 9.02.040, all related projects within Culver City would be required to include installation of an automatic sprinkler system, regardless of area separation or type of construction. With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with LAMC requirements, if a related project would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, the related projects would be required to comply with all applicable CCMC and LAMC requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable CCMC and LAMC requirements would be demonstrated as part of a site plan review.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the City of Culver City and City of Los Angeles. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and mitigation measures, as applicable, that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the CCFD or LAFD from responding to emergencies at the Project Site or the surrounding area.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection service is the responsibility of a City. Through the regular budgeting efforts for either the City of Culver City or City of Los Angeles, CCFD and LAFD resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time, as appropriate. At this time, neither CCFD nor LAFD have identified that it will be constructing a new station in the area impacted by this Project due to projects in the service area. As discussed above, CCFD did indicate that it plans to add a third rescue ambulance (2 staff) at Fire Station 2 and to augment employees by 7 additional staff.[35] If CCFD or LAFD determine that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be expected to

[35] Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, p. 29.

be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size (such as the five stations identified as serving the Project Site), and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location for a new fire station or expansion or alteration of the existing fire stations which would service the Project Site and the related projects' sites, would be speculative and, therefore, beyond the scope of this Draft EIR.

Conclusion

Based on the above, the Project's contribution to cumulative impacts associated with the provision of new or physically altered fire facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts to fire protection services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts to fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.11.2 Police Protection

4.11.2.1 Introduction

This section analyzes whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Culver City Police Department (CCPD) and Los Angeles Police Department (LAPD) dated February 14, 2022, and March 13, 2022, respectively, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix L of this Draft EIR. Additional information included in this analysis is also based on information provided on CCPD and LAPD's website, the LAPD crime control model computer statistics (COMPSTAT) database, and other published sources.

4.11.2.2 Environmental Setting

Regulatory Framework

There are several plans, policies, and programs regarding Police Protection at the state, regional, and local levels. Described below, these include:

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management
- Culver City General Plan
- Culver City Municipal Code
- Los Angeles General Plan Framework Element
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles Administrative and Municipal Codes
- Los Angeles Charter
- Los Angeles Police Department Computer Statistics Unit Program
- Los Angeles Police Department Guidelines and Plan Review

State

California Vehicle Code, Section 21806

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.[1] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety ... (c) All pedestrian upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

[1] A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

Regional

County of Los Angeles Office of Emergency Management

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.[2]

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

Local

City of Culver City

Culver City General Plan

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

Culver City Municipal Code

The Culver City Municipal Code (CCMC) contains the City's regulations and ordinances, which include general and traffic regulations enforced by the appropriate City departments, including, but not limited to, the CCPD, the Community Development Department (Enforcement Services and Building Divisions) and the Public Works Department (Environmental Programs and Operations Division).

Sections of the CCMC applicable to police protection services at the Project Site include, but are not limited to, the following:

Section 9.08.385 (Authority to Close Streets): This section requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work.

Section 17.540 (Site Plan Review): This section provides procedures and standards for the comprehensive review of proposed development projects to: ensure compliance with the required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial, and public areas of the City. As such, this section may require new projects to be reviewed by the CCPD to ensure that public safety and site security measures are incorporated.

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

[2] County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf. Accessed March 24, 2022.

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

Section 11.04.030 (Suspension or Revocation of an Alarm Permit): This section allows the City to access services charges to property owners for each false alarm that results in a CCPD response in excess of three false alarms in a 12-month period.

Section 11.04.065 (Police Chief Discretion): This section states that the Chief of Police shall have discretion to enforce rules, regulations, policies, procedures and directives necessary to implement the provisions of Chapter 11.04, Alarm Systems. Such powers shall include, but are not limited to, the power to promulgate, execute and enforce a policy regarding dispatch of police to alarm signals, as well as the discretion to discontinue police response to alarm signals due to the user's failure to comply with the provisions of Chapter 11.04, or to properly repair alarm systems deemed to constitute runaway alarms.

City of Los Angeles

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the city and guides subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs.

Relevant goals, objectives, and policies of the Framework Element are provided in **Table 4.11.2-1**, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies*. Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined below in Table 4.11.2-1. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

TABLE 4.11.2-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC SERVICE GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 9I	Every neighborhood in the city has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. With regard to police protection, the West Adams–Baldwin Hills–Leimert Community Plan includes the following policies:

> **CF1-1: Evaluate Land Use Impacts on Police Service Demand.** Coordinate with LAPD as part of the review of significant development projects and/or General Plan amendments affecting land use to determine the impact on service demands.
>
> **CF3-2: Adequate Neighborhood Level Police Protection.** Maintain and promote the establishment of police facilities and service adequate to protect the Community Plan Area at the neighborhood level.

Los Angeles Administrative and Municipal Codes

Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code for the training of police dispatchers. Los Angeles Municipal Code (LAMC) Chapter 5 includes regulations, enforceable by the police, related to firearms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the Los Angeles Fire Department (LAFD) in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures in regard to new development.

Los Angeles Charter

The City Charter at Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

Los Angeles Police Department Computer Statistics Unit Program

The LAPD Computer Statistics Unit (COMPSTAT) Program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.[3]

Los Angeles Police Department Guidelines and Plan Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

Provide on-site security personnel whose duties shall include but not be limited to the following:

- Monitoring entrances and exits;
- Managing and monitoring fire/life/safety systems;
- Controlling and monitoring activities in parking facilities;
- Install industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;

[3] LAPD, COMPSTAT, https://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/. Accessed March 24, 2022.

- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

Existing Conditions

City of Culver City

Police protection for the Culver City Parcel is provided by the CCPD. The CCPD is responsible for providing visible patrol, preliminary criminal investigations, follow-up investigations, traffic accident investigations, and specialized investigations of crimes such as identify theft, vice offenses, and similar crimes. The CCPD promotes community safety through deterrence and prevention of crime, apprehension of offenders, and education of the public in self-protective measures to minimize victimization. Additionally, the CCPD collaborates with regional partners and the Los Angeles County Sheriff's Department (LASD), when needed, for large scale police-related emergencies, and along with several other local cities, contracts with the South Bay Regional Public Communications Authority for dispatch services.

The CCPD is staffed with two full time K-9 units, an Emergency Response Team (ERT), a Crisis Response Team (CRT), a Mental Health Evaluation Team (MET), and a Partnership in Policing Team (PIP). In addition, the CCPD provides neighborhood and business watch programs to prevent criminal activities, which involve the PIP team. Crime patterns are routinely analyzed and dispersed to patrol officers and special crime suppression units. Monthly reports are prepared and made public that identify monthly statistics and information related to crime and arrests, staffing, parking and traffic citations and traffic collisions.

The CCPD has 109 sworn officers and 50 professional staff that serve an area of approximately five square miles with a residential (nighttime) population of approximately 40,000, and a daytime population of 300,000+.[4,5] The CCPD also has 14 reserve police officers and 19 volunteers in patrol.[6] Based on the number of sworn officers provided by CCPD correspondence, the City has an officer to daytime population ratio of approximately 1:2,752 and a nighttime officer to population ratio of approximately 1:367.[7] **Table 4.11.2-2,** *CCPD Population, Officer, and Crime Comparison (2021)*, provides a summary of the population, sworn officers, officer to population

[4] Daytime population is the number of people in a city during the day, including commuters and tourists. Nighttime population is the number of people who live in a city, typically residents.

[5] CCPD, Assistant Chief of Police Jason Sims, correspondence dated February 14, 2022. Provided in Appendix L of this Draft EIR.

[6] CCPD, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD. Accessed March 30, 2022.

[7] The daytime ratio was calculated by taking the 300,000 daytime population and dividing by 109 sworn officers. The nighttime ratio was calculated by taking the 40,000 nighttime population and dividing by 109 sworn officers.

ratio, annual report crimes, and crimes per 1,000 population for both the daytime population and the residential (nighttime) population.

TABLE 4.11.2-2
CCPD POPULATION, OFFICER, AND CRIME COMPARISON (2021)

	Population	Sworn Officers	Officers/ Population Ratio	Annual Reported Crimes	Crimes per 1,000 Population
Daytime Population	300,000+	109	1/2,752a	2,130b	7.1c
Residential (nighttime) Population	40,000	109	1/367d	2,130b	53.3e

NOTES:

a 300,000+ daytime population/109 officers = 2,752 residents/1 officer.
b Crime data is provided for 2021 (the latest whole year for which annual crime data was available).
c 2,130 crimes/ 300,000 daytime population = 0.0071 x 1,000 = 7.1 crimes per 1,000 daytime population.
d 40,000 residential (nighttime) population/109 officers = 367 residents/1 officer.
e 2,130 crimes/40,000 residents = 0.0533 X 1,000 = 53.3 crimes per 1,000 residents.

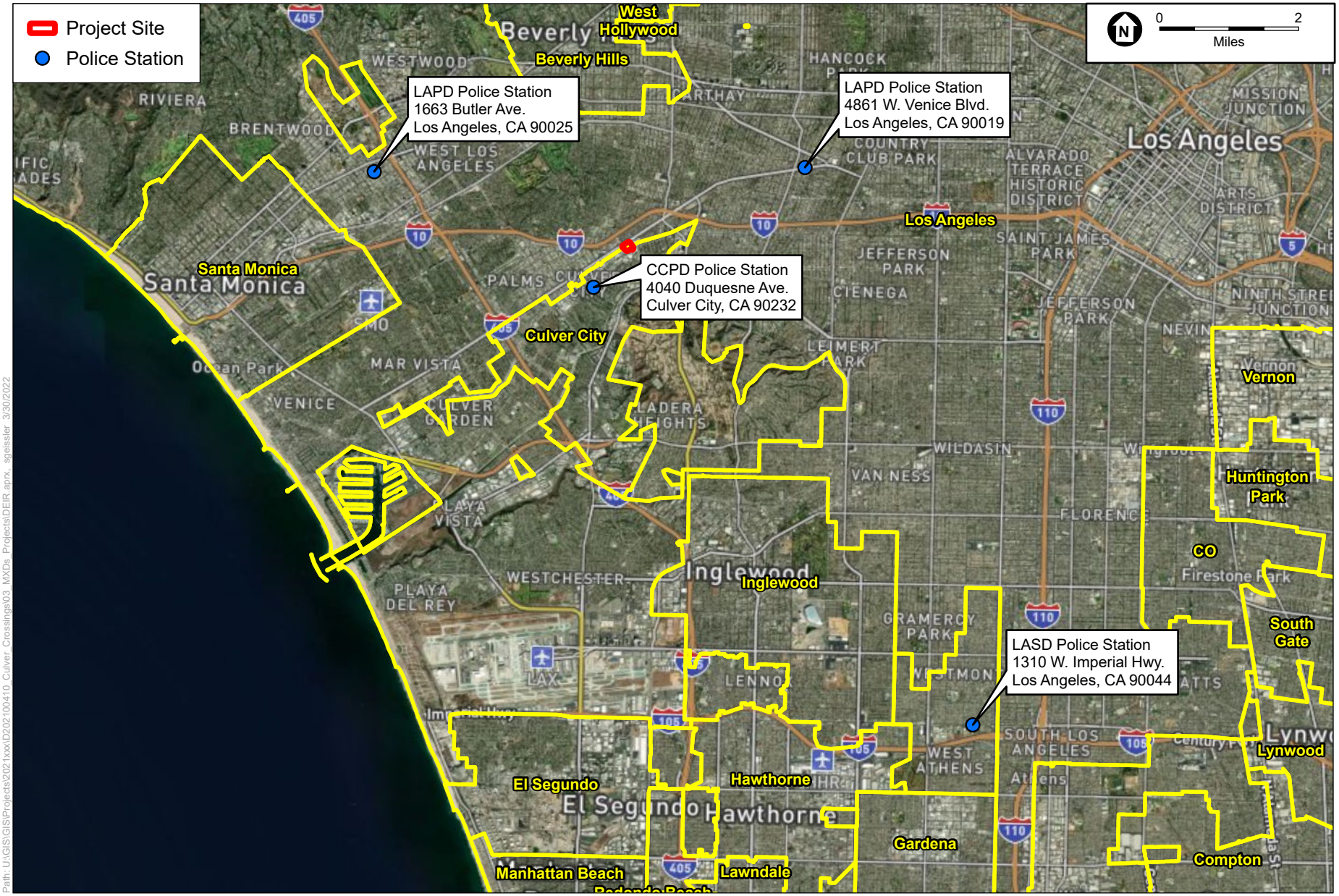
SOURCE: ESA, 2022.

The CCPD is divided into five patrol districts. The most current average response time documented in the CCPD December 2021 monthly report was 4 minutes and 10 seconds for emergency calls and 9 minutes and 42 seconds for non-emergency calls.[8]

As indicated in **Figure 4.11.2-1**, *Police Stations in the Project Vicinity*, the CCPD is located at 4040 Duquesne Avenue, approximately 0.7 miles northeast of the Project Site. The closest LASD station is located at 1310 West Imperial Highway in Los Angeles, approximately 8.5 miles southeast of the Project Site. Additionally, the Project Site is located within CCPD Patrol District 1, which covers the northeastern portion of the City of Culver City.[9]

Table 4.11.2-3, *Culver City 2021 Crime Statistics*, identifies crimes reported in the City in 2021 (the latest annual crime statistics). The crime statistics are based on the National Incident-Based Report System (NIBRS). As of January 1, 2021, the Federal Bureau of Investigation (FBI) made the nationwide implementation of NIBRS a top priority to provide a more useful statistics to promote constructive discussion, measures, and informed policing.

8 CCPD, December 2021 Monthly Report.
9 CCPD, Patrol, https://www.culvercitypd.org/Bureau-Information/Patrol-Bureau/Patrol. Accessed March 30, 2022.



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SOURCE: Mapbox, 2021; City of Los Angeles Open Data: https://data.lacity.org/, Accessed March 2022; ESA 2022

Crossings Campus

Figure 4.11.2-1
Police Stations in the Project Vicinity

TABLE 4.11.2-3
CULVER CITY 2021 CRIME STATISTICS

Crime Type	Number	Percent of Culver City Crime[a]
Murder	0	0%
Homicide	0	0%
Rape/Sexual Assault	30	1%
Aggravated Assault	149	7%
Simple Assault	172	8%
Kidnapping	7	0%
Human Trafficking	0	0%
Robbery	100	5%
Total Violent Crime	*458*	
Burglary	299	14%
Larceny/Theft	1,113	52%
Motor Vehicle Theft	252	12%
Arson	8	0%
Total Property Crime	*1,672*	
Total	**2,130**	

[a] Percentages are rounded.
SOURCE: CCPD, December 2021 Monthly Recap.

As indicated in Table 4.11.2-3, a total of 2,130 violent and property crimes were reported in the City of Culver City in 2021. No homicides were reported in the city in 2021. It should be noted that in 2021, 1,672 (or approximately 78 percent) of the reported crimes were property crimes (burglary, larceny/theft, motor vehicle theft, and arson), compared to the 458 (or approximately 22 percent) reported violent crimes (assault, kidnapping, robbery, etc.). Based on these numbers, and as shown above under Table 4.11.2-2, the City of Culver City has an existing annual crime rate of approximately 7.1 crimes per 1,000 daytime population of 300,000+ people. In addition, as also shown in Table 4.11.2-2, based on a residential (nighttime) population of approximately 40,000, the City of Culver City has an existing annual crime rate of approximately 53.3 crimes per 1,000 residential (nighttime) population.

City of Los Angeles

The LAPD provides police protection services in the City of Los Angeles, covering approximately 472.93 square miles and includes 21 community police service areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. Each bureau is further defined by divisions and into reporting districts. The LAPD also has a variety of specialized units including Special Weapons and Tactics (SWAT), Off-Road Enforcement, Mounted Unit, Special Operations Support Division, Air Support Division, Art Theft Detail, K-9 Unit, Animal Cruelty Task Force, Gangs and Narcotics Division, and Specialized Enforcement Section (Motors and Commercial Enforcement).

As of March 26, 2022, the departmental staffing resources within the LAPD include 9,426 sworn officers.[10] Based on a total City population of 4,015,546, the LAPD currently has an officer-to-resident ratio of 2.3 officers for every 1,000 residents.[11]

The Project Site is located within the jurisdiction of the West Bureau, West Los Angeles Division, of the LAPD. The West Bureau covers approximately 124 square miles with a population of approximately 840,400 residents, and overseas operations in the communities of Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The West Traffic Division is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau. The West Bureau overseas operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station. The West Los Angeles Community Police Station, which is the nearest to the Project Site, serves the Project Site and is described in more detail below.

The West Los Angeles Community Police Station is located at 1663 Butler Avenue, approximately 3.75 miles northwest of the Project Site, as shown in Figure 4.11.2-1. The West Los Angeles Community Police Station's boundaries encompass 65.14 square miles and includes the communities of Bel Air, Benedict Canyon, Beverly Crest, Beverly Glen, Beverlywood, Brentwood, Century City, Cheviot Hills, Crestview, Glen Ridge, Pacific Palisades, Rancho Park, Roscomare Valley, Rustic Canyon, San Vicente, Sawtelle, West Los Angeles, Westwood, La Cienega Heights, and Santa Monica Canyon.[12] The Project Site is located within Reporting District 0899, which includes the boundaries of National Boulevard to the west; the I-10 Freeway to the north, La Cienega Boulevard to the east, and the City Boundary to the south.

The West Los Angeles Community Police Station has approximately 251 sworn personnel and 11 civilian support staff that serve a population of approximately 228,000 persons.[13] The officer to resident ratio is one officer to every 951.1 residents (1:951). Additionally, there are special service teams (i.e., Air Support, Detectives, K9, and Metro/SWAT) available within the LAPD to service the West Los Angeles Community Area to support any additional policing needs.

In the event a situation arises requiring increased staffing, additional officers can be called in from other LAPD area police stations (the other closest stations within the West Bureau being the Pacific Community Police Station and the Wilshire Los Angeles Community Police Station).[14] As with all municipal police departments in Los Angeles County, the LAPD also participates in the Mutual Aid Operations Plan for Los Angeles County (refer to further discussion provided, above). The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies to provide police

10 LAPD, COMPSTAT Citywide Profile 02/27/22–03/26/22.

11 LAPD, COMPSTAT Citywide Profile 02/27/22–03/26/22.

12 LAPD, West Los Angeles Community Police Station, https://www.lapdonline.org/lapd-contact/west-bureau/west-los-angeles-community-police-station/. Accessed March 30, 2022.

13 LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022. Provided in Appendix L of this Draft EIR.

14 LAPD, Operations – West Bureau. Prepared by LAPD/PRD/GIS MAPPING January 2009.

personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril.

The emergency response system of the West Los Angeles Community Police Station is directly linked to the LAPD Communication Dispatch Center. The Communication Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which 911 emergency calls for service are received (includes police, fire, and paramedic). According to the LAPD, the average response time to emergency (high priority or Code 3) calls for service in the West Los Angeles Community Area is 6.2 minutes. The average response time to medium high priority (Code 2) calls for service was 16.7 minutes and the average response time for low priority, non-emergency calls for service in the West Los Angeles Community Area is 34.7 minutes. These response times were taken from the statistics submitted by the West Los Angeles Division for the four-week period between March 19, 2022, through April 9, 2022.

Currently, the LAPD operates under a COMPSTAT Plus program that implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model.

Table 4.11.2-4, *LAPD Population, Officer, and Crime Comparison (2021)*, lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Los Angeles Community Area and Citywide for year 2021, the latest data available. As reported therein, the officer to resident population ratios within the Los Angeles Community Area and Citywide are 1:951 and 1:426, respectively, and the number of crimes per 1,000 residents within the West Los Angeles Community Area and Citywide is 25 and 30, respectively.[15]

Table 4.11.2-5, *LAPD West Los Angeles Community Area Crime Statistics (2021)*, summarizes the crime statistics for the West Los Angeles Community Area from 2021 (the latest whole year for which annual crime data is available). As indicated therein, crimes in the West Los Angeles Community Area totaled 5,644, with most of the crimes related to burglary theft from vehicle and personal/other theft. No homicides were reported in the in the West Los Angeles Community Area in 2021. It should be noted that in 2021, 5,105 (or approximately 90 percent) of the reported crimes were property crimes (burglary, larceny/theft, motor vehicle theft, and arson), compared to the 539 (or approximately 10 percent) reported violent crimes (assault, kidnapping, robbery, etc.).

[15] LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022. Provided in Appendix L of this Draft EIR.

TABLE 4.11.2-4
LAPD POPULATION, OFFICER, AND CRIME COMPARISON (2021)

Service Area	Square Miles	Resident Population	Sworn Officers	Officers/ Resident Ratio	Annual Reported Crimes	Crimes per 1,000 Residents
West Los Angeles Community Area	65.14[a]	228,000[b]	251[b]	1/951[b]	5,644[c]	25[d]
Citywide	472.93[a]	4,015,546[e]	9,426[e]	1/426[f]	120,168[b]	30[g]

NOTES:

[a] LAPD, West Los Angeles Community Police Station. Accessed March 30, 2022. https://www.lapdonline.org/lapd-contact/west-bureau/west-os-angeles-community-police-station/.

[b] LAPD Correspondence, dated March 13, 2022. Provided in Appendix L of this Draft EIR.

[c] Crime data is provided for 2021 (the latest whole year for which annual crime data was available).

[d] 5,644 crimes/ 228,000 residents = 0.025 x 1,000 = 25 crimes per 1,000 residents.

[e] LAPD, COMPSTAT Citywide Profile 02/27/22–03/26/22.

[f] 4,015,546 residents/9,426 officers = 426 residents/1 officer.

[g] 120,168 crimes/4,015,546 residents = 0.030 X 1,000 = 30 crimes per 1,000 residents.

SOURCE: ESA, 2022.

TABLE 4.11.2-5
LAPD WEST LOS ANGELES COMMUNITY AREA CRIME STATISTICS (2021)

Crime Type	Number	Percent of West Los Angeles Community Area Crime[a]
Homicide	0	0%
Rape	48	1%
Robbery	186	3%
Aggravated Assault	305	5%
Total Violent Crime	*539*	
Burglary	1,005	18%
Motor Vehicle Theft	730	13%
Burglary Theft from Vehicle	1,685	30%
Personal/Other Theft	1,685	30%
Total Property Crime	*5,105*	
Total	**5,644**	**100%**

[a] Percentages are rounded.

SOURCE: LAPD Correspondence, dated March 13, 2022. Provided in Appendix L of this Draft EIR.

4.11.2.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to fire protection services if it would:

- **POL-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental

facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.

Methodology

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to serve existing and future population in the Project vicinity adequately, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis presents statistical data for CCPD and LAPD, including the ratio of crimes to population/residents and the ratio of sworn police officers to population/residents. The ratio of police officers to population/residents population is used by CCPD and LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population.

In consideration of the above factors, a determination is made as to whether CCPD or LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the CCPD and LAPD were consulted and responses were incorporated herein regarding the Project.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to police protection services resulting from a project is determined by whether the construction of new or expanded police facilities is a reasonably foreseeable direct or indirect effect of the project.

Based on input received of CCPD and LAPD, there are no current capital improvement plans for the construction or expansion of police facilities in the local vicinity of the Project Site in either the City of Culver City or the City of Los Angeles. Therefore, based on historical development of police facilities, it is assumed that in the event Culver City or the City of Los Angeles determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15332.

Project Design Features

Refer to Project Design Feature TRAF-PDF-1 (Construction Management Plan) in Section 4.12, *Transportation,* of this Draft EIR. In addition, the following project design feature related to police protection services during Project construction will be implemented as part of the Project:

POL-PDF-1 (Project Site Security and Access During Construction): During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.

POL-PDF-2 (Project Site Security and Access During Operation): During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will 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).

Analysis of Project Impacts

Threshold POL-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Impact Analysis

Construction

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. This could result in an increase in demand for police protection services. Consequently, developers typically take precautions to prevent trespassing through construction sites, such as installation of temporary fencing around the construction site to keep potential trespassers out, and deployment of roving security guards to prevent problems during a project's construction. When such precautions are taken, there is less of a need for local law enforcement at the construction site.

The Project Site is easily accessed from the adjacent roadways. The Project Site would need to be secured during construction in order to avoid potential theft. As detailed in Project Design Feature POL-PDF-1, during construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours, thereby reducing the potential need for police protection services from either CCPD or LAPD. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or vandalized. This is especially important since the Project Site is located at the intersection of multiple streets that have an active walking and/or driving environment. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the building construction phase.

Emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities

could occur, particularly during the construction of utilities and street improvements, impacts to police protection services would be considered less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the CCPD and LAPD;
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Furthermore, within Culver City, the Project Site would adhere to CCMC Section 9.08.385, which requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

A Construction Traffic Management Plan (CMP), subject to review and approval by both the City of Culver City and City of Los Angeles, would be incorporated into the Project as provided in Project Design Feature TRAF-PDF-1. The CMP would include street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP would also require that review and approval of any proposed lane closures include coordination with the fire and police departments of each city to minimize potential effects on traffic flow and emergency response.

Any potential CCPD or LAPD officers needed to patrol the Project Site would be existing officers at the respective CCPD or LAPD nearby police stations. It is not anticipated that any additional officers from CCPD or LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically-altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, impacts to police protection during Project construction would be less than significant.

Operation

As described in Chapter 2, *Project Description*, the Project would introduce 2,400 employees to the Project Site as well as visitors, which would increase the demand for police protection from the CCPD and LAPD compared to existing conditions.[16] As there are no proposed residential uses, the Project would only contribute to increasing the number of daytime non-resident populations (visitors and employees). The Project Site would continue to be served by both CCPD and LAPD. Generally, calls for police service from Building 1, within Culver City, would primarily be dispatched to CCPD, while calls from Building 2 would be dispatched to LAPD. However, the responding dispatcher would have discretion to have the CCPD and/or LAPD respond to service calls based on the nature of the call (i.e., emergency vs. non-emergency) in consideration of available units in proximity to the Project Site and anticipated response time.

As discussed above, the Project Site would be served by CCPD, which has 109 sworn officers, and is located in Patrol District 1. CCPD currently serves a daytime population of approximately 300,000+ people and had 2,130 total crimes in 2021. This represented an officer-to-daytime population ratio of approximately 1:2,752. Project operation would increase the officer to daytime population ratio of 1:2,774. This potential for an increase in officer to daytime population ratio would represent a negligible increase (e.g., 0.8). According to the CCPD, while staffing changes may be required as a result of the Project, no new or expanded police facilities would be needed as a result of Project implementation.[17]

The Project Site is also served by LAPD West Los Angeles Community Police Station, which has approximately 251 sworn personnel. West Los Angeles Community Police Station currently serves a population of approximately 228,000 people and had 5,644 total crimes in 2021. This represents an officer-to-population ratio of approximately 1:951. The Project does not propose any residential uses and would therefore not directly generate new residential population within Patrol District 1 or in the West Los Angeles Community Police Station area. The City does not separately consider non-residential population increases when calculating increased demand for police services. According to the LAPD, there are no current plans to expand the West Los Angeles Community Police Station or increase the number of personnel assigned to the West Los Angeles Community Area. [18] The LAPD has indicated that no new or expanded police facilities would be needed as a result of Project implementation.[19]

Moreover, the Project's operational demand for CCPD and/or LAPD police protection services would be reduced as the result of the proposed security features set forth in Project Design Feature POL-PDF-2, as described further above. Implementation of these security features would help

[16] The estimated occupant projections are based on the Applicant's operational space planning for office buildings and similar existing facilities operated by the Applicant.

[17] CCPD, Assistant Chief of Police Jason Sims, correspondence dated February 14, 2022. Provided in Appendix L of this Draft EIR.

[18] LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022. Provided in Appendix L of this Draft EIR.

[19] LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022. Provided in Appendix L of this Draft EIR.

reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for CCPD and LAPD services.

In addition, the Project would contribute revenue to the General Fund for the City of Culver City and City of Los Angeles which could fund CCPD and LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, CCPD and LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for CCPD and LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project would contribute.

Lastly, given the (1) incremental increases in crimes expected to be generated by the Project, (2) reduced demand for police services as the result of project design features, and (3) multi-jurisdictional patrols in the local Project vicinity available to serve the Project Site, CCPD and LAPD emergency response times are not expected to materially change under the Project. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times, and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the CCPD or LAPD from responding to emergencies at the Project Site or the surrounding area. Accordingly, Project operational impacts associated with emergency response times and emergency access would be less than significant.

Based on the above analysis and with implementation of Project Design Feature POL-PDF-2, development of the Project is not anticipated to generate a demand for additional police protection services that could exceed the CCPD's or LAPD's capacity to serve the Project Site. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, impacts to police protection during Project operation would be less than significant.

Mitigation Measures

Impacts regarding police protection services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 52 related projects (34 in the City of Culver City and 18 in the City of Los Angeles) that are anticipated to be developed within a 1.5-mile radius of the Project Site. For purposes of this analysis of cumulative impacts on police protection services, only the 34 related projects located within the City of Culver City will be considered as related projects for impacts to CCPD, and only those 18 projects located within the City of Los Angeles are considered as related projects for impacts to LAPD.

Construction

In general, impacts to CCPD and LAPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by respective city. Similar to the Project, each related project would be required to implement a construction traffic management plan to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as installing construction fencing and gating and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with CCPD or LAPD, as applicable, to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not adversely affect CCPD or LAPD service in the Project vicinity as drivers of police and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Operation

The related projects in the vicinity of the Project Site include residential, commercial, hotel, office, school, and other uses. **Table 4.11.2-6**, *Related Projects for Police Protection – CCPD*, shows the estimated cumulative residential and non-residential populations for the related projects in the CCPD service population area. As indicated in Table 4.11.2-6, the Project would represent the highest or most conservative new non-residential population on the Project Site. Thus, the Project (2,400 non-residents) in addition to the related projects (1,647 residents and 6,611 non-residents) would increase the service population of the City of Culver City in the CCPD service population area by an estimated 1,647 residents and 9,011 non-residents.[20]

The new population generated by the related projects would result in an officer to daytime population ratio of 1:2,850 and would require an additional 0.90 officers to maintain the existing ratio of 1:2,752. Therefore, the Project together with related projects would cumulatively generate increased demand for police protection services from the CCPD compared to existing conditions.

[20] While not all 2,400 employees generated under the Project would be within the Culver City Parcel, this analysis conservatively assumes that all employees would contribute to the daytime population of the CCPD service population area.

TABLE 4.11.2-6
RELATED PROJECTS FOR POLICE PROTECTION – CCPD

Land Use	Quantity	Daytime Population[a,b]
Residential	732 units	1,647 persons[c]
Commercial	135,880 sf	461 emp
Office	800,828 sf	3,203 emp
Schools	19,054 students	2,858 emp
Other Services	84,675 sf	88 emp
Total Resident Population	--	*1,647 persons*
Total Non-Resident Population	--	*6,611 emp*
Total Related Projects	**--**	**8,258**
Project	--	*2,400*
Total Resident Population + Project	**--**	**1,647 persons**
Total Non-Resident Population + Project	**--**	**9,011 emp**
Related Projects + Project	**--**	**10,658**

NOTES: du = dwelling units; sf = square feet, emp = employees.

[a] Number of employees per use, as applicable, are calculated in Appendix Q of this Draft EIR.

[b] Totals are rounded up.

[c] The residential population was calculated using a population per unit generation factor of 2.25 from the City of Los Angeles Department of Transportation VMT Calculator Documentation.

SOURCE: ESA, 2022.

Table 4.11.2-7, *Related Projects for Police Protection - LAPD*, shows the estimated cumulative residential and non-residential populations for the related projects in the LAPD service population area. As indicated in Table 4.11.2-7, the Project would represent the highest or most conservative new non-residential population on the Project Site. Thus, the Project (2,400 non-residents) in addition to the related projects (6,577 residents and 5,556 non-residents) would increase the service population in the LAPD service population area by an estimated 6,577 residents and 7,956 non-residents.[21]

The new population generated by the related projects would result in an officer-to-population ratio of approximately 1:966 and would require an additional 0.061 officers to maintain the existing ratio of 1:951. Therefore, the Project together with related projects would cumulatively generate increased demand for police protection services from the LAPD compared to existing conditions.

[21] While not all 2,400 employees generated under the Project would be within the Los Angeles Parcel, this analysis conservatively assumes that all employees would contribute to the daytime population of the LAPD service population area.

TABLE 4.11.2-7
RELATED PROJECTS FOR POLICE PROTECTION – LAPD

Land Use	Quantity	Daytime Population[a,b]
Residential	2,923 units	6,577 persons[c]
Commercial	129,256 sf	282 emp
Office	1,305,411 sf	5,222 emp
Other Services	104,537 sf	52 emp
Total Resident Population		6,577 persons
Total Non-Resident Population		5,556 emp
Total Related Projects	**--**	**12,133**
Project	--	*2,400*
Total Resident Population + Project	--	**6,577 persons**
Total Non-Resident Population + Project	--	**7,956 emp**
Related Projects + Project	**--**	**14,533**

du = dwelling units, sf = square feet, emp = employees

[a] Number of employees per use, as applicable, are calculated in Appendix Q of this Draft EIR.

[b] Totals are rounded up.

[c] The residential population was calculated using a population per unit generation factor of 2.25 from the City of Los Angeles Department of Transportation VMT Calculator Documentation.

SOURCE: ESA, 2022.

The estimates provided above are conservative because the population generated from related projects would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that do not proceed beyond the application phase or ultimately are not built. The projections also do not consider the reduction in criminal activity that is likely to occur as a result of development of the related projects, which include residential, commercial, hotel, office, school, and other uses as the related projects would seek to activate their frontages and increase the amount of activity around their respective sites. The commercial related projects would also be expected to provide on-site security, personnel and/or design features for their visitors and patrons.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Project area. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, related projects are anticipated to include adequate security features similar to the security features of the Project, plus any required mitigation measures that would serve to reduce cumulative impacts to police protection service, if appropriate. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the CCPD or LAPD from responding to emergencies at the Project Site or the surrounding area.

Additionally, the Project and the related projects would contribute revenue to the General Fund for the City of Culver City and City of Los Angeles which could fund CCPD and LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, CCPD and LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for CCPD and LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City of Culver City and City of Los Angeles. Through the regular budgeting efforts of each City, police department resource needs and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, neither CCPD nor LAPD have identified that it will be constructing a new station in the area impacted by this Project due to projects in the service area. If CCPD or LAPD determine that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are typically between 0.5 and one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant.

Conclusion

Based on the above, the Project's contribution to impacts associated with the provision of new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts to police protection services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.12 Transportation

4.12.1 Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *Crossings Campus Project Transportation Impact Study* (Transportation Impact Study)[1] for the Project prepared by Fehr & Peers, dated July 2022, and included in its entirety in Appendix M of this Draft EIR.[2] Because the Project Site is located in both the City of Culver City and the City of Los Angeles, the Transportation Impact Study was prepared in accordance with the City of Culver City's (City) CEQA transportation thresholds of significance and the Transportation Study Criteria and Guidelines (TSCG) adopted in July 2020, as well as the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG) adopted in July 2019 and updated in July 2020. Both the TSCG and the TAG establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California that require transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The base assumptions and technical methodologies used in the Transportation Impact Study were established in a detailed Memorandum of Understanding (MOU) with the City, which was signed in March 2022 and is provided in Appendix A of the Transportation Impact Study.

4.12.2 Environmental Setting

Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, state, regional, Culver City and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- Culver City Municipal Code
- Culver City General Plan Circulation Element

[1] Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022. Provided as Appendix M of this Draft EIR.

[2] The City of Culver City, Mobility & Traffic Engineering Division approved the Transportation Impact Study on July 14, 2022.

- Culver City Short Range Mobility Plan
- Culver City Bicycle and Pedestrian Action Plan
- Culver City Complete Streets Policy
- Los Angeles Municipal Code
- Los Angeles Mobility Plan 2035
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay District
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Los Angeles Interim Guidance for Freeway Safety
- Los Angeles Citywide Design Guidelines
- Los Angeles Plan for A Healthy Los Angeles

Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (U.S.C.), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

State

Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets

as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

Assembly Bill 32 and Senate Bill 375

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the California Transportation Commission guidelines.

California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. As stated in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is identified as being in a Transit Priority Area (TPA) and, therefore, pursuant to SB 743 impacts on the environment related to parking are not evaluated in this Draft EIR. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, which was an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

Based on these changes, the City of Culver City adopted its TSCG in July 2020 and the LADOT adopted its TAG in July 2019 and subsequently updated in July 2020; these two guidance documents set forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts, pursuant to SB 743.

CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[3] or a stop along an existing high quality transit corridor[4] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be

[3] "Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 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.

[4] "High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, Culver City developed a VMT Tool to measure VMT for development projects.[5] The methodology for determining VMT based on the VMT Tool is consistent with CEQA Guidelines Section 15064.3.

Regional

Southern California Association of Governments 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020-2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within one 0.5mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020-2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core

[5] Because the City of Culver City is the Lead Agency for the Project, the VMT analysis follows the City of Culver City's procedures identified in the TSCG and VMT Tool.

Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

Local

City of Culver City

Culver City Municipal Code

Sections of the City's Municipal Code (CCMC) applicable to transportation include, but are not limited to, the following:

- **Section 7.05.015 (Transportation Demand and Trip Reduction Measures):** Prior to issuance of a certificate of occupancy of any new development of 25,000 gross square feet (sf) of floor area or more, the property owner shall make lasting provisions for a bulletin board, display, case or kiosk displaying transit route, ridesharing, bicycle route, and carpool/vanpool information. Prior to the issuance of a certificate of occupancy of any new development of 50,000 gross sf of floor area or more, not less than 10 percent of the employee parking area shall be located as close as is practical to employee entrances and be reserved for potential carpool or vanpool vehicles. Additionally, preferential parking spaces reserved for employee vanpool services shall be accessible to vanpool vehicles. Furthermore, bicycle racks or other secure bicycle parking shall also be provided at a rate of four spaces for the first 50,000 sf of new development, and once space for each additional 50,000 sf. For projects of 100,000 gross sf of floor area or more, the following shall also be provided: (1) sidewalks or other designated pedestrian pathways following direct and safe routes from the external pedestrian circulation system, vehicle and bicycle parking areas and transit facilities, to each building in the development; (2) if determined necessary by the City to mitigate impacts, bus stop improvements; and (3) a safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers.
- **Section 9.04.035 (Construction):** All construction activity shall be prohibited, except between the hours of:
  - 8:00 a.m. and 8:00 p.m. Mondays through Fridays
  - 9:00 a.m. and 7:00 p.m. Saturdays
  - 10:00 a.m. and 7:00 p.m. Sundays
- **Section 17.320.020 (Number of Parking Spaces Required):** This section provides the minimum number of parking spaces required by land use. See Tables 3-3A for residential requirements, 3-3B for commercial requirements, and 3-3C for recreation, education and public assembly requirements.
- **Section 17.320.030 (Accessible Parking):** Parking spaces for persons with disabilities shall be provided in compliance with the Uniform Building Code and the Federal Accessibility Guidelines. Accessible parking spaces shall count toward fulfilling the parking requirements of this Chapter.
- **Section 17.320.050.B (Loading Area Requirements):** None-residential buildings meeting specified door opening and vehicle accessibility criteria shall include on-site loading areas.

Culver City General Plan Circulation Element[6]

The Circulation Element, amended through 1995, includes the following traffic and parking designations, goals, objectives and policies that relate to the Project:[7]

- **Policy 1.A:** Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.
- **Policy 1.F:** Reduce driveways and curb cuts on arterials in favor of side street and alley access, where appropriate, considering potential impacts on the neighborhoods served by the side streets.
- **Policy 2.C:** Maintain levels of transit service that are adequate to meet and encourage ridership demand.
- **Policy 2.H:** Encourage public transit links to sites of high trip-generating uses to maximize transit use by patrons and employees.
- **Policy 3.D:** Seek public and private contributions to provide support facilities for bicycle users (such as racks, secure storage, drinking fountains, etc.) where bikeways connect to turnouts, parks, and other open space areas, as appropriate.
- **Policy 3.G:** Encourage large business to include bike lockers or other secure bicycle storage and related facilities to support bicycle commuting by employees.
- **Policy 4.C:** Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.
- **Policy 4.D:** Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.
- **Policy 6.B:** Reduce pressure on on-street parking through provision of private and public off-street parking facilities.

Culver City Short Range Mobility Plan

The Short Range Mobility Plan FY 2022-26 (SRMP) is a five-year planning and policy document that outlines regulatory requirements, strategic performance goals and objectives, and provides a three-year financial plan for the Culver CityBus and the Culver City Transportation Department.[8] The SRTP provides analysis of the current fixed route service and the impact of local and regional transit projects, and evaluation of main corridors and the on-demand services offered by Culver CityBus.

Culver City Bicycle and Pedestrian Action Plan

The City of Culver City Bicycle and Pedestrian Action Plan (Action Plan) establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Plan aims to provide a safe, convenient, and accessible active transportation network,

6 The TSCG requires that the Transportation Impact Study must study the Circulation and Land Use Elements of the General Plan. However, the City of Culver City Land Use Element does not include transportation-related measures, objectives, or policies.

7 City of Culver City, General Plan Circulation Element, amended through 1995.

8 City of Culver City, Resolution Adopting 2022-2026 Short Range Mobility Plan, February 28, 2022.

accessible by users of all ages and abilities. The Plan uses Caltrans' four bicycle facility designations as follows:

- **Class I (Shared-Use Paths):** Shared-use paths, or paved trails, are facilities that provide completely separated, exclusive right-of-way for bicycling, walking, and other non-motorized uses.
- **Class II (Bicycle Lanes):** Bicycle lanes are striped lanes on roadways for one-way bicycle travel.
- **Class III (Bicycle Routes and Bike Boulevards):** Bicycle routes are signed routes where people riding bicycles share a travel lane with people driving motor vehicles.
- **Class IV (Separated Bikeways):** A separated bikeway, also known as a cycletrack, is an on-street facility that is physically separated from motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle.

The Action Plan was adopted by City Council in June 2020, and supersedes the 2010 City's Bicycle and Pedestrian Master Plan. The Action Plan shows that Washington Boulevard, immediately adjacent to the Project Site, is planned as a Class IV Separated Bikeway. The following actions in the Action Plan are applicable to the Project:

- **Action HS-3.2:** Use current design guidelines to encourage development patterns that promote active transportation and allow for short trips between destinations.
- **Action HS-4.1:** Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.

Culver City Complete Streets Policy

The City of Culver City adopted the Complete Streets Policy in January 2020. The Complete Streets Policy lays out a plan for designing safer, more vibrant streets that are accessible to people, no matter how they travel. The supplementary Complete Streets Design Guidelines have not yet been developed at the time of this study but are anticipated in the future. The following policies provided in the Complete Streets Policy are applicable to the Project:

- **Policy 5a.i:** The City will plan, design, operate, and maintain a transportation system that provides a connected network of streets and facilities that accommodate all modes of travel. The City will actively seek opportunities to repurpose or enhance rights-of-way to improve connectivity for pedestrians, bicyclists, and transit users.
- **Policy 5a.ii:** The City will pursue enhancements to the bicycle and pedestrian connectivity to public transit services, as well as to schools, parks, service retail, public facilities, regional connections, and business districts.
- **Policy 5b.ii:** The City will emphasize pedestrian access along and across City streets by, for example, providing convenient and protected crossing locations, shortening crossing distances through the use of curb extensions and tight curb radii, and enhancing signage and pavement markings.
- **Policy 5d.ii:** The City will coordinate street improvements with business owners along retail and commercial corridors to develop or enhance vibrant business districts.

City of Los Angeles

Los Angeles Municipal Code

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 limits construction activities to the hours from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. No construction is permitted on Sundays.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

With regard to on-site bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for long-term and short-term bicycle parking for residential and commercial buildings. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum of the requirements of the various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 sf of gross floor area, 50,000 sf of gross floor area, and 100,000 sf of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

Los Angeles Mobility Plan 2035

In August 2015, the Los Angeles City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[9] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

(1) Safety First

(2) World Class Infrastructure

(3) Access for All Angelenos

[9] Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

(4) Collaboration, Communication, and Informed Choices

(5) Clean Environments and Healthy Communities

Each of the goals contains objectives and policies to support the achievement of those goals.

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
  - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
  - Continuous local streets that connect to other streets at both ends, and/or
  - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network, and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The Vehicle Enhanced Network identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The City of Los Angeles General Plan Land Use Element includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the West Adams–Baldwin Hills–Leimert Community Plan area. The Community Plan includes the following transportation and circulation goals that are applicable to the Project:

- **Goal LU14:** A community that conserves, enhances and regenerates its distinctive "main street" character by promoting continued pedestrian orientation of commercial areas.
- **Goal LU20:** A community where residents will be able to access their daily needs by walking, biking or using other sustainable modes of transportation.
- **Goal LU40:** A community where the economic vitality of commercial nodes, centers and transit-oriented development areas is increased by encouraging contextual new development that maximizes access to transit, jobs, goods and services, and conserves desirable community character.
- **Goal LU43:** A community that promotes economic revitalization within community commercial nodes, centers and transit-oriented development areas by ensuring enhanced pedestrian orientation.
- **Goal M2:** A circulation system that supports successful neighborhood commercial areas by providing multi-modal access that accommodates public open space and gathering places, and streets that enhance sustainable watershed management.
- **Goal M3:** A community-wide pleasant street environment that is universally accessible, safe, and convenient for pedestrians.
- **Goal M4:** A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.
- **Goal M5:** An integrated land use and transit strategy that directs growth to areas that are accessible by transit facilities and services.
- **Goal M9:** A community where air quality and the health of residents is improved as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay District

The West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay District (CPIO) addresses the various land use issues in the community and provides regulations tailored to the specific needs for several CPIO subareas identified for the plan area.

The CPIO regulates permitted land uses, height, bulk and overall design of buildings along the major commercial corridors of the plan area as well as encourages sustainable, mixed-use development around transit stations, and promotes a greater diversity of retail and neighborhood services that provide access to healthy foods and physical activity.

The following objectives are relevant to the Project:

- **Purpose 3.C.** To foster revitalization of properties along the commercial corridors and at major intersection nodes throughout the Community Plan Area.
- **Purpose 3.D.** To promote and facilitate revitalization of properties that can capitalize upon close proximity to the La Brea, Farmdale, La Cienega and Culver City stations along the Mid-City Exposition Light Rail Transit Corridor (Expo Line).
- **Purpose 3.I.** To encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of the station area.
- **Purpose 3.J.** To improve the quality of life and the built environment by reducing the necessity for automobile dependence through better pedestrian orientation and conservation of prevailing neighborhood character.
- **Purpose 3.K.** To improve the quality of life for all those who live, work, and recreate in the Community Plan Area by promoting safe pedestrian activity, bicycle use, and better vehicular accessibility through pedestrian orientation of structures, enhanced streetscapes and urban design, as well as conservation of the neighborhood character.
- **Purpose 3.M.** To promote context sensitive pedestrian-oriented and transit-oriented projects, especially on greyfield and brownfield sites and other underutilized major intersection sites.
- **Purpose 3.N.** To encourage new infill development that promotes and enhances existing neighborhood character and is not dominated by excessive automobile orientation.

LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on VMT, pursuant to CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility

Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.

LADOT Manual of Policies and Procedures Section 321

The LADOT Manual of Policies and Procedures (MPP) identifies design standards and procedures for various roadway and traffic control elements, including street signs, parking restrictions, traffic signals, street improvements, roadway striping and channelization, and driveway design. Section 321, Driveway Design, of the MPP recommends a two-way driveway width of 30 feet and one-way driveway width of 16 feet for commercial developments, and also states that wider driveways may be appropriate to accommodate multiple entry lanes. In addition, LADOT requires that driveways providing access up to 100 parking spaces have a minimum 20 feet reservoir distance from the sidewalk, and driveways providing access to 101 to 300 parking spaces should have a minimum 40 feet reservoir distance from the sidewalk. For driveways providing access to more than 300 vehicle parking spaces, a minimum 60-foot reservoir distance from the sidewalk is required, and gates or guard booths should be set back far enough from the back of the sidewalk to ensure that entering or exiting vehicles will not block sidewalk, signalized crosswalks, or extend into street.

LADOT Vision Zero

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.[10] The nearest street on the High Injury Network is Venice Boulevard, located directly adjacent to and north of the Project Site. In order to realize the goals and objectives of the Vision Zero Program, LADOT has initiated a number of projects along various street corridors. These projects generally involve improvements to the streets, bicycle facilities, and pedestrian facilities such as installation or upgrading of crosswalks, traffic signals, and bicycle lanes to prevent deaths and severe injuries. There are currently no improvements projects planned on any of the nearby streets on the High Injury Network.[11]

[10] Los Angeles Department of Transportation (LADOT), Vision Zero Maps, https://ladotlivablestreets.org/programs/vision-zero/maps. Accessed June 30, 2022.

[11] Los Angeles Department of Transportation (LADOT), Vision Zero Maps, https://ladotlivablestreets.org/programs/vision-zero/maps. Accessed June 30, 2022.

Los Angeles Interim Guidance for Freeway Safety

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

Los Angeles Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Los Angeles General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

Los Angeles Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[12] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

Existing Conditions

The Project Site encompasses approximately 4.46 acres at 8825 National Boulevard and 8771 Washington Boulevard and 8876, 8884, 8886, and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in the cities of Culver City and Los Angeles, and is bounded by National Boulevard to the west, Venice Boulevard to the north, and Washington Boulevard to the south. The Project Site is located in an urban setting near existing transit with a variety of land uses and densities. The Transportation Impact Study's study area includes the Project Site, its associated street frontages, and the surrounding vicinity.

Existing Street System

As described below, the Project Site and the transportation study area is well-served by a network of freeways and streets. Washington Boulevard and National Boulevard currently provide access to the Project Site, while primary regional freeway access to the Project Site is provided by Interstate 10 (I-10 or Santa Monica Freeway) and Interstate 405 (I-405 or San Diego Freeway). The streets in the study area are under the jurisdiction of either the City of Culver City or the City of Los Angeles. Freeways are under the jurisdiction of the California Department of Transportation (Caltrans).

[12] City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, November 2021.

Freeways

- **Interstate 10 (I-10 or Santa Monica Freeway):** The Santa Monica Freeway runs east/west approximately 630 feet north of the Project Site. Access to the Santa Monica Freeway is available via interchanges at Robertson Boulevard, Venice Boulevard, and Washington Boulevard.
- **Interstate 405 (I-405 or San Diego Freeway):** The San Diego Freeway runs north/south approximately 2.09 miles west of the Project Site. Access to the San Diego Freeway is available via interchanges at Culver Boulevard and Venice Boulevard/Washington Boulevard.

Local Roadways

- **Robertson Boulevard:** Robertson Boulevard is primarily a north/south avenue that provides four travel lanes, two in each direction. North of Venice Boulevard, a short segment of Robertson Boulevard is a one-way street with two travel lanes providing connection to I-10. The two-way segment resumes east of the I-10 on-ramp continuing north towards Beverly Hills. The posted speed limit is 35 miles per hour (mph) in the study area. Robertson Boulevard is classified as an Avenue II south of National Boulevard and a Modified Avenue II north of National Boulevard in Los Angeles.
- **National Boulevard:** National Boulevard is generally an east/west arterial that provides four travel lanes, two in each direction, with a center left-turn lane. National Boulevard runs north/south adjacent to the Project Site. Parking is provided within the study area on one or both sides of the street. No parking is allowed on either side of the street south of Venice Boulevard. The posted speed limit is 40 mph in the study area. In Los Angeles, National Boulevard is classified as an Avenue II west of Robertson Boulevard; a Boulevard II between Robertson Boulevard and Regent Street and south of Venice boulevard; and a Modified Avenue II between Regent Street and Venice Boulevard. The segment of National Boulevard located in Culver City is classified as a Secondary Artery.
- **Venice Boulevard:** Venice Boulevard is a major east/west arterial that provides six travel lanes, three in each direction. Parking is provided within the study area on one or both sides of the street. The posted speed limit is 40 mph in the study area. In Los Angeles, Venice Boulevard is classified as a Boulevard II west of National Boulevard and a Modified Boulevard II east of National Boulevard.
- **Washington Boulevard:** Washington Boulevard is a major east/west arterial that provides two travel lanes, one in each direction, with a center left-turn lane and a bus-only lane in each direction. Parking is provided within the study area on one or both sides of the street. The posted speed limit is 35 mph in the study area. Washington Boulevard is classified as a Primary Artery in Culver City.
- **Helms Avenue:** Helms Avenue is a north/south street that provides two travel lanes, one in each direction, which connects Venice Boulevard and Washington Boulevard. Parking is provided within the study area on one or both sides of the street, and there is no posted speed limit. Helms Avenue is classified as a Local Street – Standard in Los Angeles north of Venice Boulevard and a Local Street in Culver City south of Venice Boulevard.
- **La Cienega Boulevard:** La Cienega Boulevard is a major north/south arterial that provides six travel lanes, three in each direction, with a center left-turn lane. Parking is provided within the study area on one or both sides of the street. The posted speed limit is 35 mph in the study area. La Cienega Boulevard is classified as an Avenue I in Los Angeles.
- **Wesley Street:** Wesley Street is a north/south street that provides two travel lanes, one in each direction, which connects Washington Boulevard and National Boulevard. Parking is provided

within the study area on one or both sides of the street. Wesley Street is classified as a Local Street in Culver City.

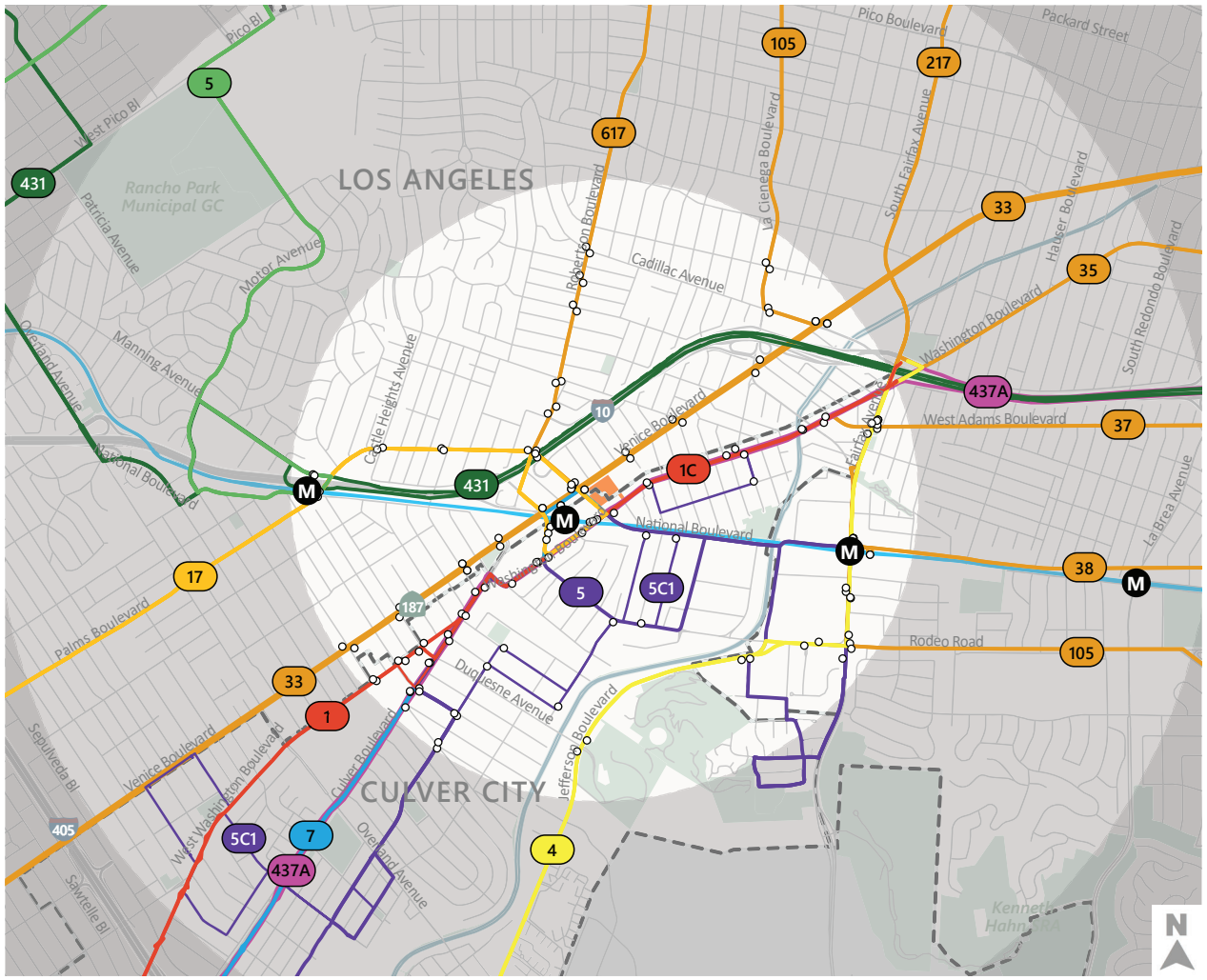
- **Landmark Street:** Landmark Street is an east/west street that provides two lanes, one in each direction. Parking is provided within the study area on one or both sides of the street, and there is no posted speed limit. Landmark Street is classified as a Local Street in Culver City.
- **Fairfax Avenue:** Fairfax Avenue is a major north/south arterial that provides four travel lanes, two in each direction with a center left-turn lane. Parking is provided within the study area on one or both sides of the street. The posted speed limit is 35 mph in the study area. Fairfax Avenue is classified as an Avenue II in Los Angeles and a Primary Artery in Culver City.

Public Transit

The Project Site and study area are currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) E Line and several bus routes serviced by Metro, Culver City Bus, Big Blue Bus, and LADOT. Transit lines located within one-mile of the Project Site are listed below and identified in **Figure 4.12-1**, *Existing Transit Lines*:[13]

- **Culver City Bus Line 1**: Line 1 is a local east/west route traveling from Washington Boulevard and Fairfax Avenue to Venice Beach on weekends and weekdays. The route travels along Washington Boulevard in the study area. The eastern end of Line 1 provides connections to Metro buses at the Washington/Fairfax Transit Hub. The line is a key route connecting downtown Culver City and Venice Beach to the Metro "E" Line Culver City Station (light rail). The closest stop to the Project Site is located at the intersection of Washington Boulevard and National Boulevard.
- **Culver City Bus Line 4:** Line 4 is a local east/west route traveling from Playa Vista to the West LA Transit Center on weekdays and Saturdays. The route travels along Jefferson Boulevard and Fairfax Avenue in the study area. This line provides service to West Los Angeles College, the Culver City Transit Center, the Metro "E" Line La Cienega/Jefferson Station, and West Los Angeles Transit Center. The closest stop to the Project Site is located at the intersection of La Cienega Boulevard and Jefferson Boulevard.
- **Culver City Bus Line 5:** Line 5 is a weekday community circulator that connects Inglewood and Washington Boulevards with Blair Hills via Braddock Drive. Destinations include Culver City Junior and Senior High Schools, Downtown Culver City, the Hayden Industrial Tract and La Cienega Boulevard. Line 5 only operates when school is in session. The closest stop to the Project Site is located at the intersection of Washington Boulevard and Landmark Street.
- **Culver City Bus Line 7:** Line 7 is a local northeast/southwest line that runs primarily along Culver Boulevard in the study area. Line 7 connects Downtown Culver City with the Fisherman's Village in Marina Del Rey. The line runs every 30 minutes on the weekdays and connects to the Metro "E" Line. The closest stop to the Project Site is located on Washington Boulevard by the Metro "E" Line Culver City Station.

[13] The bus service described pertains to conditions before the COVID-19 pandemic. Although bus service was temporarily reduced and would be expected to fluctuate as the situation evolves, it is expected that bus service would return to pre-pandemic conditions in the long-term future.



Project Site
1.0-mile radius from Project Site
2.0-mile radius from Project Site
Bus stops within 1.0 mi
Bus lines within 1.0 mi (see table)
Metro Rail Stations
Metro E Line
Cities
Parks

Line	Weekday Frequency (min.)			Pre-Pandemic Weekday Line Ridership
	Peak	*Midday*	*Evening*	
Big Blue Bus				
5	50-60	60	60	800
17	20	20	20-60	1,600
Culver City Bus				
1	15	15	30	3,083
1C	10	15	15	
4	40-60	40-60	-	855
5	*	*	*	66
5C1	*	*	*	
7	40	40-45	-	390
LADOT Commuter Express				
431	25-30	-	-	161
437A	15-30	-	-	83
Metro Bus				
33	7.5	7.5	15-30	10,085
35	15	15	40-60	7,702†
37	10	15	20-60	16,673
38	30-40	30	30-40	7,702†
105	10	10	15-60	10,057
217	10	10	15-30	6,366
617	45	45	60	618‡

**: Culver City Bus lines 5 and 5C1 operate only 1-3 trips per day, effectively serving as school bus routes.*
†: Metro bus lines 35 and 38 are joint service with shared ridership.
‡: Metro bus line 617 is a new service (est. July 2017).

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SOURCE: Fehr & Peers, 2022

Crossings Campus

Figure 4.12-1
Existing Transit Lines

ESA

- **Metro "E" Line:** Metro "E" Line is a light rail line that travels from Downtown Los Angeles to Santa Monica. The Metro "E" Line serves USC, Exposition Park, the Crenshaw District, Culver City, Palms, the Santa Monica Pier, and the Third Street Promenade. The Metro "E" Line Culver City Station is less than 600 feet from the Project Site.
- **Metro Bus Line 33:** Line 33 is a local line from Downtown Los Angeles to Santa Monica via Venice Boulevard. Line 33 runs east/west along Venice Boulevard in the study area and north/south along Main Street to meet the Santa Monica Pier on weekdays and weekends. The closest stop to the Project Site is located at the intersection of Venice Boulevard and National Boulevard.
- **Metro Bus Line 35/38:** Line 35/38 is a local line from Downtown Los Angeles to the Washington/Fairfax Transit Hub. Line 35/38 runs east/west along Washington Boulevard. The closest stop to the Project Site is located at the Washington/Fairfax Transit Hub.
- **Metro Bus Line 37:** Line 37 is a local line from Downtown Los Angeles to the Washington/Fairfax Transit Hub. Line 37 runs east/west along Adams Boulevard. The closest stop to the Project Site is located at the Washington/Fairfax Transit Hub.
- **Metro Bus Line 105:** Line 105 is a local line serving West Hollywood to Vernon via La Cienega Boulevard and Vernon Avenue. Line 105 runs north/south along La Cienega in the study area and then runs east/west along Obama Boulevard east of the La Cienega Boulevard/Obama Boulevard intersection on the weekdays and weekends. The closest stop to the Project Site is located at the intersection of La Cienega Boulevard and Jefferson Boulevard.
- **Metro Bus Line 217:** Line 217 is a local line serving the Hollywood/Vine Station and La Cienega via Hollywood Boulevard and Fairfax Avenue. Line 217 runs east/west along Hollywood Boulevard from N. Vermont Avenue to Fairfax Avenue and then runs north/south along Fairfax Avenue to Jefferson Boulevard where the La Cienega Station is located. The closest stop to the Project Site is located at the intersection of La Cienega Boulevard and Jefferson Boulevard.
- **Metro Bus Line 617:** Line 617 is a local north/south line providing connections to the Culver City E Line station from Beverly Hills. Line 617 runs north/south along Robertson Boulevard from the Culver City Metro "E" Line station in the south to the Beverly Center in the north. A portion of the route runs east/west on Burton Way to Beverly Boulevard where it runs north/south until Pico Boulevard. The closest stop to the Project Site is located at the intersection of Venice Boulevard and National Boulevard.
- **Santa Monica Big Blue Bus Line 5:** Line 5 is primarily an east/west line serving Palms, Century City, and Santa Monica on weekdays. The line runs north/south along Motor Avenue in the Palms area and then east/west along Olympic Boulevard towards Santa Monica. Line 5 also provides connection to the Metro "E" Line Palms Station. The closest stop to the Project Site is located at Metro "E" Line Palms Station at Manning Avenue and National Boulevard.
- **Santa Monica Big Blue Bus Line 17:** Line 17 is primarily a north/south line serving Palms, the VA Medical Center, and UCLA on weekdays and weekends. The line runs east/west along Palms Boulevard in the Palms area and then north/south along Sawtelle Boulevard until reaching the VA Medical Center where the line then travels northeast towards UCLA. Line 17 also provides connection to the Culver City Metro "E" Line station. The closest stop to the Project Site is located at the intersection of Robertson Boulevard and Venice Boulevard.
- **LADOT Commuter Express Route 431:** Route 431 is a commuter express route connecting Westwood and Downtown Los Angeles. Route 431 provides service to Downtown Los Angeles from Westwood in the A.M. and service to Westwood from Downtown Los Angeles in the

P.M. via I-10. Route 431 operates Monday through Friday with no service on the weekend. The closest stop to the Project Site is located at the Metro "E" Line Palms Station.

- **LADOT Commuter Express Route 437A:** Route 437A is a commuter express route connecting West Los Angeles and Downtown Los Angeles. Route 437A provides service to Downtown Los Angeles from Culver City/Marina Del Rey/Venice in the A.M. and service to Culver City/Marina Del Rey/Venice in the P.M. via Culver and Washington Boulevards and I-10. Route 437A operates Monday through Friday with no service on the weekend. The closest stop to the Project Site is located at the Washington Boulevard/National Boulevard intersection.

Bicycle and Pedestrian Facilities

Existing bicycle facilities are present on all three roadways providing access to the Project Site: Class II bike lanes on Venice Boulevard and National Boulevard, and Class IV protected bike lanes on Washington Boulevard. A Class I facility, the Ballona Creek Bike Path, runs along Ballona Creek approximately 0.75 miles south of the Project Site and provides bike and pedestrian connections to Marina Del Rey to the west and Downtown Culver City to the east. The Ballona Creek Bike Path can be accessed from the Project Site via the bicycle facilities described above on Venice Boulevard and National Boulevard.

Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. A map of the existing bike facilities, in addition to the proposed bike facilities per the Culver City Bicycle & Pedestrian Action Plan (Action Plan), adopted by City Council in June 2020, is provided in **Figure 4.12-2,** *Existing and Planned Bicycle Facilities*. According to the Action Plan, Class IV separated bikeways are recommended along Washington Boulevard along the Project Site frontage.

All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Marked crosswalks are present at all signalized intersections in the study area. Pedestrian walk phases are either automatically provided at the intersections or are actuated by pedestrian push-buttons.

Project Site Vehicular Access/Circulation

Existing vehicular access to the Culver City Parcel is currently provided from two driveways along National Boulevard; access to the one-lane Helms alley that forms the eastern boundary of the Project Site is provided at either end on Venice Boulevard and Washington Boulevard.

4.12.3 Project Impacts

Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the CEQA Guidelines. A project would result in significant adverse impacts related to transportation if it would:

- **TRAF-1:** Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities;
- **TRAF-2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b);

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SOURCE: Fehr & Peers, 2022

Crossings Campus

Figure 4.12-2
Existing and Planned Bicycle Facilities

ESA

- **TRAF-3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- **TRAF-4:** Result in inadequate emergency access.

Methodology

The analysis of transportation impacts considers potential Project effects related to 1) potential conflicts with transportation-related plans, ordinances, or policies; 2) a substantial increase in VMT; 3) increased hazards due to a geometric design feature or incompatible use; and 4) emergency access.

The scope of the analysis in the Transportation Impact Study was developed in consultation with the City of Culver City and City of Los Angeles. The base assumptions and VMT technical methodologies were identified and agreed to in the MOU included as Appendix A of the Transportation Impact Study. The subsections below describe the methodologies to evaluate each significance threshold.

Review for Conflicts with Plans, Programs, Ordinances, or Policies

As noted in Section 4, *CEQA Transportation Analysis Requirements*, of the TSCG, as well as Section 2.1-2 of the TAG, the TSCG and TAG requires review of whether a Project conflicts with transportation-related programs, plans, ordinances, and policies. The analysis addresses whether the Project would conflict with a program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans, and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan, or policy would foreseeably result in a physical impact on the environment.[14]

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project's study area. The analysis considers whether there would be a significant impact to the environment to which both the Project and related projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located in the same project area, were to preclude the City's ability to serve transportation user needs.

VMT Analysis

The City of Culver City developed a VMT Tool to assess the VMT impacts of proposed development projects within the City. The VMT Tool also assesses the effectiveness of selected

[14] The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

TDM measures proposed for a project based on available research. With the City of Culver City as the lead agency, the VMT analysis follows the City of Culver City's VMT procedures identified in the TSCG and VMT Tool.

The TSCG specifies Culver City's VMT screening criteria for development projects. Per the criteria, if a development project meets any of the below VMT screening thresholds, it would be exempted from having to conduct VMT impact analysis to comply with CEQA, and a less than significant impact is presumed.

1. Small projects that result in less than 250 daily or 25 peak hour trips.
2. Projects within one-half mile from these key Transit Priority Areas (TPAs): Metro "E" Line Culver City Station, Metro "E" Line La Cienega Station, Westfield-Culver City Transit Center, or Sepulveda/Venice Boulevard intersection.
3. Projects located within any TPA where at least 15% of the on-site residential units are affordable.
4. Affordable housing projects where 100% of the dwelling units are affordable.
5. Local serving retail projects having less than 50,000 sf in size at a single store.

The Project is located less than 600 feet from the Metro "E" Line Culver City Station, well within the one-half mile from a key TPA as identified in Threshold 2. Therefore, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT.

Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities (sidewalks or paths) or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for auto/pedestrian and auto/bicycle conflicts and the severity of consequences that could result.

In addition, in accordance with LADOT's interim guidance on freeway safety analysis issued in May 2020, a freeway safety analysis was conducted to evaluate whether the addition of Project traffic could cause or lengthen an off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.[15]

The interim guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project is

[15] City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

projected to add 25 or more trips to the following freeway off-ramps during both the morning and afternoon peak hours:

- I-10 Westbound Off-ramp at Robertson Boulevard
- I-10 Westbound Off-ramp at Venice Boulevard
- I-10 Westbound Off-ramp at Washington Boulevard

A project would result in a significant impact at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 mph.

If a potential safety issue is identified, then, to offset this potential condition, a project should consider preferred corrective measures. Such measures to reduce the project's trip generation include TDM strategies, investments in active transportation or transit system infrastructure, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in environmental issues.

Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

Project Design Features

The following project design features are applicable to the Project:

> **TRAF-PDF-1: Construction Management Plan.** A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning managers for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

Prior to commencement of construction, the contractor will advise each City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City and/or City of Los Angeles staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community:

1. Construction schedule and hours.
2. Framework for construction phases.
3. Identify traffic diversion plan by phase and activity.
4. Potential location of construction parking and office trailers.
5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
6. Emergency access plan.
7. Demolition plan.
8. Staging plan for the concrete pours, material loading and removal.
9. Crane location(s).
10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
11. Community notification procedures.

The FCMP will at a minimum include the following:

1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations.
2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided.
3. Construction plans and procedures to address community and both the appropriate Cities of Culver City and Los Angeles personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's

Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses.

4. Procedures for the training and certification of flag persons.
5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by either the City of Culver City or the City of Los Angeles, depending on the jurisdiction of the roadway. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles and City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the fire and police departments of each City to minimize potential effects on traffic flow and emergency response.
8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.

In addition, the Project proposes voluntary measures to reduce drive-alone vehicle trips to/from the Project Site as part of a TDM Program. The TDM Program would offer a wide variety of options to support employees who choose to use a commute alternative to reach their destination. This program is designed to make non-automobile commutes attractive and viable options by providing employees with mobility once they arrive at work, access to needed services during the day, or financial incentives to participate. The Project will implement the following project design feature:

TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement the following TDM measures subject to Culver City Transportation Department and LADOT review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site:

- **TDM Support Services:** The Project will offer tailored trip planning assistance with in-house TDM coordinators. Assistance will be available for all employees online, by email, and by phone. The Project will also host a virtual kiosk every week to chat with a team member and have any questions answered.
- **Marketing and Communications:** The Project will provide a comprehensive website detailing alternative transportation options such as carpool, rail, shuttle,

coach, bike, and options available for transportation once on campus. To provide transportation information to new employees, the Commute Program will make a presentation at New Employee Orientation. The Commute Program will also actively monitor email lists and group lists to discuss and collaborate with employees on improving commute programs. Information dissemination tools will include monthly news updates, web updates, email templates, lobby information centers, communication regarding service expansions, and attending internal employee events.

- **Public Transit:** The Project will be served by an existing fixed-route intercampus shuttle program to provide connections to other Applicant-occupied buildings in Culver City and to public transit. The Project will also offer a monthly transit subsidy which provides a financial incentive for riding transit instead of driving to the Project Site.
- **Rideshare:** The Project will provide an online tool that matches riders with drivers originating from similar locales. This will reduce single occupancy vehicle trips to and from the Project.
- **Bicycling:** In addition to providing Code-required bicycle parking and shower facilities, the Project will provide a monthly subsidy to employees who commute by bicycle to work, which can be used to pay for bicycle, maintenance, and storage, or towards upgrading an existing bicycle or purchasing a new bicycle. The Project will also promote cycling by participating in the County's annual Bike to Work Day, providing discounts on select cycling products, providing a website that has information on safe cycling and cycling apps.
- **Walking:** The Project will provide enhanced access points to the site to improve pedestrian connectivity and expand adherence to the Americans with Disabilities Act (ADA). Employees will be educated on local neighborhood destinations within walking distance and will be encouraged to walk to events, meetings, and meals whenever possible. The areas surrounding the walkways and sidewalks will be well-landscaped and maintained, with pedestrian-oriented lighting to contribute to the safety of walking at night.
- **Pre-tax Commuter Benefit:** A pre-tax commuter benefit will be provided to employees for commute-related expenses such as public transit (after the transit subsidy), vanpooling, and parking. The commuter benefit will supplement the transit and bicycle subsidies.
- **Commuter Club:** A Commuter Club is an opt-in program that offers employees the opportunity to receive Commute Program email updates about schedule updates, new service, events, and programs.
- **Commute Expert Program:** This program will provide people using a commute alternative an opportunity to meet other employees who are using the same mode who can "mentor" them by providing answers to questions about using that mode, stop locations, routes, or local transit options.
- **Guaranteed Ride Home Program:** The Project will sponsor a guaranteed ride home for Project Site employees who came to work without their own car in the event of an unexpected situation or emergency when walking, biking, carpooling, or taking transit home will not be feasible.

- **Intercampus Shuttles:** The Project will provide on-request and fixed route intercampus shuttles between other buildings occupied by the Applicant during work hours.
- **Campus Bike Share Program:** A Campus Bike Share program will be implemented to provide a transportation option between other buildings occupied by the Applicant. Campus bikes will be equipped with GPS tracking and an electronic rear-wheel lock to help secure the fleet. Campus bikes will be managed and maintained by a local bike maintenance vendor.
- **On-site Services:** The Project will provide its employees with on-site amenities such as a full-service cafeteria, coffee bars, and shower facilities. The offered services will contribute to limiting the number of vehicle trips employees will need to take off-site during the day.

Analysis of Project Impacts

Threshold TRAF-1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities?

Impact Analysis

As previously noted under the Methodology section, the Culver City TSCG includes of a list of transportation-related programs, plans, ordinances, and policies that should be consulted to identify the potential for conflicts with the Project. Upon review of the listed plans, the following were determined relevant to the Project: the City's General Plan Circulation and Element, Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, and Complete Streets Policy. In addition, transportation-related plans, programs, ordinances, or policies were also reviewed for consistency with the Project as required by the LADOT TAG. These include the following: Mobility Plan, Plan for a Healthy Los Angeles, Citywide Design Guidelines, Municipal Code, Vision Zero, and the West Adams–Baldwin Hills–Leimert Community Plan.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

City of Culver City

Culver City General Plan Circulation Element

The Circulation Element includes numerous policies that are applicable to the Project. **Table 4.12-1**, *Consistency of the Project with Applicable Policies of the Circulation Element*, provides determinations of whether the Project would conflict with any of the applicable policies in the Circulation Element. As shown therein, the Project would not conflict with any of the applicable policies.

TABLE 4.12-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE CIRCULATION ELEMENT

Policy	Would the Project Conflict?
1.A. Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.	**No Conflict.** The Project's close proximity to several public transportation options would support this policy by allowing employees to commute via alternative modes to reduce volumes. The proposed TDM Program (refer to Project Design Feature TRAF-PDF-2) would also help to reduce volumes on nearby roadways due to employee commute. The Project would also provide a new curb cut pick-up/drop-off zone on Venice Boulevard and National Boulevard. This pick-up/drop-off zone would facilitate smoother operations on Venice Boulevard and National Boulevard by keeping pick-up/drop-off operations out of through vehicle and bike lanes.
1.F. Reduce driveways and curb cuts on arterials in favor of side street and alley access, where appropriate, considering potential impacts on the neighborhoods served by the side streets.	**No Conflict.** The Project would support this policy by maintaining the existing number of driveways and curb cuts on the three frontages of the Project Site. Because the Project is fronted on three sides by arterials, making use of side streets for driveways is not possible, but the Project is proposing Helms alley access on the east side. The Project would also restore the sidewalk on the east side of National Boulevard where there is presently a driveway entry to a surface parking lot across from the Ivy Station driveway.
2.C. Maintain levels of transit service that are adequate to meet and encourage ridership demand.	**No Conflict.** The Project Site is located in an area well served by public transportation, including Metro, 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. The Project Site is located one block east from the Metro "E" Line Culver City Station.
2.H. Encourage public transit links to sites of high trip-generating uses to maximize transit use by patrons and employees.	**No Conflict.** The Project would support this policy by providing a new office development adjacent to frequently running transit lines and the Metro "E" Line Culver City Station, which would encourage ridership. The proposed TDM Program (refer to Project Design Feature TRAF-PDF-2) would also encourage ridership through various programs.
3.D. Seek public and private contributions to provide support facilities for bicycle users (such as racks, secure storage, drinking fountains, etc.) where bikeways connect to turnouts, parks, and other open space areas, as appropriate.	**No Conflict.** The Project would support this policy by providing 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes.
3.G. Encourage large business, commercial centers, and industrial parks to include bicycle lockers, or other secure bicycle storage and related facilities, to support bicycle commuting by employees.	**No Conflict.** The Project would support this policy by providing 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes.
4.C. Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
4.D. Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
6.B. Reduce pressure on on-street parking through provision of private and public off-street parking facilities.	**No Conflict.** The Project would support this policy by providing an adequate amount of parking according to the Culver City Municipal Code and Los Angeles City Municipal Code, which require 1,216 off-street parking spaces based on the size of the development and land use type. The Project would provide 1,216 off-street parking spaces within two separate three-level subterranean garages, one under each proposed building.

SOURCE: Fehr & Peers, 2022.

Culver City Short Range Mobility Plan

The Culver City SRMP provides a service analysis of the current fixed route service, the impact of local and regional transit projects, and an evaluation of main corridors and the on-demand services offered, such as Dial-A-Ride and microtransit.[16] It focuses on public transportation services, enhancing fixed route and paratransit services, expanding micro mobility with scooters and bikes, and offering microtransit services. Implementation of the SRMP is largely within the purview of the City rather than private developers or property owners. The Project would not preclude the implementation of the SRMP. The Project would be in support of this plan because of the Project's proximity and accessibility to several public transportation options. The Project Site is located in an area well served by public transportation as described above. Therefore, the Project would not conflict with the SRMP.

Culver City Bicycle and Pedestrian Action Plan

The Action Plan establishes visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient and accessible active transportation network, accessible by users of all ages and abilities. **Table 4.12-2**, *Consistency of the Project with Applicable Actions of the Action Plan*, provides determinations of whether the Project would conflict with any of the applicable actions of the Action Plan. As shown therein, the Project would not conflict with any of the applicable actions.

TABLE 4.12-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE ACTIONS OF THE ACTION PLAN

Action	Would the Project Conflict?
HS-3.2. Use current design guidelines to encourage development patterns that promote active transportation and allow for short trips between destinations.	**No Conflict.** The Project supports this action by proposing offices near several transit options that also offer bicycle parking, encouraging pedestrian trips and shorter trips between destinations. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
HS-4.1. Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.	**No Conflict.** The Project supports this action by implementing 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces. The Project Site frontage designs and access points would not preclude the implementation of the planned Class IV separated bikeway planned along Washington Boulevard fronting the Project Site, or any other planned high-quality bicycle facilities. The Project would primarily use or modify existing driveways, and a Class IV bikeway design would, by necessity, need to accommodate site access. During the design of a new bicycle facility, planners and engineers will take into account existing and planned site access needs and accommodate those needs by employing best practices to alert all road users to the potential mixing zones and conflict areas with geometric design, signage and striping. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.

SOURCE: Fehr & Peers, 2022.

16 The Federal Transit Administration defines microtransit as *"IT-enabled private multi-passenger transportation services that serve passengers using dynamically generated routes, and may expect passengers to make their way to and from common pick-up or drop-off points. Vehicles can range from large SUVs to vans to shuttle buses. Because they provide transit-like service but on a smaller, more flexible scale, these new services have been referred to as microtransit."* Federal Transit Administration (FTA), Shared Mobility Definitions, Microtransit, https://www.transit.dot.gov/regulations-and-guidance/shared-mobility-definitions, last updated February 28, 2020.

Culver City Complete Streets Policy

The City's adopted Complete Streets Policy includes numerous policies that are applicable to the Project. **Table 4.12-3**, *Consistency of the Project with Applicable Policies of the Complete Streets Policy*, provides determinations of whether the Project would conflict with any of the applicable policies in the Complete Streets Policy. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE 4.12-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE COMPLETE STREETS POLICY

Policy	Would the Project Conflict?
5a.i. The City will plan, design, operate, and maintain a transportation system that provides a connected network of streets and facilities that accommodate all modes of travel. The City will actively seek opportunities to repurpose or enhance rights-of-way to improve connectivity for pedestrians, bicyclists, and transit users.	**No Conflict.** The Project supports this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk and parkway widths, and enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Existing transit options within close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
5a.ii. The City will pursue enhancements to the bicycle and pedestrian connectivity to public transit services, as well as to schools, parks, service retail, public facilities, regional connections, and business districts.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
5b.ii. The City will emphasize pedestrian access along and across City streets by, for example, providing convenient and protected crossing locations, shortening crossing distances through the use of curb extensions and tight curb radii, and enhancing signage and pavement markings.	**No Conflict.** The Project would support this policy through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
5d.ii. The City will coordinate street improvements with business owners along retail and commercial corridors to develop or enhance vibrant business districts.	**No Conflict.** The Project supports this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would enhance pedestrian rights-of-way by introducing landscaping along the sidewalks and widening the sidewalk along National Boulevard.

SOURCE: Fehr & Peers, 2022.

City of Los Angeles

Los Angeles Municipal Code

The Project and its features are consistent with the City's Municipal Code. The Project would comply with applicable code requirements such as bicycle parking and adequate sight distance and pedestrian movement controls.

Los Angeles Mobility Plan 2035

Mobility Plan 2035 includes several policies that are applicable to the Project. **Table 4.12-4**, *Consistency of the Project with Applicable Policies of Mobility Plan 2035*, provides determinations of whether the Project would conflict with any of the applicable policies or programs in Mobility Plan 2035. As shown therein, the Project would not conflict with any of the applicable policies or programs.

TABLE 4.12-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF MOBILITY PLAN 2035

Policy or Program	Would the Project Conflict?
2.1. Adaptive Reuse of Streets: Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** The Mobility Plan defines Venice Boulevard and National Boulevard as a modified Boulevard II. The Project has frontage on National Boulevard in Culver City. A dedication of land from the Project Site would be required to provide wider sidewalks along National Boulevard. The Applicant would seek a Waiver of Dedication and Improvement (WDI) to reduce the dedication and provide an easement for the sidewalk along National Boulevard. The 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 along the portion of National Boulevard in the City of Los Angeles. This requested WDI would allow for consistent sidewalk widths across the two jurisdictions for an overall sidewalk width of at least 15 feet. However, the Project would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future adaptive reuse of streets for multiple purposes, such as transit, pedestrian, and/or automobile uses.
2.3. Pedestrian Infrastructure: Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** Venice Boulevard is part of the Pedestrian Enhanced District (PED). The Project proposes the following right-of-way improvements to enhance pedestrian access to, from, and around the Project Site: • The Project would provide a 15-foot setback for pedestrian and landscaped areas at grade. • Building 1 would provide a 4-foot setback at the street-facing edge along National Boulevard at grade. The Project would enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
2.10. Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also proposed. Neither loading zone would interfere with vehicles and bicycles on the surrounding street network as they will allow vehicles to pull over without blocking through traffic. Off-street loading would occur adjacent to the parking garage entrance on the Los Angeles Parcel. Access to the off-street loading is available via the Venice Boulevard driveway.
3.1. Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system.	**No Conflict.** The Project's location along a transit-rich corridor, pedestrian-oriented frontage, and proximity to existing bicycle facilities would encourage the use of active and transit modes. Further, the Project would implement a TDM Program to further reduce vehicle trips to and from the Project Site (refer to Project Design Feature TRAF-PDF-2). The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by constructing increased sidewalk and parkway widths, and planting enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
3.2. People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** The Project proposes to widen existing accessible sidewalks along Venice Boulevard and National Boulevard frontages.

Policy or Program	Would the Project Conflict?
3.3. Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services	**No Conflict.** The Project would reduce vehicle trips and vehicle miles traveled by providing employment options for a growing neighborhood residential population and creating a work destination that is easily accessible via public transportation. This Project would also reduce vehicle trips and vehicle miles traveled by implementing a voluntary TDM Program to reduce single-occupancy vehicle travel to and from the Project Site (refer to Project Design Feature TRAF-PDF-2). It would also reduce vehicle trips and VMT due to the infill nature of the Project in a walkable and developing city center environment.
3.8. Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide 175 bicycle parking spaces for employees and visitors, including short-term and long-term spaces, in compliance with the LAMC. The total required bicycle parking for the Project on both sites is 135 spaces. Therefore, the proposed bicycle parking quantity would exceed the minimum required on-site bicycle parking spaces as set by LAMC.
4.8. Transportation Demand Management Strategies: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** This policy encourages greater utilization of TDM strategies to reduce dependence on single-occupancy vehicles. The Project would support this policy by implementing a TDM Program to reduce single-occupant vehicle travel to/from the Project Site. (refer to Project Design Feature TRAF-PDF-2)
4.13. Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** LAMC Section 12.21 requires one automobile parking space for each 500 sf of combined floor area contained within the office, business, commercial, research, and development buildings, and manufacturing or industrial buildings on any lot. Building 2 on the City of Los Angeles Parcel is 369,000 sf. At a rate of one parking space per 500 sf, Building 2 is required to provide 738 parking spaces. Building 2 is located in the Venice/National TOD Subarea Parcel Group A as part of the West Adams-Baldwin Hills-Leimert CPIO; the CPIO establishes a parking maximum of 90% of the LAMC required parking spaces for the Project. Therefore, Building 2 is required to provide a maximum 664 spaces. Building 1 on the Culver City parcel is 167,000 sf. Culver City requires one parking space per 350 sf. Building 1 is required to provide 478 parking spaces. Overall, the Project is required to provide a total of 1,142 vehicle parking spaces. The Project would provide a total of 1,216 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. This total proposed parking provision exceeds the maximum onsite parking requirement as set by the CPIO by 74 spaces, if the project were located solely in Los Angeles and the CPIO area. However. the Project will meet the maximum requirement upon approval of the proposed CPIO amendment. Within the stated objective of this policy, the project is consistent; it does not dedicate surface (above ground) space to parking, and is an infill project located within an urban center that has access to jobs, housing, and non-automotive mobility options. The 74 parking spaces that exceed the maximum requirement would be a result of the full buildout of the three floors required to provide the maximum 1,142 spaces.
PK.10. Pedestrian Improvement Incentives: Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features.	**No Conflict.** To improve and incentivize pedestrian accessibility, the Project proposes pedestrian entries on National Boulevard and Venice Boulevard. Pedestrian entrances separated from vehicular driveways with curb and sidewalk would provide access from the adjacent streets, parking facilities, and transit stops. The streets immediately bordering the Project Site and all the other streets in the vicinity include sidewalks that facilitate pedestrian movement. The two pedestrian access points are located along the major frontages of the Project Site and located to minimize pedestrian-vehicle conflicts; pedestrians accessing the Project Site from the Metro “E” Line Culver City Station would not have to cross Project vehicle driveways to access the buildings.

Policy or Program	Would the Project Conflict?
PL.1. Driveway Access: Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	**No Conflict.** The Project would not add new driveways along an Avenue or Boulevard as designated by LADOT. The Project proposes a driveway adjacent to an existing driveway on Venice Boulevard. The existing driveway would be widened to accommodate the proposed driveway and would, therefore, not introduce any additional conflict points between vehicles, pedestrians, and bicyclists traveling on Venice Boulevard. The proposed driveway would be designed to comply with City standards and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. Because the Project is fronted on three sides by arterials, making use of side streets for driveways is not possible, but the Project is proposing Helms alley access on its east side.

SOURCE: Fehr & Peers, 2022.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The West Adams-Baldwin Hills-Leimert Community Plan includes several goals that are applicable to the Project. **Table 4.12-5**, *Consistency of the Project with Applicable Goals of the West Adams–Baldwin Hills–Leimert Community Plan*, provides determinations of whether the Project would conflict with any of the applicable goals in the Community Plan. As shown therein, the Project would not conflict with any of the applicable goals.

TABLE 4.12-5
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT COMMUNITY PLAN

Goal	Would the Project Conflict?
LU14: A community that conserves, enhances and regenerates its distinctive "main street" character by promoting continued pedestrian orientation of commercial areas.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
LU20: A community where residents will be able to access their daily needs by walking, biking or using other sustainable modes of transportation.	**No Conflict.** The Project would support this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk and parkway widths, and enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
LU40: A community where the economic vitality of commercial nodes, centers and transit-oriented development areas is increased by encouraging contextual new development that maximizes access to transit, jobs, goods and services, and conserves desirable community character.	**No Conflict.** The Project would support this policy as it is located in an existing, established commercial node and near the Metro "E" Line Culver City Station. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
LU43: A community that promotes economic revitalization within community commercial nodes, centers and transit-oriented development areas by ensuring enhanced pedestrian orientation.	**No Conflict.** The Project would support this policy by locating required vehicle parking within an underground structure. The Project would also support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.

Goal	Would the Project Conflict?
M2: A circulation system that supports successful neighborhood commercial areas by providing multi-modal access that accommodates public open space and gathering places, and streets that enhance sustainable watershed management.	**No Conflict.** The Project would support this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk and parkway widths, and enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
M3: A community-wide pleasant street environment that is universally accessible, safe, and convenient for pedestrians.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Pedestrian access to the Project would be provided along National Boulevard and Venice Boulevard, facing the streets and sidewalks.
M4: A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.	**No Conflict.** The Project would support this policy by providing 175 secure bicycle parking spaces, including spaces for employees and visitors, short- and long-term spaces in compliance with respective City codes. The Project will provide secure bike lockers and cages on-site as well as showers.
M5: An integrated land use and transit strategy that directs growth to areas that are accessible by transit facilities and services.	**No Conflict.** The Project would support this policy by introducing development that is conducive to walking, biking, and taking transit. The Project is located less than 600 feet from the Metro "E" Line Culver City Station and a number of existing bus lines in proximity to the Project Site that would promote convenient access between the Project and the transit system.
M9: A community where air quality and the health of residents is improved as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.	**No Conflict.** The Project's location along a transit-rich corridor, pedestrian-oriented frontage, and proximity to bicycle facilities would encourage the use of active and transit modes. Further, the Project would develop a TDM Program (refer to Project Design Feature TRAF-PDF-2) to further reduce vehicle trips to and from the Project site.

SOURCE: Fehr & Peers, 2022.

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay District

The West Adams-Baldwin Hills-Leimert CPIO includes several "purposes" that are applicable to the Project. **Table 4.12-6**, *Consistency of the Project with Applicable Purposes of the West Adams–Baldwin Hills–Leimert CPIO*, provides determinations of whether the Project would conflict with any of the applicable purposes in the CPIO. As shown therein, the Project would not conflict with any of the applicable purposes.

TABLE 4.12-6
CONSISTENCY OF THE PROJECT WITH APPLICABLE PURPOSES OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT CPIO

Purpose	Would the Project Conflict?
3.C. To foster revitalization of properties along the commercial corridors and at major intersection nodes throughout the Community Plan Area.	**No Conflict.** The Project would redevelop an existing developed site and is located in an existing, established commercial node near the Metro "E" Line Culver City Station. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station. The infill nature of the Project in a walkable and developing city center environment would also help support this purpose.
3.D. To promote and facilitate revitalization of properties that can capitalize upon close proximity to the La Brea, Farmdale, La Cienega and Culver City stations along the Mid-City Exposition Light Rail Transit Corridor (Expo Line).	**No Conflict.** The Project would redevelop an existing developed site and is located in an existing, established commercial node near the Metro "E" Line Culver City Station. The Project would also enhance pedestrian circulation and promote an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station. The infill nature of the Project in a walkable and developing city center environment would also help support this purpose.
3.I. To encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of the station area.	**No Conflict.** The Project would support this purpose as it is located in an existing, established commercial node near the Metro "E" Line Culver City Station. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
3.J. To improve the quality of life and the built environment by reducing the necessity for automobile dependence through better pedestrian orientation and conservation of prevailing neighborhood character.	**No Conflict.** The Project would support this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk and parkway widths, and enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
3.K. To improve the quality of life for all those who live, work, and recreate in the Community Plan Area by promoting safe pedestrian activity, bicycle use, and better vehicular accessibility through pedestrian orientation of structures, enhanced streetscapes and urban design, as well as conservation of the neighborhood character.	**No Conflict.** The Project would support this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk and parkway widths, and enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. Existing transit options in close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
3.M. To promote context sensitive pedestrian-oriented and transit-oriented projects, especially on greyfield and brownfield sites and other underutilized major intersection sites.	**No Conflict.** The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with connections to the Helms Bakery Complex, Ivy Station, and the Metro "E" Line Culver City Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard.
3.N. To encourage new infill development that promotes and enhances existing neighborhood character and is not dominated by excessive automobile orientation.	**No Conflict.** The Project would reduce vehicle trips and vehicle miles traveled by providing employment options for a growing neighborhood residential population and creating a work destination that is accessible via public transportation. The Project would also reduce vehicle trips and VMT by implementing a voluntary TDM Program to reduce single-occupancy vehicle travel to and from the Project Site. It would also reduce vehicle trips and vehicle miles traveled due to the infill nature of the Project in a walkable and developing city center environment.

SOURCE: Fehr & Peers, 2022.

LADOT Vision Zero

LADOT Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through multiple strategies such as modifying streets to better serve vulnerable road users. The north boundary of the Project is Venice Boulevard, which is identified as part of the High-Injury Network. The Project proposes a driveway adjacent to an existing driveway on Venice Boulevard. The existing driveway would be widened to accommodate the proposed driveway and would, therefore, not introduce any additional conflict points between vehicles, pedestrians, and bicyclists traveling on Venice Boulevard and would not preclude the City from implementing improvements associated with Vision Zero. The driveway and would be designed to meet all code requirements. Street trees and other potential impediments to driver and pedestrian visibility would be located in a manner that would maintain safe conditions near the Project driveway. Pedestrian points of entry would be provided along Venice Boulevard and National Boulevard, and bicycle parking would be provided on site. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. The loading zone would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes. Although this would still require vehicles to cross the bicycle lane, providing a dedicated and demarcated space congregates these curb demands into one area rather than occurring haphazardly at any location around the site, and following best practices, the bike lane would include "conflict zone" painting (a dashed or broken striping pattern) alerting riders and vehicles of the potential cross-over traffic. Such a curbside loading zone should have no effect on the pedestrian safety as it would not be located at or near a designated pedestrian crossing. The Project is not located in a Safe Routes to School program area. The Project would not conflict with the implementation of future Vision Zero projects in the public right-of-way, as none are currently planned on any of the nearby streets on the High Injury Network.[17]

Los Angeles Citywide Design Guidelines

The Project would not conflict with the circulation components of the Citywide Design Guidelines. The guidelines call for incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience and promoting a safe, comfortable, and accessible pedestrian experience. The Project would reduce the number of curb cuts on National Boulevard from two to one, maintain the same number of curb cuts (1) on Washington Boulevard, and proposes a driveway adjacent to an existing driveway along Venice Boulevard that would be widened to accommodate the proposed driveway. The Project would therefore not create additional conflict points between vehicles, pedestrians, and bicyclists. The Project is consistent with these guidelines.

Los Angeles Plan for a Healthy Los Angeles

The Project would not conflict with the Plan for a Healthy Los Angeles. It would reduce vehicle trips and vehicle miles traveled by providing employment options for a growing neighborhood residential population and creating a work destination that is easily accessible via public transportation. The Project would also reduce vehicle trips and vehicle miles traveled by implementing a TDM Program to reduce single-occupancy vehicle travel to and from the Project

[17] Los Angeles Department of Transportation (LADOT), Vision Zero Maps, https://ladotlivablestreets.org/programs/vision-zero/maps. Accessed June 30, 2022.

Site (refer to Project Design Feature TRAF-PDF-2). It would also reduce vehicle trips and VMT due to the infill nature of the Project in a walkable and developing city center environment.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold TRAF-2: Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?

Impact Analysis

As described above in *Methodology*, the Project is located less than 600 feet from the Metro "E" Line Culver City Station, which qualifies it for VMT screening as specified in the City's TSCG. Therefore, a VMT analysis is not required for the Project, and the Project would have a less than significant impact with respect to VMT.

While the Project is presumed to have a less than significant impact on VMT, a TDM Program is proposed by the Project (refer to Project Design Feature TRAF-PDF-2). The TDM Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking.

Mitigation Measures

Impacts regarding VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold TRAF-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis

Local Safety

Pedestrian access would be provided via widened 15-foot-wide sidewalks located along the Project Site frontages on National Boulevard and Venice Boulevard. Residents and visitors arriving at the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project Site's access locations would be designed to the City's adopted standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All three proposed Project driveways will intersect with streets (Washington Boulevard, National Boulevard, or Venice Boulevard) at right angles. The driveways will also be at-grade and flat prior to intersecting with streets. Street trees placement and other potential impediments to driver and pedestrian visibility would be located in a manner that would maintain safe conditions near the Project driveways. Pedestrian entrances separated from vehicular driveways with curb and sidewalk would provide access from the adjacent streets, parking facilities, and transit stops. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. A secondary passenger and shuttle loading zone directly south of the National Boulevard entrance is also planned. The loading zone would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes. Although this would still require vehicles to cross the bicycle lane, providing a dedicated and demarcated space congregates these curb demands into one area rather than occurring haphazardly at any location around the site, and following best practices, the bike lane would include "conflict zone" painting (a dashed or broken striping pattern) alerting riders and vehicles of the potential cross-over traffic. Such a curbside loading zone should have no effect on the pedestrian safety as it would not be located at or near a designated pedestrian crossing. The streets immediately bordering the Project Site and all the other streets in the vicinity include sidewalks, facilitating pedestrian movement. Marked crosswalks are present at all study intersections in the study area.

Vehicle access to the Project Site would be provided as follows; all three proposed driveways described below would be part of existing driveways/curb cuts:

- One commercial driveway and garage entrance from National Boulevard, with right-only turns in/out from National Boulevard
- One commercial driveway and garage entrance from Venice Boulevard onto the eastern edge of the Project Site, with right-only turns in/out from Venice Boulevard
- One driveway from Washington Boulevard, right-turn in only, leading to the Venice Boulevard garage entrance and driveway exit

Pedestrian access to the Project Site would be provided as follows:

- Pedestrian entrance on National Boulevard
- Pedestrian entrance on Venice Boulevard

The Project driveways would be designed to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040) and City of Los Angeles Bureau of Engineering Standards (S-440-4). The driveways would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The two pedestrian access points are located along the major frontages of the Project Site and located to minimize pedestrian-vehicle conflicts. Pedestrians accessing the Project Site from the Metro "E" Line Culver City Station would not have to cross Project vehicle driveways to enter the Project Site. The Project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. Therefore, the Project would cause a less-than-significant impact regarding geometric design hazards.

Freeway Safety

As noted previously, the interim guidance on freeway safety analysis requires freeway off-ramps where a proposed project would add 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. The Project is projected to add 25 or more trips to the following freeway off-ramps during both the morning and afternoon peak hours:

- I-10 Westbound Off-ramp at Robertson Boulevard
- I-10 Westbound Off-ramp at Venice Boulevard
- I-10 Westbound Off-ramp at Washington Boulevard

For the identified freeway off-ramps, a queuing study was conducted for the "Future with Project" condition for the Project buildout year (2026) using trip generation and future traffic volumes. As detailed in the Transportation Impact Study (refer to Appendix M), the projected queue lengths would not exceed the available storage lengths at any of the three studied off-ramps in either the morning or the afternoon peak hours. Although the Project is projected to add less than one car length (assuming an average queue storage length of 25 feet per car) to the morning peak hour queue at the I-10 Westbound Off-ramp at Venice Boulevard, the addition would not exceed the maximum ramp length at that location. Therefore, the Project impact on safety conditions at freeway off-ramps would be less than significant.

Mitigation Measures

Impacts related to hazardous design features were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts related to hazardous design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold TRAF-4: Would the Project result in inadequate emergency access?

Impact Analysis

The Project Site is located within an urbanized area with a fully developed roadway system. Direct emergency access is provided by each of the three streets bordering the Project Site, including Venice Boulevard, National Boulevard, and Washington Boulevard.

The Project would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. Per Project Design Feature TRAF-PDF-1, construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. Additionally, Project Design Feature TRAF-PDF-1 requires construction management meetings with the Cities of Culver City and Los Angeles and other representatives of surrounding developments if concurrent construction occurs to ensure that concurrent construction projects are managed in collaboration with one another. Furthermore, while the Project would generate construction traffic and potentially require off-site utility and roadway improvements and associated temporary lane closures along one or more of the three streets bordering the Project Site, Project construction contractors would coordinate with the fire and police departments of each city concerning any planned temporary lane closures and other construction activities that could affect emergency access and emergency response times, and arrange for traffic control devices and detours to minimize any potential impacts to traffic. Because of the short-term nature of the construction activities and with implementation of Project Design Feature TRAF-PDF-1, the Project would not result in inadequate emergency access during construction.

Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Subject to review and approval of Project Site access and circulation plans by the CCFD and LAFD, as necessary, the Project would not result in inadequate emergency access. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Project operation would result in a less than significant impact in this regard.

Mitigation Measures

Impacts regarding emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, of this Draft EIR provides a list of 52 related projects (38 in the City of Culver City and 18 in the City of Los Angeles) that are planned or are under construction within an approximately 1.5-mile radius of the Project Site. These related projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, the Project's impacts would be less than significant. The majority of the programs, plans, policies, and ordinances reviewed above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed above apply to projects individually. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by either the City of Culver City or the City of Los Angeles, depending on the related project's jurisdiction, including a review of consistency with applicable policies. Collectively, the Project and the related projects are mostly located within a SCAG-designated High Quality Transit Area[18] and would add development and density in an area with transit options and high levels of pedestrian activity. Therefore, the Project in combination with the related projects would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Similar to the Project, any related project that would be subject to environmental review would be required to evaluate VMT on a project-by-project basis. If the related project were determined to have potentially significant VMT impacts, it would be required to include appropriate mitigation measures to reduce VMT impacts to a less-than-significant level. The Project would result in a less-than-significant impact to VMT due to its proximity to the Metro "E" Line Culver City Station, as specified in the City's TSCG. As the Project would result in a less-than-significant impact on VMT, the Project would similarly result in a less than significant impact on VMT in cumulative conditions, and further analysis is not necessary.

With regard to design hazards, the Project would not result in a significant impact for geometric hazards. Each related project would be reviewed by the city with jurisdiction to ensure compliance with that City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could

[18] SCAG, High Quality Transit Areas (HQTA) 2016 – SCAG Region, February 22, 2021, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explore?location=34.018594%2C-118.361387%2C13.12. Accessed June 30, 2022.

potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

Under LADOT's Interim Guidance for Freeway Safety Analysis, a project would not have the potential to result in significant cumulative freeway safety impact unless it would add 25 or more trips to any off ramp in either the morning or afternoon peak hour in the future horizon year (i.e., Year 2045). As the Project trips would not exceed this screening threshold at any area off ramps, the Project's impacts to freeway safety would be less than significant, and the Project would not make a considerable contribution to cumulative freeway safety impacts.

With regard to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Pursuant to California Vehicle Code Section 21806, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, related projects would implement a Construction Management Plan or similarly be required to accommodate emergency access through the issuance of encroachment permits (for any work conducted in a public roadway right-of-way) and/or approval of traffic control plans by the city with jurisdiction to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. Furthermore, each of the related projects would be required to coordinate with CCFD, CCPD, LAFD, and LAPD for site plan reviews and to ensure that emergency access is maintained at all times.

As such, cumulative impacts on transportation would be less than significant.

Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts on transportation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.13 Tribal Cultural Resources

4.13.1 Introduction

This section evaluates potential impacts on tribal cultural resources. The analysis is based on a Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC), consultations between the City and Native American tribes pursuant to Assembly Bill (AB) 52, as well as the *Crossings Campus – Archaeological Resources Assessment Report* (Archaeological Report) prepared by ESA,[1] that is provided in Appendix D of this Draft EIR. Native American consultation documentation related to AB 52 consultations is provided in Appendix N of this Draft EIR.

4.13.2 Environmental Setting

Regulatory Framework

The following describes the primary State regulatory requirement (AB 52) regarding tribal cultural resources.

Assembly Bill 52

AB 52 was approved on September 25, 2014. The act amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American Tribes early in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria of subdivision (a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing

[1] Environmental Science Associates, Crossings Campus, Culver City and City of Los Angeles, California, Archaeological Resources Assessment Report, prepared for Culver Crossings Properties LLC, July 2022. Provided in Appendix D of this Draft EIR.

to be informed by the lead agency of projects within their geographic area of concern.[2] Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.[3]

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[4]

In addition to other CEQA provisions, the lead agency may certify an EIR or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.[5]

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is 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 without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information 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.

Confidentiality does not apply to data or information that are, or become, publicly available, are already in lawful possession of the applicant before the provision of the information by the California Native American tribe, are independently developed by the applicant or the applicant's agents, or are lawfully obtained by the applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.[6]

2 Public Resources Code, Section 21080.3.1(b) and (c).
3 Public Resources Code, Sections 21080.3.1(d) and 21080.3.1(e)
4 Public Resources Code, Section 21080.3.2(b)
5 Public Resources Code, Section 21082.3(d)(2) and (3)
6 Public Resources Code, Section 21082.3(c)(2)(B).

Existing Conditions

Project Site

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. Geotechnologies, Inc. drilled several borings in June and August 2021 within portions of the Project Site down to a depth of 80 feet and 90 feet below existing grade, including the excavation of test pits down to depth of 10 and 20 feet below existing grade.[7] The results of these investigations revealed that fill was found from the surface down to approximately 3 and 11.5 feet below existing grade, respectively. The fill was underlain by native alluvial soils consisting of sand, silt, and clay with varying composition.

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina[8]. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.[9] The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.[10]

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino.[11] Coming ashore near Malibu Lagoon

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7 Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Los Angeles, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022. Provided as Appendix F of this Draft EIR.

8 A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

9 Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

10 A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

11 Wallace, William J. A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214-230, 1955.

or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism.[12]

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.[13] The closest named settlements to the Project Site are *Saa'anga* and *Waachnga.* Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley[14] indicates that the settlement of *Saa'anga* was located approximately 2.15 miles southeast of the Project Site, while the settlement of *Waachnga* was situated approximately 4.35 miles south. Both of these settlements are depicted as located close to Ballona Creek.

South Central Coastal Information Center Records Search and Other Archival Research

As noted in the Archaeological Report, archival research was conducted for the Project, which included a records search at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC). The records search included a review of all recorded cultural resources and previous cultural resource studies within the Project Site and a 0.50-mile radius. The records search results indicate that eight cultural resources studies have been conducted within a 0.50-mile radius of the Project Site, but none overlap with the Project Site. In addition, a total of eight cultural resources have been recorded within the 0.50-mile radius. Of these eight resources, one is a multicomponent resource (including both historic architectural and historic archaeological components) (CA-LAN-3803); one is a historic period archaeological resource (CA-LAN-4829); and six are historic architectural resources (P-19-162271, -175298, -177336, -177338, -186673, and -187052). None of these resources are located within the Project Site; however, one (CA-LAN-4829) is located within 100 feet of the Project Site.

Additional archaeological resources (the report for which have not yet been archived at the CHRIS-SCCIC as it is still in progress) were identified approximately 0.40 mile from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City.[15] These include two isolated prehistoric metates and three isolated historic-period artifacts (glass bottle containers for soda and liquor). The two isolated prehistoric metates were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. The three isolated historic-period artifacts were recovered during construction of an adjacent development project (immediately to the south) in the upper five feet of disturbed fill sediments.[16] The report for the adjacent development project has

[12] Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

[13] Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

[14] McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, (Malki Museum Press, Banning, California, 1996).

[15] ESA, (*in progress*) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California, 2022. Report on file with ESA, Irvine, CA.

[16] ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

also yet to be submitted to the CHRIS-SCCIC to be archived. Both of these properties had a similar land use history as the Project Site.

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. On October 18, 2021, the NAHC was contacted to request a search of the SLF. The NAHC responded to the request in a letter dated November 29, 2021, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area.

Assembly Bill 52 Tribal Consultation

The City submitted notification and request to consult letters to seven individuals and organizations on November 18, 2021, pursuant to AB 52. In particular, AB 52 letters were sent via certified mail to the following California Native American tribes and individuals:

- Sandonne Goad and Samuel Dunlap, Gabrielino/Tongva Nation
- Charles Alvarez, Gabrielino-Tongva Tribe
- Andrew Salas, Gabrieleño Band of Mission Indians—Kizh Nation
- Robert Dorame, Gabrielino Tongva Indians of California Tribal Council
- Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians
- Scott Cozart, Soboba Band of Luiseño Indians
- Lovina Redner, Santa Rosa Band of Cahuilla Indians

The City received a letter response on December 1, 2021, from the Gabrieleño Band of Mission Indians–Kizh Nation (Tribe) requesting consultation on the Project. The City subsequently scheduled a conference call with the Tribe on February 22, 2022. During this meeting, the Tribe indicated that the Project Site has a high sensitivity for the presence of tribal cultural resources, because many trade routes existed around the Project Site and also because the Project Site is situated within the sacred community of *Huachongna*. The Tribe indicated that this sacred community was located on land that is now part of the City of Culver City.

On March 17, 2022, the Tribe provided the City with digital materials including screenshots of topographic maps and electronic documents (some of which also include screenshots) that were referenced during the consultation. The topographic maps are from 1881 and 1898 depicting the general location of the Project Site (unknown source), and the Kirkman-Harriman Pictorial and Historical Map of Los Angeles County (1938). The electronic documents included: screenshots of *California's Gabrielino Indians* (1962) book identifying general information on La Ballona in Culver City and the term *Gaucho* (also referred to as *Huacho*); a screenshot of information (source unknown) on where villages were located (coast, valleys, and desert); and a screenshot of information on Rancho La Ballona (source unknown). Additional electronic documents include: the SCCIC's letter regarding archaeological sensitivity of a project area when resources are not previously recorded; a letter from Environmental Research Archaeologists providing their

professional opinion regarding site surveys; an email from the NAHC indicating that a negative SLF search does not preclude the existence of resources within a project site; the definition of tribal cultural resources on the Tribe's letterhead; and mitigation measures on tribal cultural resources proposed by the Tribe. These digital materials did not identify any tribal cultural resources within the Project Site. In their email correspondence to the City on March 17, 2022, the Tribe requested for the City to provide any and all information regarding the history of the subsurface soils within the Project Site.

On April 14, 2022, the City submitted a close of consultation letter to the Tribe that included the City's proposed mitigation measures for Native American construction monitoring. On April 20, 2022, the Tribe responded that they disagreed with the proposed mitigation measures and provided their own mitigation measures for Native American monitoring that were the same measures that were provided to the City on March 17, 2022. The City subsequently revised the proposed mitigation measures and submitted them to the Tribe on July 7, 2022 along with a letter indicating that these revised measures would be included in this Draft EIR.

The AB 52 Native American notification letters and documentation related to consultations between the City and the Kizh Nation are provided in Appendix N of this Draft EIR. The City has not received any other responses from the Native American community.

4.13.3 Project Impacts

Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the CEQA Guidelines. Accordingly, a significant impact to tribal cultural resources would occur if:

- **TCR-1:** The Project would 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.

Methodology

The analysis is based on a SLF search conducted by the NAHC, consultations between the City and Native American tribes pursuant to AB 52, as well as the Archaeological Report prepared by ESA. Specifically, the City submitted notification and request to consult letters to Native American individuals and organizations and conducted follow-up Native American consultation.

Project Design Features

There are no project design features relative to tribal cultural resources.

Analysis of Project Impacts

Threshold TCR-1: The Project would result in a significant tribal cultural resources impact if it would 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.

Impact Analysis

As discussed in the Archaeological Report, no known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. However, two prehistoric metate artifacts were recently encountered by archaeologists during construction and redevelopment of a project near Downtown Culver City (within 0.40-mile radius of the Project Site). These resources were found within disturbed fill sediments at properties that had a similar land use history as the Project Site. The SLF search conducted through the NAHC indicated that the Project Site was negative for known resources in the SLF database. The results of several geotechnical investigations at the Project Site revealed that fill was found from the surface down to approximately 3 and 11.5 feet below existing grade. The fill was underlain by native alluvial soils consisting of sand, silt, and clay with varying composition.

Per review of Kirkman's 1938 map that was provided to the City from Kizh Nation, the Project Site is depicted as located in the vicinity of old/ancient roads and northwest of Ballona Creek; however, no Native American villages are observed as located within the Project Site. The closest unnamed village to the Project Site is shown in the 1938 map as located southeast of Ballona Creek and the Project Site (approximately 0.30 miles southeast). Additionally, no villages with the name of *Huachongna* were observed in the 1938 map. A screenshot of a book titled *California's Gabrielino Indians* (1962) identifies the term *Gaucho/Huacho* (possibly in reference to *Huachongna*), which according to the text it is a Native American term for the cliffs of Ballona's easterly boundary. However, no additional information is provided in the text as to the exact location of *Gaucho/Huacho*. As a result, specific evidence of village locations located within or overlapping the Project Site was not provided. Therefore, no known tribal cultural resources, as defined in PRC Sections 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of AB 52 consultation, or as a result of the SLF search through the NAHC and the SCCIC.

However, due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and Ballona Creek, the Project Site's location in the general vicinity of an unnamed village (located approximately 0.30 miles southeast), and given recent discoveries during other construction projects in the vicinity, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, there is potential that the Project could cause a substantial adverse change in the significance of a tribal cultural resource as described in PRC Section 21084.2. Accordingly, impacts on tribal cultural resources are considered potentially significant, and mitigation measures are provided below.

Mitigation Measures

Refer to Mitigation Measure CUL-MM-2. The following mitigation measures are also required to address potentially significant impacts to tribal cultural resources during Project construction:

> **TCR-MM-1:** Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project.
>
> Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.
>
> Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.
>
> **TCR-MM-2:** The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human

remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.

The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public,

non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).

Level of Significance after Mitigation

In the event unknown tribal cultural resources are unearthed during construction of the Project, with implementation of the above mitigation measures, potentially significant impacts on tribal cultural resources would be reduced to a less than significant level.

Cumulative Impacts

Impact Analysis

As demonstrated above, prior to mitigation, the Project would have a potentially significant impact on tribal cultural resources even though there are no resources listed or determined eligible for listing, on the national, State, or local register of historical resources, and the Lead Agency determined that no resources were identified during AB 52 tribal consultation that are eligible for listing under the criteria in PRC Section 5024.1(c). This significant impact finding is due to the potential to encounter tribal cultural resources at depth during construction. This potential exists due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and Ballona Creek, the Project Site's location in the general vicinity of an unnamed village (located approximately 0.30 miles southeast), and given recent discoveries during other construction projects in the vicinity.

As with the Project, each related project would also be required to engage in AB 52 consultation with Native American tribes in order to identify any tribal cultural resources that could potentially be impacted by the related project and to address potentially significant impacts, if identified. The related projects may require mitigation similar to that applicable to the Project, especially if those related projects are in areas of heightened sensitivity similar to the Project Site.

Accordingly, in light of the Project's mitigation measures and similar anticipated mitigation requirements for Projects in areas of heightened sensitivity, the Project's contribution to cumulative impacts regarding tribal cultural resources would not be cumulatively considerable and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding tribal cultural resources were determined to be less than significant without mitigation. Therefore, no additional mitigation measures to address cumulative impacts are required.

Level of Significance after Mitigation

Cumulative impacts regarding tribal cultural resources would be less than significant without mitigation.

4.14 Utilities and Service Systems

4.14.1 Water Supply

4.14.1.1 Introduction

This section evaluates potential Project impacts on water supply and whether the Project would require or result in the construction of new water treatment facilities, including conveyance infrastructure, the construction of which would cause significant environmental effects. The Golden State Water Company (GSWC) is the water supplier for the Culver City Parcel and the Los Angeles Department of Water and Power (LADWP) is the water supplier for the Los Angeles Parcel. This section describes GSWC's and LADWP's available water supplies, current and projected regional water demand, municipal water infrastructure serving the Project Site, and the adequacy of water supplies and infrastructure to meet Project demand. Project consistency with relevant plans and regulations is also assessed.

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Culver City Parcel (WSA-Culver City Parcel) and adopted by GSWC; and a WSA prepared for the Los Angeles Parcel (WSA-Los Angeles Parcel) and adopted by LADWP. Both WSAs are included in Appendix O of this Draft EIR. Additional technical information used in the analysis is based the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared for the Project by KPFF Consulting Engineers, dated April 2022 and is included as Appendix P of this Draft EIR.

4.14.1.2 Environmental Setting

Regulatory Framework

There are several plans, policies, and programs regarding water supply at the state, regional, and local levels. Described below, these include the following:

- California Urban Water Management Planning Act
- Senate Bill 610, Senate Bill 221, and Senate Bill 7
- Senate Bill X7-7 – Water Conservation Act
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
- Executive Order B-37-16
- Executive Order B-40-17
- Executive Order N-10-21
- Executive Order 7-77
- Metropolitan Water District 2020 Urban Water Management Plan
- 2015 Integrated Resources Plan
- Water Surplus and Drought Management Plan

- Long-term Conservation Plan
- Water Supply Allocation Plan
- West Basin Municipal Water District 2020 Urban Water Management Plan
- Culver City General Plan
- Culver City Municipal Code
- Culver City Service Area Urban Water Management Plan
- Los Angeles West Adams–Baldwin Hills–Leimert Community Plan
- Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
- Los Angeles Green New Deal
- Los Angeles One Water LA 2040 Plan
- Los Angeles General Plan Framework Element,

State

California Urban Water Management Planning Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water to customers.

Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the State laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for WSAs and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 sf of floor space;

- Commercial office buildings employing more than 1,000 persons or having more than 250,000 sf of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

The WSA must be approved by the public water supplier serving the project and incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA. As discussed under Methodology, below, the Project meets the above criteria for commercial office space, and, therefore, a WSA is required.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221-required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households." Since the Project is not a residential subdivision, it is not subject to SB 221.

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[1] As such, each updated UWMP must now incorporate a description of how each respective urban water

[1] California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.

supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[2] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[3] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[4]

Sustainable Groundwater Management Act of 2014[5]

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[6] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

California Code of Regulations

Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures,

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2 State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, February Conservation Summary, updated April 4, 2017.

3 State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.

4 State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, August Urban Water Production Summary, updated October 3, 2017.

5 Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2019.

6 California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed April 2022.

including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi); and lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[7]

CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2020.

Executive Order B-37-16

In 2018 the California State Legislature enacted two policy bills: SB 606 and Assembly Bill (AB) 1168 to establish a new foundation for long-term improvements in water conservation goals and drought planning to adapt to the longer and more intense droughts climate change is causing in California.

Collectively, these efforts provide a road map for all Californians to work together to ensure that we will have enough water now and in the future. The 2018 legislation applies to the actions of the California Department of Water Resources (DWR), the California State Water Resources Control Board (SWRCB), and water suppliers. DWR and the SWRCB will work closely together to develop new standards for:

- Indoor residential water use standard will be 55 gallons per capita daily until January 2025; the standard will become stronger over time, decreasing to 50 gallons per capita daily in January 2030. For the water use objective, the indoor use is aggregated across population in an urban water supplier's service area, not each household;

[7] California Code of Regulations, Title 20, Section 1605.3(h).

- Outdoor residential water use standard will be based on land cover [landscaping], climate, and other factors, i.e., geography, pastures and other irrigated lands, or open space determined by the DWR and the SWRCB. The SWRCB will adopt the outdoor standard by June 2022;
- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters; and
- System water losses, formerly known as unaccounted for water.

Urban water suppliers must stay within annual water budgets based on these standards for their service areas. The 2018 legislation also supports drought planning. In urban areas, drought plans will be primarily led by local water suppliers. DWR and the SWRCB will develop recommendations to strengthen drought planning in rural areas and areas served by small water systems by coordinating with counties and other stakeholders.

Executive Order B-40-17

Executive Order (EO) B-40-17 was issued on April 7, 2017. Cities and water districts throughout the State are required to report their water use each month and bans wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15% from 2020 usage levels. The Order lists common sense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress.

Executive Order 7-77

On March 28, 2022, Governor Newsom issued Executive Order No. 7-77 (EO), meant to provide guidance on emergency drought relief. The EO states that the "21st century to date has been characterized by record warmth and predominantly dry conditions, and the 2021 meteorological summer in California and the rest of the western United States was the hottest on record" and "the ongoing drought will have significant, immediate impacts on communities with vulnerable water supplies, farms that rely on irrigation to grow food and fiber, and fish and wildlife that rely on stream flows and cool water."

Within the EO, the Governor ordered the SWRCB to evaluate the adoption of regulations and the relaxations of permitting for drought positive measures. These regulations include banning irrigation of "non-functional" turf (or grass), such as decorative grass adjacent to large industrial and commercial buildings. The ban would not include residential lawns or grass used for recreation, such as school fields, sports fields and parks. Further, the EO asks the SWRCB to prepare municipal water agencies for drought restrictive measures. More specifically, the SWRCB asks these urban water suppliers to prepare to activate, at a minimum, Level 2 of their customized Water Shortage Contingency Plans. These plans are developed by local water agencies to navigate extreme drought and each plan is customized based on an agency's unique infrastructure and management. Triggering Level 2 of these plans involves implementing water conservation actions to prepare for a water shortage level of up to 20 percent.

Regional

Metropolitan Water District 2020 Urban Water Management Plan

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City of Culver City and City of Los Angeles.

MWD's 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[8] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, i.e. under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 UWMP.[9] The analysis in the 2020 UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[10] In the 2020 UWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.[11]

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.[12] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-

8 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.
9 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
10 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
11 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
12 Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016.

quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply, and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[13]

As of March 2022, the 2020 IRP planning process is in development. The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. Refer to the *Existing Conditions* subsection below for additional information on the scenarios being evaluated as part of the 2020 IRP.

Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could

[13] Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016, p. VIII.

be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[14]

Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 consecutive months from July of a given year through the following June.

West Basin Municipal Water District 2020 Urban Water Management Plan

The West Basin Municipal Water District (WBMWD) was established in 1947 to mitigate over-pumping in the West Coast Subbasin. WBMWD is the fourth-largest member agency of the MWD and undertakes actions to protect groundwater supplies from seawater intrusion and augment the West Coast Subbasin supplies. The WBMWD imports water from MWD and delivers these supplies to investor-owned utilities, municipalities, a county waterworks district, and a groundwater agency to supplement locally available supplies.

As described in its most recent 2020 UWMP, WBMWD has an approximately 185-square-mile service area and provides wholesale potable water to 17 cities through three investor-owned utilities, four municipal water departments and one county waterworks district, in southwest Los Angeles County. WBMWD supplies recycled water to over 450 metered connections for municipal, commercial, and industrial use as well as for injection into the West Coast Basin Seawater Barrier to halt seawater intrusion and replenish the WCGB aquifers.[15]

WBMWD has been able to support the diversification of supplies available to its customer agencies by providing access to imported water supplies from MWD, as well as primarily through the development of recycled water supplies and conservation. These supplies are served directly to its

[14] Water Surplus and Drought Management Plan, Report No. 1150, 1999.
[15] West Basin Municipal Water District, 2020 Urban Water Management Plan, June 28, 2021, p. ES-3.

customer agencies and indirectly as the replenishment supplies necessary to maintain groundwater production. WBMWD is projected to increase current recycled water supplies as well as invest in ocean water desalination supply.

Local

City of Culver City

Culver City General Plan

The General Plan Conservation Element (1972) does not address water supply or further water conservation measures.

Culver City Municipal Code

The City's policies regarding water supply are set forth in CCMC Chapter 5.03, Water Conservation and Water Supply Shortage Program. The purpose of this chapter is to adopt and enforce a conservation and supply shortage program as necessary to manage the City's potable water supply in the short- and long-term, and to avoid or minimize the effects of drought and shortage within the City. According to Chapter 5.03.C, careful water management that includes active water conservation measures not only in times of drought, but at all times, is essential to ensure a reliable minimum supply of water to meet current and future water supply needs.[16]

The water conservation and supply shortage program established under Chapter 5.03, is intended to reduce water consumption through conservation, and to enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water within the City to avoid and minimize the effect and hardship of water shortage to the greatest extent possible.

Under Section 5.03.030, permanent water conservation requirements and prohibition against waste include limits on watering hours (Section 5.03.030.A), which prohibit watering or irrigating of lawn, landscape or other vegetated area with potable water between the hours of 8:00 A.M. and 7:00 P.M.; limit on watering duration (Section 5.03.030.B), which limit watering to no more than 10 minutes of watering per day, per station; prevention of excessive water flow or runoff (Section 5.03.030.C); and prohibition of washing down hard or paved surfaces (Section 5.03.030.D). Other measures (Section 5.03.030.E through O) include the obligation to fix leaks, breaks or malfunctions (Section 5.03.030.E); required re-circulation of water for decorative water fountains and decorative water features (Section 5.03.030.F), and prohibition of single-pass cooling systems (Section 5.03.030.J). The Code also requires that all pools and spas must be covered in a manner to reduce evaporation (Section 5.03.030.N) and prohibit irrigation of ornamental turf on public street medians Section 5.03.030.O).

Sections 5.03.035, 5.03.040, and 5.03.045, respectively, pertain to Level 1, Level 2, and Level 3 water supply shortage emergency conditions. The stages are cumulative and include permanent measures as well as measures from the preceding level. Level 1 water supply shortage requires additional water conservation measures including limits on water days; a 72-hour time limit on repairs of leak, breaks or malfunctions. Level 2 requires more stringent limits on watering days, a 48-hour time limit on repairs of leak, breaks or malfunction; prohibition on filling ornamental lakes

16 City of Culver City, Municipal Code, Chapter 5.03.

or ponds (except under specified conditions); and limits on washing vehicles at commercial car washing facilities. The use of potable water to wash or clean a vehicle, whether motorized or not, is prohibited at a commercial car washing facility that does not utilize a re-circulating water system. Level 3 prohibits watering or irrigating, unless maintenance of vegetation, including trees and shrubs, are watered with a hand-held bucket or similar container or a hand-held hose equipped with a positive, self-closing, water-shut-off nozzle or device. Maintenance of existing landscape necessary for fire protection, erosion control, or protection of protected species or certain other landscaped areas, such as public parks and playing fields, is allowed provided that such irrigation does not exceed two days per week and is conducted in accordance with the time restrictions. Level 3 also requires that all leaks, breaks, or other malfunctions in the water user's plumbing or distribution system be repaired within 24 hours of notification. At present, Culver City is observing Level 1 water restrictions.

Culver City Service Area Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. GSWC recently approved the Culver City Service Area 2020 UWMP (UWMP-Culver City) on June 15, 2021. The UWMP-Culver City describe GSWC's water supply reliability under single dry-year, multiple dry-year, and average year conditions, with projected information in 5-year increments for a minimum of 20 years.

It is also acknowledged that GSWC service areas are in Stage 1 of the Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing plan.[17] In Stage 1, customers are encouraged to voluntarily reduce usage by 15% (compared to 2020) and limit outdoor irrigation/watering to no more than three days per week between the hours of 7 PM–8 AM. Addresses ending in an even number must water only on: Sunday, Wednesday, or Friday. Addresses ending in an odd number must water only on: Tuesday, Thursday, or Saturday.

City of Los Angeles

Los Angeles West Adams–Baldwin Hills–Leimert Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. With regard to water supply, the West Adams–Baldwin Hills–Leimert Community Plan includes the following policies:

> **CF16-1: Water Distribution System.** Support the appropriate expansion, upgrade, and/or improvement of the local water distribution system.

[17] City of Culver City website, Water Conservation, https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Water-Conservation. Accessed July 13, 2022.

CF16-2: Alternative Water Supplies. Support the development of reliable cost-effective sources of alternative water supplies, including opportunities for groundwater recharge, water reclamation, and exchanges and transfers.

CF16-4: Water Conservation. Continue to require water conservation measures, as recommended by LADWP.

Los Angeles Municipal Code

The City of Los Angeles has adopted several ordinances, later codified in the Los Angeles Municipal Code (LAMC), in an effort to reduce water consumption. A summary of the City's key regulations regarding water conservation is provided below.

- Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.
- Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreen Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.
- Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.
- Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 sf, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 sf of cumulative landscaped area, weather or soil moisture–based irrigation controllers and sensors be installed.
- Ordinance No. 184,692—amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.
- Ordinance No. 184,248—amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish Citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 sf of land with 300-foot

distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

Los Angeles Department of Water and Power's 2020 Urban Water Management Plan (UWMP)

LADWP adopted the 2020 UWMP on May 25, 2021. The 2020 UWMP serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2045. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Los Angeles Green New Deal

The City released the first Sustainable City pLAn in April 2015,[18] which has been updated in 2019 as the City's Green New Deal. The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

Los Angeles One Water LA 2040 Plan

The General Plan Conservation Element (1972) describes water pollution as a continuing problem, In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[19] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024. [20] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

Los Angeles General Plan Framework Element

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[21] The Framework Element sets forth a comprehensive Citywide

[18] City of Los Angeles, Sustainable City pLAn, April 2015.

[19] City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

[20] City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

[21] City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City's Framework Element identifies goals, objectives, and policies for City utilities including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[22] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

Relevant goals, objectives, and policies of the Framework Element related to water supply are provided in **Table 4.14.1-1**, *Relevant General Plan Framework Element Utilities and Service Systems Goals, Objectives, and Policies*. The following General Plan goals, objectives and policies relate to water supply.

TABLE 4.14.1-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT UTILITIES AND SERVICE SYSTEMS GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

Existing Conditions

Water Infrastructure

The Project Site is unique in that GSWC and LADWP provide potable water service to the Project Site. GSWC maintains water infrastructure to the Culver City Parcel of the Project Site. Based on

[22] City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Water Supply, originally adopted December 11, 1996, and readopted August 8, 2001.

information provided by GSWC, there is an 8-inch water main in National Boulevard and a 16-inch water main in Washington Boulevard. There is an existing water service connection from the main on National Boulevard at the signalized intersection at Ivy Station. The nearest hydrants to the Culver City Parcel that are served by GSWC are located at the Ivy Station development approximately 170 feet north of Washington Boulevard, and on Washington Boulevard approximately 215 feet east of the intersection at National Boulevard.

LADWP maintains water infrastructure to the Los Angeles Parcel. Based on available record data provided by LADWP, there is an 8-inch water main within the Venice Boulevard sidewalk approximately 15 feet north of the property line. This water main is serving two existing hydrants on Venice Boulevard approximately 88 feet and 348 feet east of the intersection at National Boulevard. Per LADWP record drawings, there are three water service connections coming from Venice Boulevard: 1-inch domestic, 3-inch domestic, and 8-inch fire service.

Water Demand

The Project Site is currently improved with single-story 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, street edge, and building perimeter planting.

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. According to the WSA-Culver City Parcel, from 2017 to 2021 water use on the Culver City Parcel averaged 14 hundred cubic feet (CCF) or 0.033 AFY, with a maximum annual use over this period of 26 CCF or 0.060 AFY.

The Los Angeles Parcel is currently improved with an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. In addition to the floor area, there are 70 spaces of enclosed vehicular parking. Per the WSA-Los Angeles Parcel, the existing water demand for the Los Angeles Parcel is 2,795 gpd or 3.13 AFY.

Water Supply

Gold State Water Company – Culver City Service Area

This section identifies the water supplies for the Culver City service area and discusses the variability of the different supplies based on drought and other factors affecting water supply reliability. The water supply for the Culver City service area is mostly imported water purchased from the WBMWD, which is a member agency of MWD. While approximately 0.1 AF of groundwater was pumped from the Santa Monica Subbasin (DWR Basin No. 4-011.01) in 2020 by the GSWC, no groundwater was used in 2021 nor is groundwater projected for use within the Culver City service area through the 2045 planning horizon. As such, further discussion of groundwater supplies are not included in this Draft EIR section. Refer to the WSA-Culver City Parcel report for additional details on the underlying Santa Monica Subbasin.

Per the WSA – Culver City Parcel, in 2021, the WBMWD provided GSWC's Culver City service area a total of 4,726 acre-feet, which sufficiently met the Culver City service area total water demand.

The water purchased from WBMWD may be managed and moved between the GSWC Culver City service area and GSWC Southwest service area, depending upon the circumstances for supply availability in each particular service area.[23]

GSWC entered into a 5-year purchase agreement between GSWC and WBMWD, effective January 1, 2008, through December 31, 2012. The agreement was extended an additional two years to December 31, 2014. This agreement provided GSWC with an annual maximum allocation of 30,651 AFY with a total purchase commitment of 91,953 AF over the 5-year term of the agreement, shared by all of GSWC's systems served by WBMWD.

WBMWD entered into a new 10-year term purchase order with MWD effective January 1, 2015, through December 31, 2024. For the first 5 years of the new purchase order term, MWD staff recommended to not enter into agreements with its customer agencies.

WBMWD acts as secondary wholesale water agency, purchasing water from MWD and reselling it to GSWC. MWD supplies imported water sourced from the SWP and the Colorado River via a series of pipelines and aqueducts.

The Colorado River was MWD's original source of water following its establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the United States Secretary of the Interior. The Colorado River Aqueduct, which has a capacity of 1.25 million AFY, is owned and operated by MWD. It transports water from Lake Havasu, at the border of California and Arizona, approximately 242 miles west to its terminus at Lake Mathews in Riverside County and MWD's service area.

MWD also imports water from the SWP, which is owned by the State of California and operated by DWR. This project transports Feather River water stored in and released from Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-Delta, south via the California Aqueduct to four delivery points: one from the California Aqueduct's West Branch at Castaic Lake and three from the East Branch along the northeastern portion of MWD's service area between Devil's Canyon Power Plant and Lake Perris.

MWD's 2015 IRP details a series of reliability goals, approaches, and targets for each of their water resource areas, with some focus on maintaining existing capabilities and increasing net quantities over the 25-year planning horizon . The goals identified are:

- Maintain Colorado River Aqueduct supplies;
- Stabilize state Water Project supplies;
- Achieve additional conservation savings; and
- Develop and protect local water supplies.

[23] The Southwest Service Area currently includes 54,994 customers in Southwest Los Angeles County, including all of Gardena and Lawndale, and portions of Carson, Compton, El Segundo, Hawthorne, Inglewood, Redondo Beach, and unincorporated Athens, Del Aire, El Camino Village, Lennox and Gardena Heights. Source: Golden State Water Company, https://www.gswater.com/southwest#:~:text=We%20currently%20serve%2054%2C994%20customers,Village%2C%20Lennox%20and%20Gardena%20Heights. Accessed July 13, 2022.

MWD published annual implementation reports on its progress towards the 2015 IRP goals. The most recent Implementation Report (2019)[24] highlights the progress on achieving the above resource and reliability goals established in the 2015 IRP as follows:

- MWD has worked closely with other agencies to improve reliability of its imported water supplies. MWD led efforts in crafting the Lower Colorado River Basin Drought Contingency Plan and supported efforts to make the Delta more resilient and support Governor Newsom's new direction to advance a single tunnel solution in the Delta.
- MWD continues to support and encourage local supply development through the Local Resources Program. MWD's board approved three projects with a total contract yield of 3,660 acre-feet per year from January 2019 to date. Seven additional applications for a total of 116,580 acre-feet per year are under consideration. MWD is also assessing the water supply benefits from stormwater through pilot programs.
- MWD continues to inform residents of water use efficiency through ongoing advertising campaigns and education. In addition to rebates for water efficient fixtures, MWD also implements programs targeting outdoor conservation with its landscape education and turf replacement programs. In 2019, MWD's board approved a conservation initiative that focuses on reaching disadvantaged communities.

The 2020 IRP is a two-phase process including a Regional Needs Assessment (Phase 1) and a One Water Implementation phase (Phase 2). The Draft Regional Needs Assessment was recently completed, and includes the analysis of regional needs under a range of scenarios: (1) Scenario A, low demand and stable imports, (2) Scenario B, high demand and stable imports, (3) Scenario C, low demand and reduced imports, and (4) Scenario D, high demand and reduced imports (MWD, 2022). The Draft Regional Needs Assessment found plausible reliability outcomes by the year 2045, with potential shortages ranging from no net shortage at all under Scenario A to as high as 1.2 million acre-feet under Scenario D, and identifies needs and opportunities related to five focus areas: (1) SWP dependent areas, (2) storage, (3) retail demand/ demand management, (4) MWD imported supplies, and (5) local supply. The Draft Regional Needs Assessment concludes that "Collectively, these findings instill a sense of optimism about Southern California's water future. Metropolitan has identified the tools necessary to adapt to a variety of plausible futures successfully. It is also well within Southern California's control to avoid a fate with increased per-capita water use and higher demands that would prove unsustainable." It further notes that through the One Water Phase of the process, "the precise combination of actions will emerge as more is known about the future that we actually face. Southern California is poised to be agile enough to adjust its portfolio of water actions to keep up with our changing times."

As an additional acknowledgment, recycled water is not served to customers within the Culver City service area and is not expected to supply the Project. It is noted, however, that wastewater generated within the service area is treated by the City of Los Angeles, and a portion of that treated wastewater is sold to WBMWD for further treatment for recycled water uses throughout the WBMWD service area. Although the Culver City service area does not directly utilize recycled

[24] Metropolitan Water District of Southern California, Report on Integrated Water Resources Plan (IRP) Implementation, October 8, 2019.

water, its customers contribute to the regional water supply reliability benefit achieved through WBMWD's distribution of recycled water.

Los Angeles Department of Water and Power

The Los Angeles Aqueduct (LAA), local groundwater, purchased water from MWD, and recycled water are the primary sources of water supplies for the City. **Table 4.14.1-2**, *LADWP Water Supply*, shows LADWP water supplies from Fiscal Year Ending (FYE) 2017 to FYE 2021 from these sources.

TABLE 4.14.1-2
LADWP WATER SUPPLY

Fiscal Year Ending	Los Angeles Aqueducts (AF)	Local Groundwater	MWD (AF)	Recycled Water (AF)	Transfer, Spread, Spills & Storage (AF)	Total (AF)
2017	224,724	50,439	216,299	8,032	9,350	490,144
2018	307,671	21,760	182,706	9,778	-200	522,116
2019	312,456	32,233	137,775	7,512	1,710	488,266
2020	292,095	34,363	152,647	9,641	1,155	487,591
2021	128,268	51,070	316,627	11,455	-938	508,359

NOTE: Metropolitan Water District of Southern California = MWD; AF = acre-feet.
SOURCE: LADWP, 2022.

Los Angeles Aqueduct

The City of Los Angeles receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the LAA. LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. In 1940, the LAA was extended 40 miles north from the Owens River to the Mono Basin. To meet additional water demands from the City, a second barrel, also known as the Second LAA, was constructed and completed in 1970. The second LAA increased the City's capacity to deliver water from the Mono Basin and the Owens Valley from 485 cubic feet per second (cfs) to 775 cfs.

The City's water rights in the Eastern Sierra Nevada are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley. The most significant basis for export of surface water from the Eastern Sierra Nevada is an appropriation claim in 1905 to divert up to 50,000 miner's inches (1,250 cfs) from the Owens River. Up to 16,000 AFY can be supplied from Mono Basin, which is permitted by the 1994 Mono Lake Basin Water Right Decision 1631. Decision 1631 set a limit on LADWP water exports from the Mono Basin, which were set to a range of 0 to 16,000 AFY based on Mono Lake's water elevation. Aside from the primary surface water rights, the groundwater right in the Owens Valley is managed under the 1991 Long Term Water Agreement (LTWA) and uses vegetation water demand and available soil moisture to determine whether groundwater wells can be pumped. Since 1991, the average annual pumping from Owens Valley wellfields has been less than 75,000 AF compared to 107,000 AF from 1974 to 1990.

Annual water deliveries from the LAA to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. At its peak in FYE 1984, the LAA delivered 531,729 AF to the City. Concerns over environmental impacts have required the City to reallocate approximately one-half of the LAA water supply to other uses within the Owens Valley and Mono Basin. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AF to supply water for a variety of environmental projects throughout the Eastern Sierra.

Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra include Mono Basin releases, Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. When considering water allocations for these projects, the expected annual long term LAA delivery over the next 25 years is approximately 192,000 AFY for average years. However, annual deliveries for a series of dry years, are expected to range from approximately 71,400 AF to 143,000 AF.

The sole reliance on LAA supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City's annual water demands; therefore, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to mitigate the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.

Local Groundwater Supplies

Local groundwater provided approximately 8 percent of Los Angeles' total water supply, from FYE 2017 to FYE 2021. This amount significantly differs from 50 years ago when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has a focus on sustainable management of its local groundwater basins. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels as well as advanced treatment systems to produce purified recycled water for groundwater replenishment.

Furthermore, LADWP has, and will continue to, conjunctively use this large groundwater basin within the City to store wet year LAA flows to supply water during dry periods.

The City's total adjudicated water rights are approximately 109,809 AFY, which are located within the San Fernando Basin (SFB), Sylmar Basin, Central Basin, and West Coast Basin. There are additional groundwater basins near and within the Los Angeles area, such as the unadjudicated Hollywood, Santa Monica, and northern Central Basins that may provide additional groundwater supplies for the City.

The SFB is the primary source of local groundwater for the City. It is located in the Upper Los Angeles River Area (ULARA) and spans 112,000 acres. The ULARA encompasses the San Fernando and Sylmar Basin. It is managed by a court-appointed Watermaster and administrative

committee that oversees the operation of GW system and report the groundwater elevations and water quality. The average SFB groundwater rights is approximately 87,000 AFY. LADWP is implementing its SFB Groundwater Remediation Program to help restore the capacity of SFB as a drinking water source and groundwater storage. LADWP is implementing the following groundwater remediation facilities:

1. North Hollywood West Response Action is expected to be operational in early 2023.
2. Tujunga Response Action is expected to be operational in mid-2023.
3. North Hollywood Central Response Action is expected to be operational in late 2023.

LADWP receives additional SFB water through the Los Angeles-Burbank Interim Interconnection Pipeline. In 2015, the City of Los Angeles and the City of Burbank entered into an agreement to construct and operate the Los Angeles-Burbank Interim Interconnection and began delivery of a minimum of 500 AF of blended water in August 2019. The blended water consists of SFB groundwater treated at the Burbank Operable Unit and Metropolitan Water District of Southern California imported water supply. This connection began service in August 2019 and will operate for five years.

The Central Basin is another source of groundwater supply for the City. The Central Basin Watermaster oversees this area that is located in the southeastern part of the Los Angeles Coastal Plan in Los Angeles County. The City has approximately 17,236 AFY of groundwater rights in this basin. With additional carryover and storage of unused water rights, the City has accrued a total of 22,943 AF of stored water as of FYE 2020. LADWP is implementing the following projects at Manhattan and the 99th Street Wellfields to address a few issues such as water quality matters, deteriorating groundwater pumps, and necessary upgrades:

1. Manhattan Wells Improvement Project is to be commissioned in early 2022.
2. 99th Street Filtration Plant Project includes a series of wellfield improvements to address the water quality issues, expected to be completed in 2025.

Besides the SFB and CB, the City holds water rights in the following local groundwater basins:

1. The Sylmar and Eagle Rock basins are adjudicated basins, managed by the ULARA, that provides 3,570 AF and 500 AF, respectively. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. The Mission Wellfield facility has been undergoing continued improvements since the early 2000's to replace the existing deteriorated facilities and restore Sylmar Basin groundwater production capacity. Although the City has the right to produce groundwater from Eagle Rock Basin, there are no current plans to establish groundwater production facilities here.

2. The West Coast Basin is managed by the West Coast Basin Watermaster and is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. LADWP has the right to pump 1,503 AF. In 2014, the West Coast Basin Judgment was amended to increase certain parties', like LADWP's, pumping capacity to 5,000 AFY of unused West Coast Basin rights out of the Central Basin. This basin has groundwater quality problems related to TDS, chloride, and hydrocarbon pollutants; therefore, LADWP has discontinued use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.

Groundwater produced by the City from the San Fernando, Sylmar, and Central Basins for the last available five years are shown in **Table 4.14.1-3**, *Historical Local Groundwater Basin Supply.*

TABLE 4.14.1-3
HISTORICAL LOCAL GROUNDWATER BASIN SUPPLY

Fiscal Year (July–June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2016–2017	55,116	0[a]	3,005
2017–2018	22,259	0[a]	1[a]
2018–2019	36,870	1[a]	5[a]
2019–2020	35,949	2[a]	10[a]
2020–2021	53,625	1,363	2,247

NOTES: AF = acre-feet.

[a] Small quantities pumped from Sylmar and Central Basin were for water quality testing purposes, not water supply.

SOURCE: LADWP, 2022.

LADWP also has groundwater rights outside the of City. There are 3,975 AF of groundwater rights in the Antelope Valley Groundwater Basin. This basin only allows the native water rights to be used locally; however, LADWP would have the ability to store water it imports into the basin for future export. LADWP would be able to recover imported and stored water for export to the City at times when it is necessary to manage seasonal peak demand or augment supplies during dry periods, emergencies, or natural disasters.

The Central and West Los Angeles areas of the City overlie the unadjudicated groundwater basins from Hollywood Basin, Santa Monica Basin, and the northerly area of Central Basin located outside of the adjudicated Central Basin boundary. LADWP is considering and exploring opportunities to develop groundwater resources in these manners that is locally sustainable and in cooperation with its regional partners to increase the City's use of local resources. Since the SGMA took effect on January 1, 2015, LADWP had been working with regional partners towards implementing a SGMA Groundwater Sustainability Plan (GSP) for the Santa Monica Basin. In September 2017, DWR approved the formation of the Santa Monica Basin Groundwater Sustainability Agency (SMGSA), which consisted of LADWP and four other local agencies. The SMGSA submitted the final GSP to DWR in January 2022. For additional information, refer to Chapter 5 "Local Groundwater" of LADWP's 2020 UWMP.

Water Conservation

Water conservation and water use efficiency have significant effects on the City's water use patterns and their benefit to reducing water demands and pressure on other water supplies have become a permanent part of LADWP's water management philosophy.

The City's water usage today is the same as over fifty years ago despite an increase in population of over one million people, reflecting the success and importance of the City's water conservation strategies. In the future, conservation will continue to be an important part of maintaining long term

supply reliability and is a key component of LADWP's goals to reduce potable water use per capita by 22.5 percent and 25 percent by 2025 and 2035, respectively. LADWP will also comply with the State's water use requirements of Assembly Bill 1668 (2018) and Senate Bill 606 (2018).

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes. Since inception of LADWP's conservation program, the estimated cumulative annual active savings is over 150,000 AFY. Additional savings are passive savings, achieved from codes, ordinances, and changes in customer behavior due to outreach and educational programs. Further, the State and local conservation ordinances and plumbing codes help LADWP to achieve water conservation throughout its service area and customer classes. Refer to the WSA-Los Angeles Parcel in Appendix O of this Draft EIR for additional information on the City's Water Conservation programs.

Stormwater Capture

Stormwater runoff from urban areas is an underutilized local water resource. Within the City, the majority of stormwater runoff is directed to storm drains and ultimately channeled into the ocean. This unused stormwater carries many pollutants that are harmful to marine life and public health. In addition, local groundwater aquifers that could be replenished by stormwater are receiving less recharge than in past historical times due to increased urbanization. Urbanization has increased the City's hardscape, which has resulted in less infiltration of stormwater and a decline in groundwater elevations. In response, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by on-site capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 AF. Through the implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, it will provide for increased groundwater recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035. This amount is between the conservative estimate of 132,000 AFY and aggressive scenario of up to 178,000 AFY by 2035. Refer to the WSA-Los Angeles Parcel in Appendix O of this Draft EIR for additional information on the City's stormwater capture programs.

Water Recycling

Today, LADWP serves approximately 179 sites in the City with recycled water for irrigation, industrial, and environmental beneficial uses. There are approximately 200 individual customer service accounts, with several projects containing multiple customer accounts at a single location. Recycled water produced for FYE 2020 was 36,392 AFY, inclusive of municipal and industrial, and environmental reuse.

LADWP is committed to maximizing use of recycled water in the City's water supply portfolio. Expansion of recycled water use to offset potable demands has been recognized as one method that will help LADWP achieve its goal of improving the local sustainability of its water supply. LADWP is working in conjunction with LASAN to develop non-potable reuse projects for

irrigation and industrial uses. In addition, the City is pursuing a groundwater replenishment project to replenish the San Fernando Groundwater Basin with highly treated recycled water. LADWP's recycled water use is projected to reach 50,900 AFY by FYE 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through FYE 2045. Environmental reuse is expected to remain relatively constant at approximately 26,600 AFY.

Metropolitan Water District of Southern California

As one of the 26 member agencies of MWD, the City through LADWP purchases water from MWD to supplement its water supplies from the LAA, local groundwater, and recycled water. Between FYE 2017 to FYE 2021, LADWP purchased an average of 201,211 AFY from MWD or approximately 40 percent of the City's total water supply.

As discussed above, MWD imports water from two principal sources: northern California via the California Aqueduct and the Colorado River via the Colorado River Aqueduct. MWD also manages and owns in-basin surface storage facilities, stores groundwater within the basin via contracts, engages in groundwater storage outside the basin, and conducts water transfers to provide additional supplies for its member agencies. All member agencies have preferential rights to purchase water from MWD, pursuant to Section 135 of MWD Act. As of FYE 2021, LADWP has a preferential right to purchase 17.93 percent of MWD's total water supply.

MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans. MWD's actions have been focused on the following: continuing water conservation, developing water supply management programs outside of the region, developing storage programs related to the SWP and the Colorado River, developing storage and groundwater management programs within the Southern California region, increasing water recycling, groundwater recovery, stormwater, and seawater desalination and pursuing long-term solutions for the ecosystem, regulatory and water supply issues in the California Bay-Delta.

4.14.1.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to water supply if it would:

- **WS-1:** Require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects.
- **WS-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Methodology

Water Infrastructure

The analysis of impacts to water infrastructure is based on the analysis in the Utility Report (included as Appendix P of this Draft EIR). The analysis: (1) identifies the domestic water mains that would serve the Project; (2) identifies the capacity and water pressures in these mains based

on flow; and (3) determines whether the subject water mains have the capacity to serve the Project based on the capacity in these mains allotted to the Project.

Culver City

GSWC performed a hydraulic analysis of their water system to determine if adequate fire flow could be supplied to the Project from the existing water infrastructure surrounding the Project Site. Based on the results of the Information of Fire Flow Availability Request (IFFAR), GSWC makes a determination whether it can supply the Project with sufficient water flow and pressure. See Exhibit 1 of the Utility Report (Appendix P of this Draft EIR) for the results of the IFFAR.

Los Angeles

LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model near the Project Site. Based on the results, LADWP determines whether they can meet the Project fire hydrant flow needs based on existing infrastructure. See Exhibit 12 of the Utility Report for the results of the IFFAR.

In addition, LADWP performed a flow test to determine if available water conveyance exists for future development. LADWP's approach consists of data ranging from available static pressure (meaning how much pressure is available at the source before applying the Project's demand), to the available pressure at the maximum demand needed for a project. Based on the results, LADWP determines whether they can meet a project's needs based on existing infrastructure. See Exhibit 2 of the Utility Report for the results of the Service Advisory Request (SAR) for Venice Boulevard.

Impacts regarding the adequacy of water infrastructure for fire-fighting purposes are addressed in Section 4.11.1, *Public Services – Fire Protection*, of this Draft EIR.

Water Supply

Per Section 10912 of the Water Code, a WSA is required for the Project. The Project's net increase in estimated office floor area would exceed 250,000 sf, and as such, the Project is subject to the requirements of SB 610, which requires a WSA. Both GSWC and LADWP have prepared separate WSAs that address the ability of both water providers to serve domestic water service to the Project pursuant to the legislative requirements. The WSAs' data and findings, included in Appendix O of this Draft EIR, are summarized within this EIR section.

The Project's demand for domestic water was assessed in relation to GSWC's and LADWP's ability to supply water pursuant to their 2020 UWMPs and the findings of each WSA, respectively. The water demand was calculated based on wastewater generation factors provided by the City of Los Angeles Bureau of Engineering for both the Culver City Parcel and Los Angeles Parcel. This method of calculating future water demand for new development is a common practice in the Los Angeles region and is based on sewage generation factors (SGF) used by the Los Angeles Bureau of Engineering for purposes of assessing sewer charges, and is consistent with the methodology used to assess the portion of the development that will be served by LADWP in its WSA.

City of Los Angeles Bureau of Engineering published a list of SGFs for approximately 175 different building use types, and updates factors to make necessary adjustments due to water conservation

efforts and increased efficiencies in new appliances and plumbing fixtures. Outdoor landscape water demand is estimated per California Code of Regulations Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. LADWP also encouraged the Project to implement additional water conservation measures above and beyond the current water conservation ordinance requirements in order to reduce the Project's total proposed water demand. These corresponding reductions are accounted for in LADWP's WSA for the Los Angeles Parcel (refer to Project Design Feature WATER-PDF-1). The WSA for the Culver City Parcel did not account for water conservation reductions included in Project Design Feature WATER-PDF-1 and, thus, provides a conservative analysis of the Project's water supply impacts.

Project Design Features

The following project design features are proposed to reduce the water impacts of the Project:

> **WATER-PDF-1 (Water Conservation):** The Project will implement water conservation measures that include, but are not limited to, the following:
>
> - Fixtures
>   - High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less
>   - Showerheads with a flow rate of 1.5 gallons per minute, or less
>   - All utility, service and mop sinks will have a maximum flow rate of 1.5 gallons per minute
>   - Condensate drain water capture and reuse for irrigation
>   - An air cooled / air source mechanical cooling system will be utilized in lieu of cooling towers.
> - Landscape and Irrigation
>   - California Friendly® plants or native plants
>   - Drip/ Subsurface Irrigation (Micro-Irrigation)
>   - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
>   - Weather Based Irrigation Controllers
> - Utilities
>   - Individual metering and billing for water use for every commercial unit

Analysis of Project Impacts

Threshold WS-1: Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects?

Impact Analysis

Construction

Water, such as soil watering for soil compacting and fugitive dust control, masonry, painting, clean-up, and other related activities, would be required during construction. Project construction would

be continuous and overlapping for the two proposed buildings. Building 1 construction is projected to begin in the first quarter of 2023 with completion by the fourth quarter of 2024 while the construction of Building 2 will begin the third quarter of 2023 with completion in the fourth quarter of 2025. Project operations are expected as early as 2026. Water for construction of buildings in both the Culver City Parcel and Los Angeles Parcel would be required for activities such as dust control, cleaning of equipment, excavation/export, removal and re-compaction. Non-potable water could be used for soil compacting and dust control purposes, if required, and would represent the majority of the water used during construction. Such practices are implemented by the contractor and use non-potable water trucked to a construction site. Project construction activities would create a demand for some potable water, such as drinking, cleaning of brushes and other items, and lavatories. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project.

The Project will also require construction of new, on-site water distribution lines to serve new buildings and facilities of the Project. The Project anticipates connections for fire and domestic water service along Venice Boulevard for the Los Angeles Parcel and connections along National Boulevard for the Culver City Parcel. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to existing water mains are anticipated at this time. A Construction Management Plan (refer to Project Design Feature TRAF-PDF-1) would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Prior to ground disturbance, Project contractors would coordinate with LADWP and GSWC to identify the locations and depth of all lines. Further, agencies would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and are typically responsible for the installation of new meters and main connections, as well as work on water mains within the public right-of-way (i.e., main extensions). Therefore, Project impacts on water associated with construction activities would be less than significant.

Operation

Water service to the Project Site would continue to be provided by GSWC and LADWP, as under existing conditions. When analyzing the Project for infrastructure capacity, although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity.

With regard to the Culver City Parcel (Building 1), based on correspondence from the Culver City Fire Department (CCFD), Building 1 on the Culver City Parcel has a minimum fire flow requirement of 2,250 gpm at 20 psi residual for a duration of 2 hours, in compliance with the CCMC

Section 9.02.[25] As discussed in the Utility Report, GSWC has performed an IFFAR for the Project to confirm adequate fire flow pressure for Building 1 on the Culver City Parcel from the existing infrastructure. Two fire hydrants located on National Boulevard were tested and the results, as provided in Appendix P of this Draft EIR, indicate that the fire hydrants can provide 6,828 gpm at 20 psi for a duration of 2 hours. Based on the results, GSWC determined that the Project fire hydrant flow needs can be supplied by existing infrastructure for the Culver City Parcel.

With regard to the Los Angeles Parcel (Building 2), based on fire flow standards set forth in Section 57.507.3 of the LAMC, and as determined by LAFD, Building 2 appears to fall within the "Industrial and Commercial" category, which has a required fire flow of 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously with a residual pressure of 20 psi. As discussed in the Utility Report, an IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The results indicate that the existing infrastructure can produce a combined flow rate of 3,600 gpm. The fire hydrants listed in the IFFAR from LADWP are not expected to be the only sources of fire flow to the Project Site. Fire hydrants located within Culver City limits operated by GSWC would be available for the fire suppression in the event of an emergency. The available flow from these can be combined with the total from the LADWP fire hydrants to provide the required fire flow demand of 6,000 to 9,000 gpm. As indicated above, the fire hydrants located within Culver City limits operated by GSWC can provide 6,828 gpm at 20 psi for a duration of 2 hours. When combined with the four fire hydrants within the City of Los Angeles, the total fire flow that can be supplied to the Project Site is 10,428 gpm, surpassing the required 6,000-9,000 gpm required by LAFD for the Los Angeles Parcel.

Furthermore, LAMC Section 57.513, Supplemental Fire Protection, states that:

> *Where the Chief determines that any or all of the supplemental fire protection equipment or systems described in this section may be substituted in lieu of the requirements of this chapter with respect to any facility, structure, group of structures or premises, the person owning or having control thereof shall either conform to the requirements of this chapter or shall install such supplemental equipment or systems. Where the Chief determines that any or all of such equipment or systems is necessary in addition to the requirements of this chapter as to any facility, structure, group of structures or premises, the owner thereof shall install such required equipment or systems.*

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. Based on LAMC Section 94.2020.0 that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, an SAR was submitted to LADWP to determine if the existing public water infrastructure could meet the domestic demands of the Project. Based upon the SAR results, the existing infrastructure is sufficient to meet the demands of the Project.

Based on the above, the existing GSWC and LADWP water infrastructure has adequate capacity and pressure to meet the Project's domestic and fire flow requirements. As such, Project operation

[25] CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022. Provided in Appendix L of this Draft EIR.

would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects. Project operational impacts related to water infrastructure would be less than significant.

Mitigation Measures

Impacts regarding the relocation or construction of new or expanded water facilities were determined to be less than significant; therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold WS-2: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Analysis

Construction

As stated under Threshold (a), water would be required for Project construction activities, such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Construction activities would be intermittent, with demand for water consumption variable but generally temporary in nature.

As stated above and in the Utility Report, based on a review of construction projects of similar size and duration, a conservative estimate of construction water demand would be approximately 1,000 to 2,000 gpd for the Project.[26] The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. Water use during construction would be temporary given that project construction activities would be temporary (about 3 years). It is, therefore, expected that Project construction activities would generate minimal potable water demand and would be met with existing water supplies provided by GSWC and LADWP.

As analyzed below under Operational impacts, sufficient water supplies exist to meet the Project's projected operational water demand, in addition to the existing and planned future demands for normal, single-dry, and multiple-dry years on GSWC and LADWP water supplies. As Project construction would require a nominal amount of water compared to Project operation, the Project's intermittent construction-related water demand would be met by LADWP's available water supplies. For these reasons, adequate water supplies would be available from existing entitlements and resources for Project construction activities.

[26] KPFF Consulting Engineers, Culver Crossings Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, p. 24. Provided in Appendix P of this Draft EIR.

Therefore, GSWC and LADWP would have sufficient water supplies to serve the Project during construction and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply during construction would be less than significant.

Operation

Project Water Demand

Estimated domestic water demand for the Project, as calculated in the WSA - Culver City Parcel and the WSA – Los Angeles Parcel, is shown in **Table 4.14.1-4**, *Project's Estimated Water Consumption,* shows the net increase in potable water that would be required for the Project. As shown in Table 4.14.1-4, the net water demand for the Culver City Parcel would be 24 AFY, while the Los Angeles Parcel would have a net water demand of 61 AFY. Together, the water demand for the Project would be 85 AFY.

TABLE 4.14.1-4
PROJECT'S ESTIMATED WATER CONSUMPTION

Building Use	Water Use Factor(GPD/Unit)	Quantity (SF)	Water Demand	
			gpd	AFY
Culver City Building 1: Estimated Proposed Water Demand				
Office Building	120 KGSF	167,000	20,040	22
Storage (Covered Parking) a	20 gallons/cleaning	166,240	107	0.12
Irrigation	--	--	795	0.89
Distribution System Losses	--	--	634	0.71
Existing Site Demand			-29	-0.033
Total Proposed Water Demand			**21,576**	**24**
Net Water Demand			**21,547**	**24**
Los Angeles Building 2: Estimated Proposed Water Demand				
Office Building	120/KGSF	336,924	40,431	45
Employee Cafeteria	30/seat	855	25,650	29
Landscaping (Base Demand)	--	38,293	3,270	4
Covered Parking	20/KGSF	370,525	244	0
Base Demand Adjustment for Commercial			1,003	1
Project Subtotal			*70,598*	*79*
Required Ordinances Water Savings (Commercial and Landscaping)			-12,520	-14
Less Additional Conservation (Commercial and Landscaping)			-476	-1
Less Existing to be Removed Total			*-2,795*	*-3.13*
Net Water Demand			**54,807**	**61**
Total Project Demand			**76,354**	**85**

NOTES: KGSF= 1,000 gross square feet; gpd = gallons per day; sf = square feet, AFY = acre-feet per year.

[a] Water use for the parking area is assumed to be limited to water used for cleaning purposes. It is assumed that cleaning will occur 12 times per year at a rate of 0.02 gallons / sf.

SOURCE: EKI Environment and Water, Inc., 2022; LADWP, 2022.

Golden State Water Company Southwest Water Demand and Reliability Assessment

As discussed in the WSA – Culver City Parcel report, water purchased from WBMWD constitutes the primary source of supply for the GSWC Culver City service area, and is expected to be the sole source of supply within the 2045 planning horizon. The total projected potable supplies for the GSWC Culver City service area for normal, single dry, and multiple dry years are presented in **Table 4.14.1-5**, *Projected Normal Year Water Supply and Demand for Culver City Service Area*, **Table 4.14.1-6**, *Single Dry Year Water Supply and Demand for Culver City Service Area*, and **Table 4.14.1-7**, *Five Consecutive Dry Years Water Supply and Demand through 2045 for Culver City Service Area*, respectively. As shown in the tables, GSWC has sufficient supplies to meet demand in normal, single dry, and multiple dry years without shortages.

The WBMWD 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry and multiple-dry years. Because of this, GSWC expects that under all hydrologic conditions purchased water supplies will fully meet future purchased water demands. Therefore, consistent with the Culver City service area 2020 UWMP, the available supplies to the GSWC Culver City service area are considered to be equal to demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a 5-year drought period).

Table 4.14.1-5, Table 4.14.1-6, and Table 4.14.1-7 show sufficient water supplies in all hydrologic years; however, in the event of a water supply shortage as described in the GSWC 2020 UWMP, GSWC can implement its Water Shortage Contingency Plan (WSCP).[27] The WSCP requires water response actions to six water shortage stages, which correspond to progressively severe water shortage conditions (up to 10 percent, 20 percent, 30 percent, 40 percent, 50 percent, and greater than 50 percent shortage) as compared to the normal reliability condition. The following six (6) Stages list the shortage response actions:

- Stage 1 (0 to 10% shortage) – Stage 1 is a "Water Alert" where voluntary conservation is encouraged
- Stage 2 (10% to 20% shortage) – Stage 2 is a "Moderate Shortage" and will be implemented if the Stage 1 restrictions are deemed insufficient to achieve necessary demand reductions due to water supply shortages.
- Stage 3 (20% to 30% shortage) – Stage 3 is a "Severe Shortage" that requires water allocations and mandatory conservation.
- Stage 4 (30% to 40% shortage) – Stage 4 is a "Critical Shortage" that includes all steps taken in prior stages regarding allocations and mandatory conservation.
- Stage 5 (40% to 50% shortage) – Stage 5 is a "Shortage Crisis" that includes all steps taken in prior stages regarding allotments and mandatory conservation. This stage will be implemented in the event that the source of supply is severely curtailed to the level that requires each customer to restrict their water use for only human health and safety purposes.
- Stage 6 (50% or greater shortage) – Stage 6 is an "Emergency Shortage" condition that includes all steps taken in prior stages regarding allotments and mandatory conservation.

[27] GSWC, Culver City Service Area 2020 Urban Water Management Plan, Chapter 6, June 15, 2021.

TABLE 4.14.1-5
PROJECTED NORMAL YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	2030	2035	2040	2045
Supply	5,002	5,086	5,175	5,269	5,370
Water Demand with Project	5,002	5,086	5,175	5,269	5,370
Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: GSWC, 2020.

TABLE 4.14.1-6
SINGLE DRY YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	2030	2035	2040	2045
Single Dry Year Supply	5,502	5,594	5,692	5,796	5,907
Water Demand with Project	5,502	5,594	5,692	5,796	5,907
Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: GSWC, 2020.

TABLE 4.14.1-7
FIVE CONSECUTIVE DRY YEARS WATER SUPPLY AND DEMAND THROUGH 2045 FOR CULVER CITY SERVICE AREA

Year		2025	2030	2035	2040	2045
1	Total Dry Year Supply	5,502	5,594	5,692	5,796	5,907
	Demand	5,502	5,594	5,692	5,796	5,907
	Difference	0	0	0	0	0
2	Supply	5,520	5,613	5,712	5,817	5,907
	Demand	5,520	5,613	5,712	5,817	5,907
	Difference	0	0	0	0	0
3	Supply	5,538	5,633	5,733	5,839	5,907
	Demand	5,538	5,633	5,733	5,839	5,907
	Difference	0	0	0	0	0
4	Supply	5,557	5,652	5,754	5,862	5,907
	Demand	5,557	5,652	5,754	5,862	5,907
	Difference	0	0	0	0	0
5	Supply	5,575	5,672	5,775	5,884	5,907
	Demand	5,575	5,672	5,775	5,884	5,907
	Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: GSWC, 2021.

LADWP Service Area Water Demand and Reliability Assessment

LADWP's 2020 UWMP provides water supply and demand projections in 5-year increments to 2045 for average year, single dry year, and multiple dry years; refer to **Table 4.14.1-8**, *LADWP Service Area Reliability Assessment for Average Weather Year*, **Table 4.14.1-9**, *LADWP Service Area Reliability Assessment for Single Dry Year*, and **Table 4.14.1-10**, *LADWP Service Area Reliability Assessment for Multiple Dry Years (Year 5 of 5).* The analysis in Table 4.14.1-10 regarding multiple years is based on historic conditions that occurred between 1988 to 1992, with Year 5 (1992) presenting the worse-case conditions when supplies would be at their lowest. These tables show that LADWP can provide reliable water supplies under all three hydrologic scenarios through the 25-year planning period.

In addition, **Table 4.14.1-11**, *Service Area Drought Reliability Assessment*, provides an assessment of near-term water supply from 2021 to 2025, which is based on historic 1988–1992 drought conditions. As shown therein, LADWP can provide near-term reliable water supplies through 2025 under drought conditions.

TABLE 4.14.1-8
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR AVERAGE WEATHER YEAR

Demand and Supply Projections (in acre-feet)	**Average Year – Fiscal Year Ending on June 30**				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**642,600**	**660,200**	**678,800**	**697,800**	**710,500**
Post-Conservation Demand	**509,500**	**526,700**	**536,100**	**554,500**	**565,800**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	133,100	133,500	142,700	143,300	144,700
Los Angeles Aqueduct[d]	190,400	188,900	187,300	185,800	184,200
Groundwater					
Entitlements[e]	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*461,200*	*480,000*	*495,100*	*493,700*	*493,700*
MWD Water Purchases (With Existing/Planned Supplies)	181,400	180,200	183,700	204,100	216,800
Total Supplies	**642,600**	**660,200**	**678,800**	**697,800**	**710,500**

NOTES:

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 AFY by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: LADWP, 2021.

TABLE 4.14.1-9
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR SINGLE DRY YEAR

Demand and Supply Projections (in acre-feet)	Average Year – Fiscal Year Ending on June 30				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**674,700**	**693,200**	**712,700**	**732,700**	**746,000**
Post-Conservation Demand	**509,500**	**536,700**	**536,100**	**554,500**	**565,800**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	165,200	165,500	176,600	178,200	180,200
Los Angeles Aqueduct[d]	70,800	70,200	69,600	69,000	68,500
Groundwater					
Entitlements[e]	121,300	121,300	121,300	120,700	120,700
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*385,600*	*406,200*	*423,200*	*423,700*	*425,400*
MWD Water Purchases (With Existing/Planned Supplies)	289,100	287,000	289,500	309,000	320,600
Total Supplies	**674,700**	**693,200**	**712,700**	**732,700**	**746,000**

NOTES:

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 AFY by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: LADWP, 2021.

TABLE 4.14.1-10
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR MULTIPLE DRY YEARS (YEAR 5 OF 5)

Demand and Supply Projections (in acre-feet)	Multiple Dry Year: Year 5 (1992) – Fiscal Year Ending on June 30				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**655,700**	**673,600**	**692,600**	**712,000**	**724,900**
Post-Conservation Demand	**507,600**	**536,600**	**536,100**	**554,400**	**565,700**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	148,100	147,000	156,500	157,600	159,200
Los Angeles Aqueduct[d]	141,900	140,700	139,500	138,400	137,300
Groundwater					
Entitlements[e]	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*427,700*	*445,300*	*461,100*	*460,600*	*461,300*
MWD Water Purchases (With Existing/Planned Supplies)	228,000	228,300	231,500	251,400	263,600
Total Supplies	**655,700**	**673,600**	**692,600**	**712,000**	**724,900**

NOTES:

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 AFY by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: LADWP, 2021.

TABLE 4.14.1-11
SERVICE AREA DROUGHT RELIABILITY ASSESSMENT

Demand and Supply Projections (in acre-feet)	Drought (1988–1992) – Fiscal Year Ending on June 30				
Forecast Year	**2021**	**2022**	**2023**	**2024**	**2025**
Total Water Demand[a]	**645,900**	**652,600**	**668,600**	**658,600**	**655,700**
Post-Conservation Demand	**494,200**	**497,100**	**500,500**	**504,700**	**507,600**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	151,700	155,500	168,000	153,900	148,100
Los Angeles Aqueduct[d]	134,600	120,100	71,000	119,900	141,900
Groundwater					
Entitlements[e]	100,500	104,800	119,300	107,400	109,400
Groundwater Replenishment	0	1,750	3,500	3,500	7,000
Stormwater Recharge (Increased Pumping)	2,000	2,000	2,000	2,000	4,000
Recycled Water – Irrigation and Industrial Use	11,400	12,500	14,300	15,400	17,300
Subtotal (Existing/Planned Supplies)	*400,200*	*396,700*	*378,100*	*402,100*	*427,700*
MWD Water Purchases (With Existing/Planned Supplies)	245,700	255,900	290,500	256,500	228,000
Total Supplies	**645,900**	**652,600**	**668,600**	**658,600**	**655,700**

NOTES:

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 AFY by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: LADWP, 2021.

Project Water Supply Availability

The water demand projections in GSWC's 2020 UWMP and LADWP's 2020 UWMP were developed based on SCAG's 2020–2045 RTP/SCS demographic projections. GSWC's 2020 UWMP and LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's and LADWP's water supply projections in their respective 2020 UWMPs are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020 RTP/SCS by SCAG.

The analysis included in this Draft EIR indicates that the Project would conform with the use and intensity of development permitted by both the City of Culver City and the City of Los Angeles General Plans. The Project is also consistent with the demographic projections in the 2020 RTP/SCS. Thus, the anticipated water demand for the Project would be within GSWC's and LADWP's 2020 UWMPs projected water supplies for normal, single-dry, and multiple-dry years through the year 2045 and is also within the GSWC and LADWP 2020 UWMP's 25-year water

demand growth projections. Table 4.14.1-4 to Table 4.14.1-11 show sufficient water supplies in all hydrologic years would be available by GSWC and LADWP, as applicable.

Therefore, given that (1) the 2020 GSWC and LADWP UWMPs projections are inclusive of the Project and do not identify supply shortfalls under any hydrologic conditions evaluated; (2) the GSWC and LADWP has the ability to implement a WSCP in the case of supply shortages, and demonstrated its effectiveness during the historic 2013–2017 drought; and (3) the increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available to GSWC and LADWP to meet all future demands within the Culver City and LADWP service area and those associated with the Project.

Based on the above and as concluded in both the WSA – Culver City Parcel and WSA – Los Angeles Parcel, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Water supply impacts would be less than significant.

Mitigation Measures

Impacts regarding water supply were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding water supply were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

The geographic context for the cumulative impact analyses on water infrastructure and water supply is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project and the GSWC and LADWP service areas). Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 52 related projects within the vicinity of the Project Site. Of the 52 related projects, 34 are located within the City of Culver City and the remaining 18 are located within the City of Los Angeles.

Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to the applicable city review, as applicable, to ensure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to perform a hydraulic analysis, based on flow testing of facilities, to verify that there is available service. Individual projects are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval. Furthermore, GSWC and LADWP, together with their respective City Department of Public Works, conduct ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements as needed. Based on these facts and the above analysis relating to the Project's construction and operational impacts on the water infrastructure system, the Project's

incremental effects on the water infrastructure system would not be cumulatively considerable. Cumulative impacts on water infrastructure would be less than significant.

Water Supply

As discussed above, GSWC and LADWP, as public water service providers, are required to prepare and periodically update their UWMPs to plan and provide for water supplies to serve existing and projected demands. GSWC and LADWP's 2020 UWMPs account for existing development within their respective service areas, as well as projected growth through the year 2045. Additionally, under the provisions of SB 610, GSWC and LADWP are required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within their respective service area that meets certain criteria. The WSAs for such projects, in conformance with the UWMP, would evaluate the reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis.

The related 52 projects would contribute, in conjunction with the Project, to overall water demand on GSWC and LADWP. As shown in **Table 4.14.1-12**, *Estimated Cumulative Water Generation*, the related projects are anticipated to generate a total water demand of 601 AFY in the GSWC Culver City service area and 679 AFY in the LADWP service area. With the Project, the cumulative demand would be 625 AFY in the GSWC Culver City service area and 740 AFY in the LADWP service area. For purposes of this analysis and to provide a conservative estimate of the related projects' water demand, the related projects' wastewater generation is assumed for the related projects water demand. This estimate is conservative (i.e., high) since the wastewater generation rates do not quantify code-required conservation or applicant conservation commitments that would reduce water demand by the related projects or deduct for existing uses and assumes all the related projects would be fully built out.

The 625 AF water demand of the Project and related projects would represent approximately 13.2 percent of GSWC's 2021 Culver City service area water supply of 4,726 AF, with the Project's share of 24 AF representing approximately 5.1 percent of GSWC's 2021 Culver City service area water supply.

The 679 AF water demand of the Project and related projects would represent approximately 0.13 percent of LADWP's 2021 water supply of 508,359 AF, with the Project's share of 61 AF representing approximately 0.01 percent of LADWP's 2021 water supply.

TABLE 4.14.1-12
ESTIMATED CUMULATIVE WATER GENERATION

Land Uses	Quantity	Generation Factor[a]	Water Demand (gpd)
GSWC – Culver City Service Area			
Apartment[b]	578 du	150/du	86,700
Condominiums	36 du	150/du	5,400
Single Family Residential	8 du	185/du	1,480
Assisted Living	110 beds	70/bed	7,700
Office	800,828 sf	120/ksf	96,099
Retail	41,221 sf	25/ksf	1,031
Restaurant	94,659 sf	300/ksf	28,398
School	150 students	11/student	1,650
Theater	200 seats	3/seat	600
College	18,904 students	16/student	302,464
Media Studio	84,475 sf	50/ksf	4,224
Subtotal Related Projects			535,745 (601 AFY)
Project Net (Building 1)			21,547 (24 AFY)
Total			557,292 gpd (625 AFY)
LADWP Service Area			
Apartment	2,784 du	150/du	417,600
Condominium	139 du	150/du	20,850
Office	1,305,411 sf	120/ksf	156,649
Retail	117,456 sf	25/ksf	2,936
Restaurant	11,800 sf	300/ksf	3,540
Warehouse	50,775 sf	30/ksf	1,523
Manufacturing	53,762 sf		2,688
Subtotal Related Projects			605,787 (679 AFY)
Project Net (Building 2)			54,807 (61 AFY)
Total			660,594 gpd (740 (AFY)

NOTES: du = dwelling unit; sf = square feet; gpd = gallons per day; rm= room; stu = student; ksf = 1,000 sf; AFY – acre-feet per year.

[a] Water demand is based on the wastewater generation factors are from LASAN as provided in Exhibit 9 of the Utility Report, which in turn is included as Appendix P of this Draft EIR.

[b] Assumes all two-bedroom units.

SOURCE: KPFF Consulting Engineers, 2022; ESA, 2022.

As previously stated, the WSAs prepared for the Project and included as Appendix O of this Draft EIR concludes that GSWC and LADWP both would be able to meet the water demand of the Project together with the existing and forecasted growth in their respective service areas through 2045. Additionally, based on water demand projections through 2045 in their respective 2020 UWMPs, GSWC and LADWP have determined that they would be able to reliably provide water

to its customers through the year 2045, based on demographic growth projections in SCAG's 2020–2045 RTP/SCS which includes the Project and likely the related projects. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City of Los Angeles' Green Building Code requirements to reduce indoor water use by at least 20 percent and all projects would be required to use fixtures that conserve water in accordance with the California Building Code and the Los Angeles Green Building Code. In addition, like the Project, any related projects meeting the size criteria under SB 610 would be required to prepare and obtain GSWC and/or LADWP approval of a WSA, as applicable, that demonstrates how the water demand associated with these projects would be met.

Overall, as discussed above, the 2020 GSWC and LADWP UWMPs demonstrate that the City of Culver City and the City of Los Angeles will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. The 2020 UWMPs outline sources of water and measures to ensure adequate supplies of water are available to meet the needs of their respective service areas. Furthermore, GSWC and LADWP will continue to update their UWMPs every five years to ensure that sufficient water supply continues to be available.

Based on the above, it is anticipated that GSWC and LADWP would be able to meet the water demands of the Project and future growth within its service area through at least 2045. Therefore, the Project together with the related projects would not result in significant cumulative impacts related to water supply, nor would the Project contribute considerably to significant cumulative water demand impacts. As such, cumulative water supply impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding water infrastructure and water supply were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts regarding water infrastructure and water supply were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.14.2 Wastewater

4.14.2.1 Introduction

This section analyzes potential Project impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes the *Utility Infrastructure Technical Report: Water, Wastewater, and Energy Report* (Utility Report) prepared for the Project by KPFF Consulting Engineers, dated April 2022, and included as Appendix P of this Draft EIR. The Utility Report includes the result of a sewer area study prepared by KPFF Consulting Engineers, dated April 6, 2022 (refer to Exhibit 7 of the Utility Report), which includes an analysis of additional demand added on each segment of the sewer line, and a Sewer Capacity Availability Report (SCAR) prepared by the City of Los Angeles Bureau of Sanitation (LASAN) (refer to Exhibit 3 of the Utility Report).

4.14.2.2 Environmental Setting

Regulatory Framework

There are several plans, policies, and programs regarding Wastewater at the state and local levels. Described below, these include.

- California Green Building Standards Code
- Culver City General Plan
- Culver City Municipal Code
- Los Angeles General Plan Framework
- Los Angeles Green Building Code
- Los Angeles Integrated Resources Plan
- Los Angeles One Water LA 2040 Plan
- Los Angeles Water Efficiency Requirements Ordinance
- Los Angeles Sewer Capacity Availability Review
- Los Angeles Sewerage Facilities Charge
- Los Angeles Bureau of Engineering Special Order No. SO 06-0691

State

California Green Building Standards Code

The California Green Building Standards Code (CALGreen Building Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Building Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

Local

City of Culver City

Culver City General Plan

There are no wastewater collection and treatment Plan goals, policies, objectives or programs in the Culver City General Plan applicable to the Project.

Culver City Municipal Code

The Culver City Municipal Code (CCMC) sets specific wastewater collection and treatment facilities requirements. CCMC Section 5.02.005 requires a City-issued connection permit to connect to the City's wastewater collection system. CCMC Section 5.02.220 establishes a Sewerage Facilities Charge for new connections to the Culver City wastewater collection system which represents the proportionate cost of providing service to the new development. The City Engineer may require a project applicant to submit plans and other information necessary to determine the applicable sewage facilities fees during plan check review, with the fees based on a standard formula that includes the proposed square footage and types of land uses. CCMC Section 5.02.035 establishes a Sewer User Fee, which is collected annually from Culver City property owners, for the cost, maintenance, repair and improvement of that portion of the City of Los Angeles sewerage system (i.e., wastewater conveyance systems) used jointly by Culver City and the City of Los Angeles under the Amalgamated Agreement.

City of Los Angeles

Los Angeles General Plan Framework Element

The Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[1] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[2]

Los Angeles Green Building Code

The City of Los Angeles has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Examples of such water conservation features include, but are not limited to, low water shower heads, toilets, clothes washers and dishwashers. Because the flow through these fixtures is reduced, residual wastewater passing through is reduced, in turn reducing the demand for sewage conveyance and treatment.

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1 City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

2 City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater, originally adopted by City Council on December 11, 1996, and re-adopted on August 8, 2001.

Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles Green Building Code (Los Angeles Green Building Code, Ordinance No. 181,480),[3] was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The Los Angeles Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Building Code. The Los Angeles Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

Los Angeles Integrated Resources Plan

The City of Los Angeles Integrated Resources Plan (IRP) was developed by multiple departments in order to address the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[4] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered category (Go Project 2 and Go Project 3) and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5). Construction of wastewater storage facilities at the Donald C. Tillman Water Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.[5]

Los Angeles One Water LA 2040 Plan

In April 2018, the City of Los Angeles prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[6] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future

3 City of Los Angeles, Ordinance No. 181,480.

4 City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012.

5 City of Los Angeles Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

6 City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[7] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

Los Angeles Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[8] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

Los Angeles Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review when a project applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A Sewer Capacity Availability Review provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

Los Angeles Sewer Facilities Charge

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

Los Angeles Bureau of Engineering Special Order No. SO 06-0691

The City of Los Angeles establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during

7 City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

8 City of Los Angeles, Ordinance No. 180,822.

their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).[9]

Existing Conditions

Wastewater Collection

Wastewater collection within the City of Culver City is provided by the Culver City Public Works Department, which maintains the Culver City wastewater collection system. Wastewater in the City of Los Angeles is collected and conveyed by four separate sanitary sewer systems owned and operated by LASAN. LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area. The larger of these, the Hyperion Service Area, encompasses the majority of the City of Los Angeles (including the Project Site) and also accepts sewage from 29 other jurisdictions, including the City of Culver City. Specifically, the conveyance of wastewater from Culver City's wastewater collection system to the Hyperion Service Area for treatment and disposal is provided under an Amalgamated Agreement between the Cities of Culver City and Los Angeles.[10] Under this agreement, the City of Culver City pays the City of Los Angeles a proportionate share of the costs for conveyance, operation, maintenance, repair and capital improvements to upgrade and improve the conveyance facilities jointly used by the two cities. This charge is collected annually from property owners in the City of Culver City through an annual Sewer User Fee, and through payment of a one-time Sewer Facility Charge required for new development projects. The agreement does not place a cap on the amount of sewage the City of Los Angeles will accept from the City of Culver City.

City of Culver City

Culver City operates and maintains 85 miles of gravity and force main sewers and seven pump stations within the City of Culver City. As discussed in the Utility Report, based on as-built drawings provided by the City of Culver City Public Works, there is an 8-inch sewer main on National Boulevard approximately 28 feet west of the Project Site and a 10-inch sewer main on Washington Boulevard. The Culver City Parcel is expected to be served by the 8-inch sewer main within National Boulevard.

City of Los Angeles

The City of Los Angeles has one of the largest sewer systems in the world including approximately 6,117 miles of gravity-fed sewer laterals and mains, pressurized mains, pump stations, treatment plants, and outfalls in the Pacific Ocean. As discussed in the Utility Report, based on City of Los Angeles Bureau of Engineering's (BOE's) online Navigate LA database, there is an 8-inch verified clay pipe (VCP) sewer main within Venice Boulevard, approximately 52 feet north of the centerline of Venice Boulevard. The Project would connect to this sewer main via the construction of new sewer laterals and the reconnection of an existing sewer lateral.

9 City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

10 Culver City, Amalgamated Agreement Between the City of Los and the City of Culver City for the Conveyance, Treatment and Disposal of Wastewater, April 1999.

Treatment Capacity

All wastewater generated within the Hyperion Service Area (including the City of Culver City) is transported through the Hyperion Service Area to one of three wastewater treatment plants owned and operated by LADPW: the Hyperion Water Reclamation Plant (HWRP) in Playa del Rey, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in the City of Los Angeles. The current treatment capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) which consists of 450 mgd at HWRP, 80 mgd at Donald C. Tillman Water Reclamation Plant, and 20 mgd at LAGWRP. The Project Site is located within the Hyperion Service Area, and its wastewater would be conveyed to and treated at the HWRP.[11,12,13]

The HWRP is the City's primary water reclamation plant and one of the oldest and largest wastewater treatment facilities in the world. The HWRP provides preliminary, primary, and secondary treatment processes, and also treats wastewater flows bypassed from the Terminal Island Water Reclamation Plant and LAGWRP. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily dry weather flow of 450 mgd and peak wet weather flow of 800 mgd.[14] The existing average daily flow for HWRP is approximately 260 mgd.[15] As such, the HWRP's current remaining treatment capacity for dry weather flows is approximately 190 mgd on an average day.

Following the secondary treatment of wastewater, the majority of effluent from HWRP is discharged into Santa Monica Bay, while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. The HWRP has two outfalls that presently discharge into the Santa Monica Bay, a one-mile outfall pipeline and five-mile outfall pipeline. Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis.

HWRP effluent is required to meet the Los Angeles Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are equal to or more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HWRP effluent to Santa Monica Bay is continually monitored by the City of Los Angeles Environmental Monitoring Division (EMD) to ensure that it meets or

11 City of Los Angeles Bureau of Sanitation (LASAN), Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=yb7ued7kk_514&_afrLoop=1716841967525366#!. Accessed April 2022.

12 LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717100937245723#!. Accessed April 2022.

13 LASAN, Los Angeles-Glendale Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717251119351961#!. Accessed April 2022.

14 LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=yb7ued7kk_514&_afrLoop=1716841967525366#!. Accessed April 2022.

15 LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

Wastewater Generation

As described in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is comprised of two properties, referred to herein as the Culver City Parcel and Los Angeles Parcel. The Project Site is currently improved with single-story warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. Based on the water demand provided in the Water Supply Assessment (WSA) from the Golden State Water Company (GSWC), the Culver City Parcel generates approximately 29 gpd of wastewater. Similarly, based on the WSA from the Los Angeles Department of Water and Power (LADWP), the Los Angeles Parcel generates 2,795 gpd.[16] As such, the Project Site generates a total of 2,824 gpd of wastewater.

4.14.2.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to wastewater if it would:

- **WW-1:** Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.
- **WW-2:** 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.

Methodology

The analysis of wastewater collection capacity in this section is based on the analysis in the Utility Report prepared for the Project. A sewer area study was prepared for the Culver City Parcel by KPFF Consulting Engineers and a SCAR was prepared for the Los Angeles Parcel by LASAN. The results of both are provided in attachments to the Utility Report and discussed further below.

Potential impacts of the Project on the existing public sewer infrastructure was analyzed by comparing the estimated Project wastewater generation with the calculated available capacity of the existing facilities. Considerations for determination include the location of the Project and appropriate points of connection to the wastewater collection system; description of the existing wastewater systems, including capacity and current flows; summary of adopted wastewater-related plans; and evaluation of Project wastewater needs.

In order to evaluate treatment capacity, the Project's estimated wastewater generation and projected peak flows were compared with the available capacity of the local sewer conveyance infrastructure and the treatment capacity within the HWRP. Cumulative wastewater generation was compared with the available capacity of the local sewer conveyance infrastructure and the capacity of the

[16] KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, pp. 15 and 16. Provided in Appendix P of this Draft EIR.

HWRP. While it is anticipated that future iterations of the IRP would provide for improvements to serve future population needs, it was conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to the Project's occupancy year of 2026. Based on this conservative assumption, wastewater generation would be compared with the projected available treatment capacity of the HWRP of 450 mgd for 2026, the Project's buildout year.

Project Design Features

No specific project design features are proposed with regard to wastewater. The Project would include water conservation features, which would also result in a reduction in wastewater. Such conservation features include those required by existing regulations as well as additional conservation measures included in Project Design Feature WATER-PDF-1 in Section 4.14.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR.

Analysis of Project Impacts

Threshold WW-1: Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Impact Analysis

Construction

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting through the completion of construction. No permanent service connections would be established during Project construction to handle wastewater generated by construction workers. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the existing sewer system, as appropriate. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity. Such activities would be confined to trenching to place the connections below the ground's surface and would be temporary in nature. The design of these connections would be developed by a registered engineer and approved by the City of Culver City Public Works or City of Los Angeles BOE, as applicable. If, during construction, existing sewer lines are found to be substandard or in deteriorated condition, the Project would be required to make necessary improvements to achieve adequate service in accordance with CCMC and LAMC requirements. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the appropriate jurisdiction. Further, all construction activities would happen in coordination with the appropriate agencies, including the City of Culver City Public Works, BOE, and LASAN. These

agencies would provide input on the Project and would coordinate with the Applicant before, during, and after construction activities. Finally, as discussed in Section 4.12, *Transportation*, of this Draft EIR, in accordance with Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. Therefore, based on these factors, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.

Operation

The wastewater generation estimates provided in the Utility Report are based on the City of Los Angeles sewerage generation factors for commercial categories while taking into account GSWC distribution system losses and base demand adjustments as well as LADWP ordinance savings, additional required conservation, and existing wastewater generation. **Table 4.14.2-1**, *Project Wastewater Generation During Operation*, provides the estimated wastewater generation for the Project. As shown therein, the Project would generate approximately 72,289 gallons per day (gpd) or 0.072 mgd of wastewater.

TABLE 4.14.2-1
PROJECT WASTEWATER GENERATION DURING OPERATION

Land Use	Quantity (unit)	Wastewater Generation Factor (gpd/unit)[a]	Total Wastewater Generation (gpd)
Culver City Parcel			
Office Building	167,000 sf	120 gpd/1,000 sf	20,040 gpd
Parking Structure	166,240 sf	20 gpd/1,000 sf	107 gpd[b]
Distribution System Losses			634 gpd
Less Existing to be Removed			(29 gpd)
Subtotal Culver City Parcel			20,752 gpd
Los Angeles Parcel			
Office Building	336,924 sf	120 gpd/1,000 sf	40,431 gpd
Employee Cafeteria	855 seats	30 gpd/seat	25,560 gpd
Parking Structure	370,525 sf	20 gpd/1,000 sf	244 gpd[b]
Base Demand Adjustment			1,003 gpd
Less Required Ordinance Water Savings			(12,520 gpd)
Less Additional Conservation			(476 gpd)
Less Existing to be Removed			(2,795 gpd)
Subtotal Los Angeles Parcel			51,537 gpd
		Project Total	**72,289 gpd**

NOTES: sf = square feet; gpd = gallons per day.

[a] The wastewater generation factors are based on the City of Los Angeles sewerage generation factors for commercial categories.

[b] As assumed in the Water Supply Assessments (WSAs) prepared for the Project, it is assumed that the parking areas would be watered 12 times a year for cleaning purposes. This is reflected in the calculations herein.

SOURCE: KPFF Consulting Engineers, 2022.

Sanitary sewer service to the Project Site from the surrounding streets is provided by the Culver City Public Works Department for the Culver City Parcel and LASAN for the Los Angeles Parcel. Sewer services for the Project would be provided using new and existing on-site sewer connections to the existing sewer mains within and adjacent to the Project Site. A sewer area study was prepared for the Culver City Parcel and a SCAR was prepared for the Los Angeles Parcel. The results of both are provided in attachments to the Utility Report. As determined in the sewer area study, which is provided in Exhibit 7 of the Utility Report, the existing infrastructure is adequately sized to accept flow from the Culver City Parcel. With regard to the Los Angeles Parcel, the SCAR also determined that there is adequate capacity within the existing infrastructure to accommodate the increased flow generated on the Los Angeles Parcel.

Detailed assessment and evaluation will be needed as part of the standard permitting process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. A final approval of the sewer capacity and connection permit would be made at the time of permitting. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable Culver City, LASAN and California Plumbing Code standards. Furthermore, in accordance with CCMS Sections 5.02.220 and 5.02.035, as well as LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection and user fees, as applicable, to help offset the Project's contribution to the City's wastewater collection infrastructure needs.

Construction of any on- or off-site wastewater infrastructure connections or upgrades would occur as discussed under the Construction impact analysis, above.

Additionally, as detailed below under Threshold WW-2, ample future capacity also exists at the HWRP, which would treat wastewater discharged from the Project Site, to handle Project wastewater flows.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities associated with the HWRP. In addition, the local sewer system would to be able to serve the Project's projected wastewater demand in addition to existing commitments. Therefore, impacts regarding wastewater infrastructure would be less than significant.

Mitigation Measures

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold WW-2: Would the Project 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?

Impact Analysis

Construction

As previously discussed under Threshold WW-1, construction of the Project would generate a negligible amount of wastewater by construction workers. Any such wastewater generated would be temporary only lasting as long as Project construction activities occur. Any wastewater generation from Project construction activities would also not cause a measurable increase in wastewater flows requiring treatment at the HWRP. Lastly, construction workers typically utilize portable restrooms, which would be serviced by a licensed contractor who would dispose of wastewater off-site and would not contribute to wastewater flows to the local wastewater collection system. Accordingly, Project construction would result in a determination by HWRP, the wastewater treatment provider that would serve the Project, that it has adequate capacity to serve the Project's construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area). Therefore, impacts resulting from Project construction would be less than significant.

Operation

As discussed under Threshold WW-1, sanitary sewer service to the Project Site from the surrounding streets is provided by the Culver City Public Works Department for the Culver City Parcel and LASAN for the Los Angeles Parcel. Sewer services for the Project would be provided using new and existing on-site sewer connections to the existing sewer mains within and adjacent to the Project Site. As concluded under Threshold WW-1, above, the local sewer system would to be able to serve the Project's projected wastewater demand in addition to existing commitments.

The Project's increase in wastewater generation of 0.072 mgd would represent approximately 0.02 percent of the HWRP's current design capacity of 450 mgd and approximately 0.01 percent of the Hyperion Service Area's estimated capacity of 550 mgd. As previously stated, the HWRP currently receives flows of approximately 260 mgd, which represents approximately 58 percent of its capacity and leaves approximately 190 mgd of remaining daily capacity. The Project's contribution of approximately 0.072 mgd of wastewater represents 0.04 percent of HWRP's remaining daily capacity of 190 mgd, which is a negligible increase in the wastewater volumes treated at the HWRP. Therefore, the wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2026, the year by which full buildout of the Project is expected to be completed. Future updates to the One Water LA 2040 Plan discussed above would provide for improvements beyond 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2026. Thus, based on this conservative assumption, the 2026 effective capacity of the

Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2026 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2026, the Project build-out year, would be approximately 267 mgd.[17] Accordingly, the future remaining available capacity in 2026 would be approximately 183 mgd. The Project's increase in average daily wastewater flow of 0.072 mgd would represent 0.04 percent of the estimated future 2026 remaining available capacity of 183 mgd at the HWRP. With regard to future flows, the Project's net increase of 0.072 mgd plus the projected 2026 flows of approximately 267 mgd to the HWRP would also represent 41 percent of the HWRP's assumed future capacity of 450 mgd. Therefore, wastewater generated by the Project, during operation, would be accommodated by the future 2026 capacity of the HWRP. Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project operation would result in a determination by HWRP, the wastewater treatment provider that would serve the Project Site, that it has adequate capacity to serve the Project's operational wastewater treatment demand, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant.

Mitigation Measures

Impacts regarding capacity for wastewater treatment were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding capacity for wastewater treatment were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Chapter 3, *Environmental Setting*, of this Draft EIR identified 52 related projects within the City of Culver City (34) and City of Los Angeles (18), all of which would generate wastewater that would be conveyed to the HWRP. During construction, wastewater generated by construction workers would be temporary and would last through completion of the related projects. Portable toilets would be provided and any generated wastewater would be disposed of off-site, and therefore, would be anticipated to result in negligible or no discharges to the respective wastewater treatment conveyance systems or treatment facilities.

Operation of these 52 related projects would cumulatively contribute, in conjunction with the Project, to wastewater generation in the Hyperion Service Area. For purposes of this analysis, wastewater generated by the related projects is assumed to be treated at the HWRP. As shown in **Table 4.14.2-2**, *Estimated Cumulative Wastewater Generation*, the estimated cumulative wastewater generation for

[17] Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2026 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd)/10) * 6] + 256 = 267 mgd.

the Project plus the related projects is approximately 1,213,821 gpd (1.2 mgd). This is conservative, as the related projects' wastewater estimates represents gross generation, rather than net generation after removal of any existing uses. This estimate also does not account for water conservation measures associated with each related project, and therefore likely overstates wastewater generation.

TABLE 4.14.2-2
ESTIMATED CUMULATIVE WASTEWATER GENERATION

Land Uses	Quantity	Generation Factor[a]	Total Sewer Generation (gpd)
Apartment[b]	3,362 du	150 gpd/du	504,300
Condominiums	175 du	150 gpd/du	26,250
Single Family Residential	8 du	185 gpd/du	1,480
Assisted Living Facility	110 beds	70 gpd/bed	7,700
Office	2,106,239 sf	120 gpd/1,000 sf	252,749
Retail	158,677 sf	25 gpd/1,000 sf	3,967
Restaurant	106,459 sf	300 gpd/1,000 sf	31,938
Warehouse	50,775 sf	30 gpd/1,000 sf	1,523
Manufacturing	53,762 sf	50 gpd/1,000 sf	2,688
School	150 stu	11 gpd/stu	1,650
College	18,904 stu	16 gpd/stu	302,464
Theater	200 seats	3 gpd/seat	600
Media Studio	84,475 sf	50 gpd/1,000 sf	4,224
Subtotal	—	—	1,141,532
Project (net increase)	—	—	72,289
Total	**—**	**—**	**1,213,821**

NOTES: du = dwelling unit; sf = square feet; gpd = gallons per day; rm= room; stu = student.

[a] Wastewater generation factors are from LASAN as provided in Exhibit 9 of the Utility Report, which in turn is included as Appendix P of this Draft EIR.

[b] Assumes all two-bedroom units.

SOURCE: KPFF Consulting Engineers, 2022; ESA, 2022.

The increase in wastewater generation from operation of the Project plus the related projects, totaling approximately 1.2 mgd, represents approximately 0.27 percent of the HWRP's current design capacity of 450 mgd and approximately 0.22 percent of the Hyperion Service Area's estimated capacity of 550 mgd. This increase represents approximately 0.64 percent of the remaining capacity of 190 mgd; when added to existing commitments, approximately 58 percent of the total capacity of the HWRP would be utilized.[18] Therefore, cumulative impacts regarding wastewater treatment capacity would be less than significant.

[18] (260 mgd + 1.2 mgd) / 450 mgd = 58 percent of the Hyperion Water Reclamation Plant's current design capacity of 450 mgd.

The HWRP currently meets applicable water quality standards as set forth by its NPDES Permit.[19] Implementation of the Sewer System Management Plans, upgrades in the advanced treatment processes at the treatment plants, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay by the Project and related projects are within applicable limits. Accordingly, the Project's incremental impacts, when considered together with the impacts of the related projects, would not result in a cumulatively considerable contribution to a significant cumulative impact related to wastewater treatment requirements. Therefore, cumulative impacts on wastewater treatment requirements would be less than significant.

All related projects would be subject to the provisions of the CCMC or LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. The applicable jurisdictions (City of Culver City or City of Los Angeles) would continue to review new development projects to ensure that local sewer capacity is available prior to the on-set of construction, and fees and mitigation including requirements to improve infrastructure if necessary to account for the project would be required. The preparation of a sewer area study or SCAR takes into account other recently approved sewer analyses to evaluate the cumulative impact of all known sewer studies on the sewer system. Therefore, with the provision of the sewer study areas or SCAR and any necessary local improvements on sewer capacity, cumulative impacts regarding the construction or relocation of new or expanded wastewater treatment facilities would be less than significant.

Based on the above, cumulative impacts on wastewater would be less than significant.

Mitigation Measures

Cumulative impacts regarding wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts regarding wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

[19] California Regional Water Quality Control Board Los Angeles Region, U.S. Environmental Protection Agency Region IX, Order R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

4.14.3 Solid Waste

4.14.3.1 Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on solid waste facilities. The analysis describes existing solid waste facilities and their associated capacities, estimates the amount of solid waste that would be generated during construction and operation of the Project, and evaluates whether existing and planned solid waste facilities could accommodate the estimated solid waste generated by the Project. This analysis is based in part on the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report prepared by the County of Los Angeles Department of Public Works in October 2021.

4.14.3.2 Environmental Setting

Regulatory Framework

The following describes the primary regulatory requirements regarding solid waste disposal. These plans, guidelines, and laws include:

- Assembly Bill 939 – California Integrated Waste Management Act of 1989
- Assembly Bill 1327 – California Solid Waste Reuse and the Recycling Access Act of 1991
- Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements
- Assembly Bill 1826 – Solid Waste: Organic Waste
- Zero Waste California
- California Green Building Standards
- Assembly Bill 341 – California's 75-Percent "Recycling" Goal
- County of Los Angeles Countywide Integrated Waste Management Plan
- Culver City Municipal Code
- Los Angeles General Plan Framework Element
- Los Angeles Green Building Ordinance
- Los Angeles Space Allocation Ordinance
- Los Angeles Citywide Construction and Demolition Debris Recycling Ordinance
- Los Angeles Solid Waste Integrated Resources Plan
- Los Angeles RENEW LA Plan
- Los Angeles Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System

State

Assembly Bill 939 – California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), as amended, was enacted to reduce, recycle, and reuse solid waste generated in the State. AB 939 requires city and county jurisdictions to divert 50 percent of the total waste stream from landfill disposal. AB

939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element to describe how it would reach these goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of AB 939, including the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the California Department of Resources Recycling and Recovery (CalRecycle) to update their progress toward the AB 939 goals.[1] CalRecycle is a department within the California Environmental Protection Agency (CalEPA) that administers and provides oversight for all of California's State-managed non-hazardous waste handling and recycling programs.

Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in Public Resources Code (PRC) Sections 42900–42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of the required storage areas is to be determined by the appropriate jurisdiction's ordinance.

Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (Senate Bill [SB] 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004.[2]

Assembly Bill 1826 – Organic Recycling

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a "business" as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate four cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that

[1] California Public Resources Code Section 41821.

[2] CalRecycle, Senate Bill 1374 (2002), August 24, 2018, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374. Accessed February 24, 2022.

generate four cubic yards or more of commercial solid waste per week also were required to arrange for organic waste recycling services. In October 2021, CalRecycle reduced this threshold to two cubic yards of solid waste (i.e., total of trash, recycling, and organics) per week generated by covered businesses.[3]

Zero Waste California

Zero Waste California is a State program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

California Green Building Standards

The 2019 California Green Building Standards Code, referred to as the CALGreen Building Code, sets standards for new structures to minimize the State's carbon output.[4] California requires that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Each local jurisdiction retains the administrative authority to exceed the new CALGreen Building Code. The 2019 CALGreen Building Code went into effect January 1, 2020.

Assembly Bill 341 – California's 75-Percent "Recycling" Goal

AB 341, signed on February 10, 2011, directed that no less than 75 percent of solid waste generated in California be source reduced,[5] recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 also mandated local jurisdictions to implement commercial recycling by July 1, 2012.

Regional

County of Los Angeles Countywide Integrated Waste Management Plan

Pursuant to AB 939, each County is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element. The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated State diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the Countywide Siting Element.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.

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3 CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed February 24, 2022.

4 Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes. Accessed February 24, 2022.

5 Source reduction refers to activities designed to reduce the volume, mass, or toxicity of products throughout their life cycle. It includes the design and manufacture, use, and disposal of products with minimum toxic content, minimum volume of material, and/or a longer useful life.

The most recent annual report, the CoIWMP 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the CoIWMP's horizon year of 2035.[6] As stated within the CoIWMP 2020 Annual Report, the County is anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[7] However, under other scenarios, including meeting CalRecycle's statewide disposal target, meeting Senate Bill 1383 organic waste disposal reduction targets, and all solid waste management options considered become available, a shortfall in disposal capacity is not expected to occur during this scenario during the 15-year planning period.[8]

Local

City of Culver City

Culver City Municipal Code

The Culver City Municipal Code (CCMC) addresses solid waste management in Chapter 5.01. Section 5.01.010 through 5.01.040 require that: (1) only refuse containers provided or authorized by the City shall be utilized: 2) separate containers are to be provided for Class III solid waste, recyclables, and green waste; 3) new commercial construction must have refuse containers within an enclosed container area that is cement paved and enclosed with 6-foot-high masonry walls with a minimum 6-foot-wide opaque door for ready removal of the containers; and 4) solid and recycling waste material handling comply with the Environmental Programs and Operation Division's exclusive franchise for services. Per CCMC Section 5.01.100, City Building and Demolition Permits are issued with the condition that the permittee agrees to abide by the provisions of Chapter 5.01.

City of Los Angeles

Los Angeles General Plan Framework Element

The City's General Plan Framework Element (Framework Element), adopted in August 2001, includes general guidance regarding land use issues, and includes direction on infrastructure and public services. The Framework Element includes an Infrastructure and Public Services Chapter, which responds to federal and State mandates to plan for adequate infrastructure in the future. The Framework Element supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[9] The Framework Element addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program and composting). Furthermore, the Framework Element states that for these programs to succeed, the City should locate businesses where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The Framework Element indicates that more transfer facilities will be needed to dispose of waste at remote landfill facilities due to the continuing need for solid waste transfer and disposal facilities, as well as the limited disposal capacity of the landfills in Los Angeles.

6 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, October 2021.

7 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 46.

8 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021.

9 City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996, and readopted August 8, 2001, pp. 9 through 11.

Several landfill disposal facilities accessible by truck and waste-by-rail landfill disposal facilities that could be used by the City are identified to meet its disposal needs.[10]

Los Angeles Green Building Ordinance

On December 17, 2013, the Los Angeles City Council approved Ordinance No. 182,849, which amended Chapter IX, Article 9 of the LAMC to reflect local administrative changes and incorporate by reference portions of the CALGreen Building Code. The amended Article 9 is referred to as the "Los Angeles Green Building Code." Projects must comply with the Los Angeles Green Building Code as amended to comply with various provisions of the CALGreen Building Code. The Los Angeles Green Building Code creates a set of development standards and guidelines to further energy efficiency and reduction of greenhouse gases. It builds upon and sets higher standards than those incorporated in the CALGreen Building Code and is implemented through the building permit process.

Los Angeles Space Allocation Ordinance

Pursuant to the California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327), the City enacted the Space Allocation Ordinance (Ordinance No. 171,687) on August 13, 1997, which is incorporated in various sections of the Los Angeles Municipal Code (LAMC). The Space Allocation Ordinance requires the provision of an adequate recycling area or room for collecting and loading recyclable materials in all new construction projects, all existing multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and all other existing development projects where the addition of floor area is 30 percent or more.

Los Angeles Citywide Construction and Demolition Debris Recycling Ordinance

On March 5, 2010, the City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) that requires the City of Los Angeles Bureau of Sanitation (LASAN) to ensure that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor. The ordinance became effective in January 2011.[11] These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.[12] Additionally, compliance with the Ordinance and LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including construction and demolition (C&D) waste, would be recycled.

Los Angeles Solid Waste Integrated Resources Plan

LASAN developed the Solid Waste Integrated Resources Plan (SWIRP) also known as the "Zero Waste Plan," a 20-year master plan to reduce solid waste, increase recycling, and manage trash in

[10] City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996, and readopted August 8, 2001.

[11] City of Los Angeles Bureau of Sanitation (LASAN), Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

[12] City of Los Angeles, Ordinance No. 181,519, March 5, 2010.

the City through the year 2030.[13] This plan encompasses on-going solutions and programs (e.g., blue and green bin recycling, multi-family recycling, restaurant food scrap diversion, alternative technologies, hazardous waste recycling, Los Angeles Unified School District recycling program), as well as new programs to be implemented during the planning horizon. In addition, the SWIRP is the result of a mayoral directive that is in line with the City Council's RENEW LA plan, as discussed further below.[14] In May 2008, the stakeholders of the Zero Waste Plan adopted the Solid Waste Integrated Resources Plan guiding principles to help the City achieve its zero waste goals by 2030.[15] The Solid Waste Integrated Resources Plan is intended to provide a long-term outline of the policies, programs, infrastructure, regulations, incentives, new green jobs,[16] technology, and financial strategies necessary to achieve 90-percent diversion of solid waste by 2025.[17] The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycled/reused materials. As noted by the City, "zero waste" is a goal and not a categorical imperative; the City is seeking to come as close to "zero waste" as possible. Based on the 2013 Zero Waste Progress Report and using the calculation methodology adopted by the State of California, the City achieved a landfill diversion rate of approximately 76 percent in 2012, exceeding Los Angeles Mayor Villaraigosa's goal.[18]

Los Angeles RENEW LA Plan

RENEW LA was adopted by the City Council in March 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery.[19] This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent by 2025.[20] The plan focuses on combining key elements of existing reduction and recycling programs and infrastructure with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, and renewable fuels, chemicals, and energy. The RENEW LA Plan also calls for reductions in the quantity of residual materials disposed in landfills and their associated environmental impacts

Los Angeles Citywide Exclusive Franchise System for Municipal Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System

Solid waste collection, management, and disposal in the City are handled both by LASAN crews and by various permitted private solid waste haulers. The City provides solid waste collection, recycling, and green waste collection services primarily to single-family uses and multi-family uses

13 LASAN, Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015.

14 LASAN, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.

15 City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.

16 "Green jobs" is the term for work force opportunities created by companies and organizations whose mission is to improve environmental quality.

17 LASAN, SWIRP A Zero Waste Master Plan, 2013.

18 LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl state=sc2bv57ho_78&_afrLoop=302690459702255&_afrWindowMode=0&_afrWindowId=ival6l59y#!%40%40%3F_afrWindowId%3Dival6l59y%26_afrLoop%3D302690459702255%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82. Accessed February 24, 2022.

19 Los Angeles Municipal Code, City Ordinance No. 184,665.

20 Los Angeles Municipal Code, City Ordinance No. 184,665.

with four units or less. Private solid waste haulers collect from most multi-family residential uses with four or more units and commercial uses based on an open permit system. Permitted waste haulers must obtain an annual permit, submit an annual report, and pay quarterly fees. However, unlike LASAN, private waste haulers are not required to provide recycling services, operate clean fuel vehicles, offer similar costs for similar services, or reduce vehicle miles traveled. Thus, the existing open permit system limits the ability of the City to address compliance with State environmental mandates and the City's waste diversion goals. Although the City has obtained a 76-percent solid waste diversion rate as identified in the 2013 Zero Waste Progress Report, [21] nearly three million tons of solid waste from the City are still disposed in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.[22]

To respond to these challenges, and in response to City Council directive, LASAN established Zero Waste LA, a new public-private partnership designed to address the three million tons of waste disposed annually by businesses, consumers and residents.[23] This innovative franchise system establishes a waste and recycling collection program for all commercial, industrial, and large multifamily customers in the City of Los Angeles. In April 2014, the Mayor and City Council approved the ordinance that allowed the City to establish an exclusive franchise system with 11 zones. With a single trash hauler responsible for each zone, the franchise system l allows for the efficient collection and sustainable management of solid waste resources and recyclables. Among other requirements, the City mandates maximum annual disposal levels and specific diversion requirements for each franchise zone to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. This program began in July 2017.

Existing Conditions

Project Site Solid Waste Generation

As described in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently improved with single-story warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. The Culver City Parcel is currently developed with two warehouse buildings: (1) a 9,739-square-foot (sf) building that is currently used for storage; and (2) a 9,082-sf building that is currently vacant. The Los Angeles Parcel is currently improved with an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. As indicated in **Table 4.14.3-1**, *Estimated Existing Solid Waste Generation at the Project Site*, the existing on-site uses currently generate an estimated 448 tons per year of Class III solid waste. This number does not take into account the amount of solid waste diverted as the result of required compliance with source reduction and recycling programs. The CoIWMP assumes an ongoing diversion rate of 65

21 LASAN, Zero Waste Progress Report, March 2013.

22 LASAN, Zero Waste Progress Report, March 2013.

23 LASAN, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

percent Countywide.[24] With diversion, the existing on-site uses would generate 157 tons per year of Class III solid waste for disposal in the landfills.

TABLE 4.14.3-1
ESTIMATED EXISTING SOLID WASTE GENERATION AT THE PROJECT SITE

Land Use	Quantity	Generation Factor[a]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Culver City Parcel				
Storage[b]	9,739 sf	N/A	N/A	N/A
Vacant[c]	9,082 sf	N/A	N/A	N/A
Los Angeles Parcel				
Office	51,500 sf (155 emp)[d]	2.02 tons/emp/year	312	1,710
Retail	34,726 sf (69 emp)[d]	1.96 tons/emp/year	136	746
Total (Pre-Diversion)			**448**	**2,456**
Total (Post-Diversion)			**157**	**860**

NOTE(S): lbs = pounds; sf = square feet; emp = employees.

[a] Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups. Accessed February 24, 2022. https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates.

[b] Storage uses are assumed to generate no solid waste.

[c] The vacant uses within the Culver City Parcel would not generate solid waste.

[d] Employees calculated using Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning: office = 3 employees per thousand sf; retail = 2 employees per thousand sf.

SOURCE: ESA, 2022

Solid Waste Generation and Collection

Solid waste management in both the City of Culver City and City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities.

City of Culver City

Per CCMC Section 5.01.01, solid waste handling and recyclable waste material handling shall be performed exclusively by the City or its authorized agents. In accordance with this section, all trash collection in the City is managed by the City's Public Works Department (PWD), Environmental Programs and Operations Division (EPO), with all residential, commercial and industrial solid waste in the City collected by the EPO or its authorized agents. The EPO also provides a curbside

[24] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 28.

recycling program for paper, cardboard, cans/aluminum, plastic, and glass, with recyclable and green waste hauled to private recycling facilities.[25]

City of Los Angeles

LASAN is responsible for developing strategies to manage solid waste collection and disposal in the City. LASAN primarily collects solid waste generated by single-family dwellings, most small multi-family dwellings usually consisting of four units or fewer, and public facilities. Private hauling companies contracted with the City primarily collect solid waste generated by larger multi-family residential, commercial, and industrial properties.

Solid Waste Disposal

Both the City of Culver City and the City of Los Angeles do not own or operate any landfills; the majority of solid waste generated in both cities is disposed of at County landfills. Per the CoIWMP 2020 Annual Report, while the economy has continued to grow in recent years, the amount of waste that residents and businesses generated and disposed of in the County remained relatively low.[26] The CoIWMP 2020 Annual Report shows a downward disposal trend from 2009 to 2011 with a plateau between 2011 through 2014, an increase from 2014 to 2018 and another slight plateau from 2018 to the present.[27] In 2020, the most recent year for which reported data is available, the County disposed of approximately 11 million tons of materials, compared to approximately 11.5 million tons in 2007, resulting in an overall reduction of approximately 500,000 tons of solid waste. [28] Based on these reductions, the CoIWMP assumes an ongoing diversion rate of 65 percent Countywide.[29] The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's AB 341 75 percent recycling goal. The 2020 average daily disposal for in-county landfills was 19,291 tons per day (tpd) and the maximum daily capacity was 45,297 tpd.[30]

The CoIWMP 2020 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2035 through scenarios that include meeting CalRecycle's statewide disposal target, meeting Senate Bill 1383 organic waste disposal reduction targets, and all solid waste management options considered become available, a shortfall in disposal capacity is not expected to occur during this scenario during the 15-year planning period.[31]

Class III Landfills

Class III landfills accept non-hazardous municipal solid waste. There are 10 Class III landfills in the County, which collectively accept the majority of solid waste generated in the County

[25] City of Culver City website, Trash & Recycling, http://www.culvercity.org/live/home-property/residential-recycling-trash-services/trash-collections. Accessed March 14, 2022.
[26] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 5.
[27] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 5, Figure 1, Disposal Trend.
[28] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 27.
[29] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 28.
[30] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.
[31] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021.

(approximately 6,018,869 tons in 2020), followed by exports to out-of-County landfills in Orange, Riverside, San Bernardino, Ventura, and Kern Counties (4,544,808 tons in 2020) and transformation facilities (337,989 tons in 2020).[32] The remaining disposal capacity for the County's Class III landfills is estimated at approximately 142.67 million tons as of December 31, 2020.[33]

Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of non-hazardous solid waste disposal materials (i.e., Class III waste materials). The maximum daily capacity for the landfill is approximately 12,100 tpd, and the 2020 average daily disposal was approximately 7,907 tpd. As of December 31, 2020 Sunshine Canyon landfill had a remaining capacity of approximately 54.08 million tons and a remaining life expectancy of approximately 17 years.[34]

Unclassified Landfills

Unclassified landfills accept C&D waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2020, the amount of inert waste materials disposed Countywide was 321,830 tons.[35]

As of 2020, there is only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit, which is the Azusa Land Reclamation Landfill.[36] The remaining capacity of this landfill is estimated at 51.71 million cubic yards (64.64 million tons) with a projected closure date of 2045.[37]

In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, collectively processing approximately 3.35 million tons in 2019.[38]

Waste Diversion and Recycling

As described in the Regulatory Framework, under AB 341, all cities and counties in the State had a goal to divert 75 percent of their solid waste streams from landfills by 2020.[39] The County and multiple cities in the County (including the City of Culer City and City of Los Angeles) have a diversion rate at 65 percent according to the CoIWMP 2020 Annual Report, the latest report available.

City of Culver City

The City of Culver City achieved a 70 percent diversion rate in 2015 as a result of a combination of measures required in the City's Source Reduction and Recycling Element (SRRE). For purposes of compliance with SB 1016, CalRecycle compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day with a target specified for each city, county, or

32 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 28.
33 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 35.
34 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.
35 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 27.
36 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 36.
37 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 36.
38 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 33.
39 California Public Resources Code, Sections 41730 et seq.

regional agency with a CalRecycle-approved planning document. The specific targets for the City of Culver City are 8.9 pounds/resident/day and 8.3 pounds/employee/day. In 2020, the City of Culver City did not exceed these targets and had a per capita disposal of 7.0 pounds/resident/day and 4.9 pounds/employee/day.[40]

City of Los Angeles

In 2001, the City adopted a 70 percent diversion rate goal by 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new "zero waste-to-landfill" goal (zero waste) by the year 2025. The City had a diversion rate of 20.6 percent in 1990, 46 percent in 1995, 65.2 percent in 2000, and 67.1 percent by year 2005. By the end of 2011, the City achieved a diversion rate of 76.4 percent.[41] In 2011, the last reported year available, the City generated nearly 16 million tons of potential solid waste.[42] Of this total, the City diverted approximately 12.2 million tons (76.4 percent) from disposal into landfills.[43] In 2020, the City of Los Angeles had a per capita disposal of 5.80 pounds/resident/day and 13.20 pounds/employee/day, as calculated by CalRecycle for purposes of compliance with SB 1016.[44]

4.14.3.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to solid waste if it would:

- **SW-1:** 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; or
- **SW-2:** Not comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Methodology

The analysis of solid waste impacts addresses the amount of solid waste that would be generated by the Project during both construction and operations, and whether sufficient landfill capacity is available to accommodate the projected volumes of waste so as to not exceed State or local standards or otherwise impair the attainment of solid waste reduction goals. The existing and projected amount of solid waste generated is determined by using a per unit waste generation factor for the various uses, which is derived from relevant guidance documents from CalRecycle and the United States Environmental Protection Agency (EPA). The amount of solid waste currently generated by the existing uses on the Project Site is subtracted from the projected amount of solid waste to determine the net increase in waste that would be caused by the Project. The analysis focuses on waste generation rates rather than disposal rates, which are reduced significantly by

40 CalRecycle, Jurisdiction Per Capita Disposal Trends – Culver City, for reporting year 2020, December 16, 2021.

41 City of Los Angeles, Zero Waste Progress Report, March 2013, p. 7.

42 4.2 pounds per person per day x 3,806,411 persons = 15,986,926 tons of potential solid waste based on data from the City of Los Angeles Zero Waste Progress Report, March 2013, p. 8.

43 Diversion statistic based on data in generation data included in the City of Los Angeles, Zero Waste Progress Report, March 2013. Generation for 2011 (15,986,926 tons of potential solid waste) x 2011 diversion rate (76.4 percent) totals approximately 12.2 million tons of diverted waste materials.

44 CalRecycle, Jurisdiction Per Capita Disposal Trends – Los Angeles, for reporting year 2020.

State and local diversion programs, and thus provides a conservative analysis of the impacts on solid waste facilities that would be caused by the Project. The availability of landfill capacity is taken directly from the CoIWMP 2020 Annual Report. The Project's net increase in waste is compared to existing and planned capacities to determine the Project's potential impact.

Project Design Features

No specific project design features are proposed with regard to solid waste.

Analysis of Project Impacts

Threshold SW-1: Would the Project 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?

Impact Analysis

Construction

Project construction would include the demolition of approximately 105,047 sf of existing buildings, approximately 3,606 cubic yards (cy) of existing hardscape; approximately 1,000 cy of existing vegetation; the export of approximately 290,000 cy of excavated soil (associated with excavation for new building foundations and subterranean parking); and new construction totaling approximately 536,000 sf. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's inert landfill site, Azusa Land Reclamation Landfill, or one of a number of inert debris engineered fill operations that are located throughout the County. Note that any contaminated soil that is found during excavation is assumed to be diverted to the Chiquita Canyon Landfill.

Table 4.14.3-2, *Estimated C&D Solid Waste Generation*, provides an estimate of the amount of C&D debris that would be generated during Project construction.

As shown in Table 4.14.3-2, Project C&D activities would generate an estimated 443,993 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City of Los Angeles's Green Building Code (e.g., use of recyclables in building construction, etc.).

In compliance with the requirements of SB 1374, the Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Assuming the required C&D diversion rate of 75 percent per SB 1341, the Project is estimated to generate a total of approximately 437,248 tons of C&D waste. Additionally, the Project's construction contractor would deliver all C&D waste generated by the Project to a certified C&D Waste Processing Facility in accordance with AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

TABLE 4.14.3-2
ESTIMATED C&D SOLID WASTE GENERATION

Land Use	Quantity	Generation Factor[a]	Solid Waste Generation (tons)
Site Preparation			
Building Demolition Material	105,047 sf (2,594 cy)	400 lbs/cy	519
Hardscape Demolition	3,606 cy	2,400 lbs/cy	4,327
Vegetation	1,000 cy	3,000 lbs/cy	1,500
Site Preparation Subtotal			*6,346*
Building Construction			
Total New Building Area	536,000 sf (13,235 cy)	400 lbs/cy	2,647
Building Construction Subtotal			*2,647*
Total (Pre-Diversion)			**8,993**
Total (Post-Diversion)			**2,248**
Exported Soil[b]	290,000 cy	3,000 lbs/cy	435,000
Total Pre-Diversion + Exported Soil			**443,993**
Total Post-Diversion + Exported Soil			**437,248**

NOTE(S): lbs = pounds; cy = cubic yards; sf = square feet.

[a] Generation factors are provided by CalRecycle's Solid Waste Cleanup Program Weights and Volumes for Project Estimates. Accessed March 2, 2022. https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/.

[b] Note that exported soil is not part of the required C&D diversion. As such, it is reflected separately in this table.

SOURCE: ESA, 2022.

Project construction waste would be hauled by permitted haulers and taken only to certified C&D processing facilities that are monitored for compliance with recycling regulations. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation Landfill. Given that the remaining disposal capacity of the Azusa Land Reclamation Landfill is approximately 51.71 million cubic yards (64.64 million tons),[45] the Project's estimated total solid waste disposal needed during construction after 75 percent diversion represents approximately 0.68 percent of the estimated remaining capacity at the Azusa Facility. This is a conservative estimate as it does not take into account the additional capacity provided by inert debris engineered fill operations.

Based on the above, Project construction would not 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, and impacts would be less than significant.

Operation

Estimated solid waste generation for Project operation is shown in **Table 4.14.3-3**, *Estimated Operational Solid Waste Generation*. As indicated therein, it is estimated that the Project would

[45] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 36.

generate a net increase of approximately 4,691 tons of solid waste per year over and above existing conditions. This estimate does not take into account the amount of solid waste that would be diverted via source reduction and recycling programs within the City of Culver City and City of Los Angeles. Countywide, the CoIWMP assumes an ongoing diversion rate of 65 percent.[46] While the City of Culver City achieved a 70 percent diversion rate in 2015 and the City of Los Angeles achieved a 76.4 diversion rate in 2011, this analysis conservatively assumes a diversion rate of 65 percent that was achieved by the County. Given this County diversion rate, Project operation would generate a net increase of 1,642 tons of solid waste per year requiring landfill disposal.

TABLE 4.14.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity	Generation Factor[a]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Office	536,000 sf (2,400 emp)[b]	2.02 tons/emp/year	4,848	26,564
Existing Uses				
Existing	86,226 sf (224 emp)[c]		(157)	(860)
Net Increase (Pre-Diversion)			**4,691**	**25,704**
Net Increase (Post-Diversion)[d]			**1,642**	**8,996**

NOTE(S): sf = square feet; emp = employee; lbs = pounds.

[a] Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups. Accessed February 24, 2022. https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates.

[b] Number of employees for both Building 1 and Building 2 provided by the Applicant.

[c] Existing subtotal is taken from Table 4.14.3-1. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

[d] Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent.

SOURCE: ESA, 2022.

The Project's estimated annual pre-diversion solid waste generation of 4,691 tons requiring landfill disposal represents approximately 0.04 percent of the County's 2020 annual waste generation of 11,401,870 tons per year and approximately 0.003 percent of the remaining 142.67-million-ton capacity in 2020 in the County's Class III landfills. With diversion, the Project's annual solid waste generation that requires landfill disposal would represent approximately 0.01 percent of the County's annual waste generation and approximately 0.001 percent of the remaining capacity in 2020.

The County expects that approximately 85,093,440 additional tons of the remaining 142.67-million-ton capacity would be used in 2026, the earliest anticipated year of Project buildout.[47] This

[46] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, p. 28.

[47] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

would leave an available capacity of 57,576,560 tons in 2026, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project's estimated annual pre-diversion solid waste generation would represent approximately 0.01 percent of the remaining capacity in 2026. The Project's annual solid waste generation requiring landfill disposal, with diversion, would represent approximately 0.003 percent of the remaining capacity in 2026.

As previously stated, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste. The maximum daily capacity for this landfill is 12,100 tpd, and the 2020 disposal rate was 7,907 tpd, indicating a remaining daily capacity of 4,193 tpd of capacity. If all of the Project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's net addition of 15 tpd[48] would represent 0.4 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65 percent rate, this percentage would drop to approximately 0.1 percent.

As described in the CoIWMP 2020 Annual Report, future disposal needs over the next 15-year planning horizon (2035) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by both the City of Culver City and City of Los Angeles for this service area. Upon buildout, the Project would require the addition of a solid waste collection route for weekly service by EPO (for the Culver City Parcel) and LASAN (for the Los Angeles Parcel) (i.e., private haulers under contract to EPO and LASAN). The Project would not require the expansion or construction of a new solid waste disposal or recycling facility to handle Project-generated waste because the existing facilities have enough capacity to receive the Project's waste.

Based on the above, the Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County.

Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not 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, and impacts would be less than significant.

[48] The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal is calculated by 4,691 net tons / 312 days = 15 net tons per day.

Mitigation Measures

Impacts regarding solid waste were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Level of Significance After Mitigation

Impacts regarding solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold SW-2: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed in the Initial Study (Appendix A of this Draft EIR), 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. Less-than-significant impacts would occur related to Threshold SW-2. No further analysis is required.

Cumulative Impacts

Impact Analysis

Solid waste disposal in California is a regional issue administered by regional agencies, and for the Project, it is administered by the County. As discussed above, the State requires that the Countywide Siting Element, required as part of a jurisdiction's comprehensive solid waste management program, show the provision of a minimum of 15 years of combined disposal capacity through existing or planned solid waste disposal and transformation facilities, or through additional strategies. Projected growth is included in the analysis and the required Annual Report updates the disposal demand and supply each year for the following 15-year period. The CoIWMP 2020 Annual Report anticipates an approximately 6.5 percent increase in population growth within the County of Los Angeles by 2035 and an increase of 20.7 percent in employment.[49] The cumulative development in the Project area would contribute an increment of the overall projected demand for waste disposal. Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 52 related projects within both the City of Culver City and City of Los Angeles, all of which would contribute waste to County landfills and to the demand for solid waste disposal during construction and operation.

Solid Waste Capacity

Construction

Similar to the Project, the related projects within the vicinity would generate C&D waste and that waste would be recycled to the extent feasible. The C&D waste resulting from construction activities for the related projects is unknown and unquantifiable as each related project would result in differing amounts of demolition and soil excavation. The C&D waste would be disposed of at the County's Azusa Land Reclamation Landfill or one of the inert debris engineered fill operations

[49] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

located in the County. As indicated above, the remaining capacity of the Azusa Land Reclamation Landfill is estimated at 51.71 million cubic yards (64.64 million tons). Additional capacity would also be provided by inert debris engineered fill operations or the potential for reuse rather than disposal of exported soil. Given this available future capacity, it is expected that all C&D waste can be accommodated during that time, and cumulative impacts regarding the disposal of C&D waste would not occur.

Additionally, similar to the Project, construction waste would be hauled by permitted haulers and taken only to certified C&D processing facilities that are monitored for compliance with recycling regulations. The related projects would also be required to comply with SB 1374, which requires the related projects to implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. The related projects' respective construction contractors would deliver all C&D waste generated by those projects to a certified C&D Waste Processing Facility in accordance AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Moreover, the CoIWMP 2020 Annual Report concludes that there is adequate capacity in permitted solid waste facilities to serve the County through the 15-year planning period of 2020 through 2035.[50] For these reasons, the Project and related projects would not 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. Accordingly, the Project's contribution to cumulative impacts would not be cumulatively considerable. Cumulative impacts would be less than significant**.**

Operation

As shown in **Table 4.14.3-4**, *Estimated Cumulative Operational Solid Waste Generation*, the estimated solid waste requiring landfill disposal for all 52 related projects, not accounting for diversion and recycling, would be 23,094 tons per year or 126,545 pounds per day. The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be 27,786 tons per year or 152,250 pounds per day. Again, these estimates do not take into account the amount of solid waste that would be diverted via source reduction and recycling programs, assumed by the County to be approximately 65 percent.

As the County's Class III landfills serve the entire County of Los Angeles, the Project plus the 52 related projects would represent only a small portion of the overall regional service area. The solid waste generation by the Project and related projects represents only a fraction of the available capacity that could be accommodated at the landfills serving them. The cumulative annual solid waste generation, without accounting for diversion, would be a negligible increment of the County's annual waste generation of 11,401,870 tons per year (0.2 percent) and remaining 142.67-million-ton capacity in the County's Class III landfills (0.02 percent). Accordingly, the cumulative contributions of the Project plus the related projects would not approach, much less exceed, the available capacity of existing facilities.

[50] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021.

TABLE 4.14.3-4
ESTIMATED CUMULATIVE OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity[a]	Generation Factor[b]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Residential	3,655 du	0.87 tons/du/year	3,180	17,424
Commercial[c]	165,136 sf (743 emp)	1.96 tons/emp/year	1,457	7,982
Office	2,106,239 sf (8,425 emp)	2.02 tons/emp/year	17,018	93,252
School[d]	19,054 students (2,858 emp)	0.45 tons/emp/year	1,286	7,047
Other Services[e]	189,212 sf (141 emp)	1.09 tons/emp/year	154	841
Cumulative Subtotal (without Project)			**23,094**	**126,545**
Project (net increase)[f]			**4,691**	**25,705**
Cumulative Total (with Project)			**27,786**	**152,250**

NOTE(S): lbs = pounds; sf = square feet; du = dwelling unit; emp = employees.

[a] Number of employees per use, as applicable, are calculated in Appendix Q of this Draft EIR.

[b] Generation factors provided by are CalRecycle's Disposal and Diversion Rates for Business Groups. Accessed February 24, 2022. https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates.

[c] Commercial uses include retail, restaurant, commercial, fitness center, cannabis retail, and coffee shop uses.

[d] Schools include daycares, universities, and art school uses.

[e] "Other Services" includes various uses that do not have specific generation rates, such as Theater, Warehouse, and Studio uses.

[f] Project amount is taken from Table 4.14.3-3 of this section.

SOURCE: ESA, 2022.

As noted above, the CoIWMP 2020 Annual Report indicates that in-County and out-of-County facilities would adequately meet future disposal needs over the next 15-year planning horizon (2035) through a number of strategies that would be carried out during that period. Through planning horizon year 2035, the County expects total solid waste generation Countywide to total approximately 211,116,823 tons, which accounts for the 65 percent diversion.[51]

The approximately 27,786 tons of solid waste per year estimated to be generated by the Project and 52 related projects (pre-diversion) would account for approximately 0.02 percent of the County's expected total solid waste generation through 2035. Assuming a diversion rate of 65 percent, the Project and 52 related projects would generate approximately 9,023 tons[52] requiring disposal, which would account for approximately 0.01 percent of the County's expected total solid waste generation through 2035. Therefore, solid waste generation by the Project and 52 related projects would leave available capacity in 2035 to serve the County.

As discussed above, Project-level impacts related to solid waste disposal would be less than significant. The CoIWMP accounts for cumulative waste generation for the 15-year planning period

[51] County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

[52] 27,786 X 0.35 = 9,725

ending in 2035, as the analysis includes projected growth. Therefore, cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity. The Project and related projects would not 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. Accordingly, the Project's contribution to cumulative impacts would not be cumulatively considerable. Cumulative impacts on solid waste would be less than significant.

Mitigation Measures

Cumulative impacts regarding solid waste were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Level of Significance After Mitigation

Cumulative impacts with regard to solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.14.4 Electric Power, Natural Gas, and Telecommunications Facilities

4.14.4.1 Introduction

The following section analyzes the Project's potential impacts upon electric power, natural gas and telecommunications facilities. This section focuses on the existing facilities serving the project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the Project. This analysis utilizes the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared for the Project by KPFF Consulting Engineers, dated June 2022, included as Appendix P of this Draft EIR. Potential impacts associated with energy demand and energy conservation policies are discussed in Section 4.4, *Energy*, of this Draft EIR.

4.14.4.2 Environmental Setting

Regulatory Framework

There are several plans, policies, and programs regarding Electric Power and Natural Gas Facilities at the federal and state levels. Described below, these include:

- United States Department of Energy (Energy Policy Act of 2005)
- Federal Communications Commission
- California Independent System Operator
- California Public Utilities Commission
- California Energy Commission
- Senate Bill 1389
- Culver City Municipal Code
- Culver City Municipal Code Section 11.20
- Culver City Clean Power Alliance
- Culver City Information Technology Department
- Los Angeles Municipal Code Section 10.5.4
- Los Angeles Green Building Code
- Los Angeles Green New Deal
- Los Angeles Information Technology Agency

Federal

United States Department of Energy (Energy Policy Act of 2005)

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and

electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state-level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

Federal Communications Commission

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs. The majority of State regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section 4.4, *Energy*, of this Draft EIR. Regulations pertaining to infrastructure are discussed below.

California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUC's jurisdiction.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the State senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines, and permitting of electrical transmission and substation facilities.

California Energy Commission

The CEC is a planning agency which provides guidance on setting the State's energy policy. The CEC's responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the State, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The 2021 Integrated Energy Policy Report, the latest report published by the CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.[1]

Local

City of Culver City

Culver City Municipal Code

The City of Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to the Culver City Municipal Code (CCMC) Chapter 15.02.1005, the City requires 1 kilowatt (kw) of photovoltaic (PV) power installed per 10,000 square feet (sf) of new development. The CCMC includes an option to pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. Under Chapter 17.320.035 of the CCMC, the City goes beyond California Green Building Standards (CALGreen) Building Code standards and requires at least 20 percent electric vehicle (EV) capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.[2] Additionally, Sections 4.408.1 and 5.408.1 Construction Waste Management require the recycle and/or salvage for reuse a minimum of 75 percent of nonhazardous construction and demolition waste.

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1 California Energy Commission (CEC), *2021 Integrated Energy Policy Report*, February 22, 2022.

2 City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 12, 2022.

In 2009, the City adopted the Green Building Program as CCMC Chapter 15.02.100, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting has to be either fluorescent, LED or other type of high-efficiency lighting, and specific features for parking garages would require all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

Culver City Municipal Code Section 11.20

Section 11.20 of the Culver City Municipal Code outlines rules and regulations related to telecommunications installation within Culver City. The intent of the Code is to:

1. To enable the City to discharge its public trusts in a manner consistent with rapidly evolving federal and state regulatory policies, industry competition, and technology development.
2. To authorize and to manage reasonable access to the City's public right-of-way and public property for telecommunications purposes on a competitively neutral and nondiscriminatory basis.
3. To obtain fair and reasonable compensation for the City and its residents for authorizing the private use of the public rights-of-way and public property, which are recognized to be valuable public assets, held in trust by the City.
4. To foster and to promote competition in telecommunications services, minimize unnecessary local regulation of telecommunications service providers, and encourage the delivery of advanced and competitive telecommunications services on the broadest possible basis to local government and to the businesses, institutions and residents of the City.
5. To establish clear local guidelines, standards and time frames for the exercise of local authority with respect to the regulation of telecommunication service providers, including establishment and enforcement of consumer service standards and technical standards.
6. To encourage the profitable deployment of advanced telecommunications infrastructures that satisfy local needs, deliver enhanced government services, and provide informed consumer choices in an evolving telecommunication market.

Culver City Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Culver City. With this change, CPA purchases the renewable energy resources for electricity and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA to remain with SCE as their provider. The Project's energy analyses conservatively assume the Project will remain with SCE as their electricity provider and does not take additional credit for renewable energy beyond the

expected SCE renewable energy percentage for year 2022 based on the required renewables by year 2024 under SB 100.[3]

Culver City Information Technology Department

The City of Culver City Information Technology Department (IT) is responsible for providing computing, telecommunications, and network service to all departments and divisions within the City. IT provides project management, systems planning, design, and programming support for the enhancement of existing and new systems.[4]

IT also provides high-speed fiber-optic internet cables for Culver City businesses to promote economic development. Culver City's municipal fiber network, known as Culver Connect, has a 21.7-mile network backbone in three geographical network rings interconnected by "ring ties" of approximately 3.1 route miles of fiber. The network backbone is comprised of 576 strands of entirely undergrounded fiber. There are three hub facilities located in the City that house City-owned network electronics. The City leases two fiber connections to carrier hotels at One Wilshire in Los Angeles and Equinix (LA3) in El Segundo.

City of Los Angeles

Los Angeles Municipal Code Section 10.5.4

Section 10.5.4 of the City of Los Angeles Municipal Code states that telecommunications providers are required to comply with all City, state, and federal regulations during installation and operation of equipment. Additionally, each lease, sublease, or license facilitated by telecommunications providers are required to seek approval from the City.

Los Angeles Green Building Code

Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the "Los Angeles Green Building Code," which incorporates by reference portions of the CALGreen Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details.

Los Angeles Green New Deal

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic,

[3] For the purposes of estimating energy demand, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section.

[4] City of Culver City, Information Technology, https://www.culvercity.org/City-Hall/Departments/IT. Accessed July 12, 2022.

environmental, and equity objectives.[5] Los Angeles' Green New Deal is the first four-year update to the City of Los Angeles' first Sustainable City pLAn that was released in 2015 and therefore replaces and supersedes the Sustainable City pLAn.[6] It augments, expands, and elaborates in more detail Los Angeles' vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals.

Within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square foot for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 thousand British thermal units per square foot (mBTU/sf) in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the City to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds (lbs.) of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

5 City of Los Angeles. LA's Green New Deal, 2019.
6 City of Los Angeles, Sustainable City pLAn, 2015.

Los Angeles Information Technology Agency

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of technology services related to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as a TV station (LA CityView), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

ITA's Video Services Regulatory Division advises the Mayor and City Council on certain issues relating to video/cable TV services and private telecommunications franchises. The Division regulates and monitors the compliance of video/cable TV services and franchises issued by the CPUC. More specifically, it ensures that video/cable TV service providers comply with local, state and federal laws and oversees the video/cable TV service interests of City residents.

Existing Conditions

The Project Site is comprised of two properties on approximately 4.46 acres of land. 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. As detailed in Section 4.4, *Energy*, it is estimated that the existing site currently uses 1,217,631 kWh of electricity and 1,058,301 cubic feet (cf) of natural gas on an annual basis.

Electric Power

Electric Supplies – SCE

SCE provides electrical services to approximately 15 million people, 15 counties, and 180 incorporated cities, including the City of Culver City and a portion of the Project Site. It also provides services to approximately 5,000 large businesses, and 280,000 businesses throughout a 50,000-square-mile service area, across central, coastal and Southern California, an area bounded by Mono County to the North, Ventura County to the West, San Bernardino County to the East, and Orange County to the South.[7] SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 megawatts), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 megawatts), and geothermal sources. The annual electricity sale to customers in 2020 was approximately 82,048,000 megawatt-hours.[8]

Electricity Distribution System – SCE

The power supplied to SCE consumers is distributed through a network of approximately 104,000 miles of circuits, 700 substations, and approximately 1.5 million power poles.[9]

7 Southern California Edison (SCE), Who We Are, https://www.sce.com/about-us/who-we-are. Accessed July 12, 2022.
8 Edison International and SCE, 2019 Annual Report, March 2020, p. 2.
9 SCE, About Us, 2022, https://www.sce.com/about-us/reliability. Accessed July 12, 2022.

Electric Supplies – LADWP

The LADWP provides electrical service throughout the City of Los Angeles, including a portion of the Project Site, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 7,531 megawatts.[10] On August 31, 2017, LADWP's power system experienced a record net energy-for-load peak demand of 6.431 megawatts.[11] Approximately 34 percent of LADWP's 2019 electricity purchases were from renewable sources, which is similar to the 31.7 percent statewide percentage of electricity purchases from renewable sources.[12] The annual electricity sale to customers for the 2018–2019 fiscal year was approximately 22,663 million kilowatt-hours (kWh).[13]

Electricity Distribution System – LADWP

The power supplied to LADWP consumers is distributed through a network of approximately 6,752 miles of overhead distribution lines and approximately 3,626 miles of underground distribution lines.[14]

Natural Gas

Natural Gas Supplies

As discussed in Section 4.4, *Energy*, of this Draft EIR, SoCalGas provides natural gas resources to the City and most of Southern California and Central California from the City of Visalia to the U.S./Mexican border.[15] The availability of natural gas is based upon present conditions of gas supply and regulatory policies as SoCalGas is under the jurisdiction of the CPUC and other federal regulatory agencies. In addition, SoCalGas makes available to its customers energy-efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

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10 Los Angeles Department of Water and Power (LADWP), *2017 Power Strategic Long-Term Resource Plan*, December 31, 2017, p. 17.

11 LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 12, 2022.

12 LADWP, 2019 Power Content Label, Version: October 2020.

13 LADWP, 2017 Retail Electric Sales and Demand Forecast, September 15, 2017, p. 14.

14 LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 12, 2022.

15 Southern California Gas Company (SoCalGas), Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 12 ,2022.

Natural Gas Distribution Systems

Interstate Distribution Systems

Natural gas is supplied to the Southern California region through a system of interstate pipelines. The 2020 California Gas Report projects that California natural gas demand is expected to decline at an annual rate of one percent per year from 2020 to 2035 in the SoCalGas service area.[16] Gas supply available to SoCalGas from California sources averaged 3,175 million cf per day or 3,292,475 million British thermal units (MMBtu) per day in 2020. This equates to an annual average of 1,158,875 million cf per year or 1,201,753,375 MMBtu per year.[17]

Local Distribution System

SoCalGas provides natural gas resources to the City of Los Angeles and City of Culver City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas' policies and extension rules of the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets.

Telecommunication Facilities

Communication systems located throughout the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers.

Landline telephone service in the Project area is provided by various commercial communications companies. The majority of the landline facilities are located in county or city-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles and underground.

In addition to landline service, a large number of communications towers have been constructed throughout the area for cellular telephone service. Cellular towers have been erected along major travel corridors to meet emergency service objectives. Cellular service is available, to varying degrees, throughout the area.

4.14.4.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to electric power, natural gas, or telecommunications facilities if it would:

- **INF-1** Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[18]

16 California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 96.

17 California Gas and Electric Utilities, 2020 California Gas Report.

18 Refer to Section 4.14.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR for a discussion of water infrastructure; Section 4.14.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR for a discussion of wastewater infrastructure; and Section 4.8, *Hydrology and Water Quality*, of this Draft EIR for a discussion of storm water infrastructure. Also refer to the Initial Study provided in Appendix A of this Draft EIR for a discussion of telecommunication systems.

Methodology

The analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with available capacity. Project energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2020.4.0. During construction, energy would be consumed in the form of electricity associated with conveyance of water, lighting, and other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Operational energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances. Additional details regarding Project energy usage are provided in Section 4.4, *Energy*, and Appendix E of this Draft EIR.

For consistency with the emissions modeling provided in Section 4.2, *Air Quality*, Section 4.4, *Energy*, and Section 4.6, *Greenhouse Gas Emissions*, the Project's energy use was calculated assuming buildout would occur in 2026. This analysis assumes that the Project would comply with the same Title 24 Building Energy Efficiency Standards (currently the 2019 version). While the Title 24 standards are typically revised every 3 years with more stringent energy efficiency requirements, it is not known to what extent future revisions to the Title 24 standards would reduce the Project's energy demand. Therefore, it is not possible to accurately quantify the effects of future revisions to the Title 24 standards on the Project's energy demand.

The Project's estimated energy demands were analyzed relative to existing and planned energy supplies of SCE, LADWP, and SoCalGas in 2026 (i.e., the first full Project buildout year) to determine if these energy utility companies would be able to meet the Project's energy demands.

The Project's need for expanded telecommunication services was analyzed relative the existing site and surrounding area's existing infrastructure related to cellular and landline phone service and internet service.

Project Design Features

No specific project design features are proposed with regard to electric power and natural gas facilities. However, the Project includes project design features to improve energy efficiency, as set forth in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Analysis of Project Impacts

Threshold INF-1: Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Analysis

Electric Power

Construction

Construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. Heavy construction equipment

would be powered with diesel fuel. Construction electricity usage would be offset by the reduction in the existing electricity usage at the Project Site from the removal of the existing buildings. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. As discussed Section 4.4, *Energy*, electricity demand during project construction would be approximately 1.11 percent of the Project's net annual operational electricity consumption, of which would be within the supply and infrastructure capabilities of SCE and LADWP.[19] Therefore, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

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

Therefore, construction of the Project is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

As reported in Table 4.4-4, *Summary of Annual Energy Use During Project Operation – Project*, in Section 4.4, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity usage would be approximately 10,921,690 kWh for the Project. Of the total, Building 1, which is located in Culver City and served by SCE, would use 3,291,467kWh annually and Building 2, which is located in Los Angeles and served by LADWP, would use 7,630,223 kWh annually. The Project-related increase in annual electricity consumption of 3,291,467 kWh at Building 1 would represent 0.003 percent of SCE's projected sales in 2026 and the annual electricity consumption of 7,630,223 kWh at Building 2 would represent 0.028 percent of LADWP's project sales in 2026. During peak conditions, the Project would represent 0.003 percent of the SCE estimated peak load and 0.028 percent of the LADWP estimated peak load.

The CEC estimates energy forecasts for SCE using socioeconomic and environmental indicators including geographical and climatic factors, population growth, employments rates, transportation electrification, advances in efficiency and conservation, and demand response programs.[20]LADWP generates its load forecast to account for regional economic and population growth based on multiple forms of data from various agencies, including historical sales from the General

[19] The percentage is derived by taking the annual average amount of electricity usage during the construction period (13,993 kWh) and dividing that number by the annual amount of net electricity usage during operation (12,137,615 kWh) to arrive at 0.12 percent.

[20] CEC, The California Energy Demand 2018–2030 Revised Forecast, April 19, 2018.

Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account, building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[21] In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would, therefore, account for the Project's electricity demand.[22]

The CEC estimates that SCE would record system sales of approximately 120,000 GWh in 2026.[23] In addition, based on LADWP's collected data in its 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its net energy for load in the 2026–2027 fiscal year (the Project's buildout year) will be 27,428 GWh of electricity.[24,25]

The LADWP 2017 Power Strategic Long-Term Resource Plan and the CEC California Energy Demand 2018–2030 Revised Forecast identify adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction.

Based on the required load forecast projections by SCE and LADWP, these utilities would be expected to meet the Project's demand, and the Project's operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Natural Gas

Construction

Construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support Project construction activities; thus, there would be no expected demand generated by construction.

The Project would involve installation of new natural gas connections to serve Building 2 of the Project Site.[26] Given that the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to grading/trenching activities in order to place

[21] Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, December 31, 2017, p. 70.

[22] Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, December 31, 2017, p. 67.

[23] CEC, The California Energy Demand 2018–2030 Revised Forecast, April 19, 2018, p. 97.

[24] Los Angeles Department of Water and Power defines its future electricity supplies in terms of sales that will be realized at the meter.

[25] Los Angeles Department of Water and Power P, 2017 Final Power Strategic Long-Term Resource Plan, December 31, 2017, p. 14.

[26] Building 1 would utilize all-electric appliances, HVAC, and fixtures and would not consume natural gas.

the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for, or an interruption in the delivery of, natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities. Further, the construction of the Project would reduce the consumption of natural gas at the Project Site during construction activities due to the removal of existing on-site uses.

Therefore, the construction of the Project is not anticipated to adversely affect the natural gas facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

As reported in Table 4.4-4, in Section 4.4, *Energy*, of this Draft EIR, the Project would consume a net increase of approximately 7,330,872 cf of natural gas per year, which represents approximately 0.0008 percent of the 2026 forecasted consumption in the SoCalGas planning area. SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and economic growth, with efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2020 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 1 percent from 2020 to 2035. The decline in throughput demand is due to modest economic growth, and CPUC-mandated energy efficiency standards and programs and SB 350 Goals. Other factors that contribute to the downward trend are tighter standards created by the revised Title 24 Codes and Standards, renewable electricity goals, a decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)." Based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the CPUC at the time contractual arrangements are made. Based on the required load forecast projections by SoCalGas, the utility would be expected to meet the Project's demand and natural gas services, and the Project's operation would not significantly affect the available natural gas supply or distribution infrastructure and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Telecommunication

As discussed in the Initial Study (Appendix A of this Draft EIR), 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. 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, less-than-significant impacts would occur, and no further analysis is warranted.

Mitigation Measures

Impacts regarding electric power or natural gas facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding electric power or natural gas facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Impact Analysis

Cumulative impacts occur when the incremental effects of a project are significant when combined with similar impacts from other related projects in a similar geographic area. As presented in Chapter 3, *Environmental Setting*, of this Draft EIR, Table 3-1, the City has identified 52 related projects located within the vicinity of the Project Site. Of the 52 related projects, 34 are located within the City of Culver City and 18 are located within the City of Los Angeles. The geographic context for the analysis of cumulative impacts on electricity is SCE's and LADWP's service areas, and the geographic context for the analysis of cumulative impacts on natural gas is SoCalGas' service area, because the Project and related projects are located within the service boundaries of SCE, LADWP, and SoCalGas.

Electric Power

Construction

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

Therefore, construction of the Project and related projects is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant cumulative environmental effects.

Operation

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SCE and LADWP. As described in CEC's California Energy Demand 2018–2030 Revised Forecast and LADWP's 2017 Power Strategic Long-Term Resource Plan, SCE and LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with SCE's and LADWP's

environmental priorities and reliability standards. The 2017 Power Strategic Long-Term Resource Plan and California Energy Demand 2018–2030 Revised Forecast take into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. In addition, LADWP considers projected Los Angeles County building permit amounts when determining its load forecast and would therefore account for the Project's and the related project's electricity demand within its projections. Development projects within the SCE and LADWP service areas would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Thus, SCE and LADWP consider growth from related projects within their service areas for the need for energy infrastructure, such as new or expanded energy facilities.

Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters for each related project confirming availability of adequate electricity supplies as part of the total load growth of the regional power system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project Site area. Related projects would also be required to evaluate electricity demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would be required to obtain evidence of service from SCE and LADWP, or the appropriate utility provider, to ensure that electric service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and cumulative impacts would be less than significant.

Natural Gas

Construction

As stated above, construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support related projects or Project construction activities; thus, there would be no expected cumulative demand generated by construction.

Operation

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas, as needed. Development projects within SoCalGas' service area, including the Project and related projects, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects. In addition, SoCalGas would provide service letters for each related project confirming availability of adequate natural gas

supplies as part of the total load growth of the regional natural gas system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area. Related projects would also be required to evaluate natural gas demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding electric power or natural gas facilities were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts regarding electric power or natural gas facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

CHAPTER 5
Alternatives

5.1 Introduction

Under the California Environmental Quality Act (CEQA), and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of Project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability of the alternative to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

The project alternatives selected for analysis in an EIR, must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).*

CEQA Guidelines Section 15626.6(e) requires the analysis of a "no project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible.[3] Based on the alternatives analysis, an environmentally superior alternative is to be designated. In

1 CEQA Guidelines Section 15126.6(b).
2 CEQA Guidelines Section 15126.6(f).
3 CEQA Guidelines Sections 15126.6(e), 15126.6(f)(1).

general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.[4]

CEQA Guidelines Section 15126.6(d) states that the EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. It further states that, if an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the alternatives analysis need not discuss those effects in the same level of detail as the significant effects of the project are discussed.

5.2 Objectives of the Project

Chapter 2, *Project Description*, of this Draft EIR, sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to provide a creative office campus for innovative entertainment, media, and/or technology companies. The Project's specific objectives are as follows:

- Develop an integrated Project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.
- Support City of Culver City, City of Los Angeles, and regional goals and policies to reduce vehicle miles traveled and associated greenhouse gas (GHG) and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.
- Provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy.
- Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.
- Provide an amount parking that satisfies anticipated demand from the Project but does not undercut transit usage.
- Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.
- Provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site.
- Support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.

[4] CEQA Guidelines Section 15126.6(e)(2).

5.3 Overview of Alternatives Selected for Analysis

As stated above, the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a proposed project. Based on the analysis in Chapter 4, *Environmental Impacts Analysis*, of this Draft EIR, implementation of the Project would result in significant construction impacts that cannot be feasibly mitigated to a less-than-significant level with regard to (1) Project-level and cumulative regional air quality impacts during construction; (2) Project-level and cumulative on-site construction noise; (3) cumulative off-site construction noise (construction vehicles); and (4) Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles). The Project would not result in any significant operational impacts. The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Zoning-Compliant Alternative
- Alternative 3: Reduced Project Alternative
- Alternative 4: Alternate Project Access Alternative

Alternative 1 is a No Project/No Build Alternative pursuant to CEQA Guidelines Section 15126.6(e). Under the No Project/No Build Alternative, the Project would not be developed and existing on-site uses would remain as under the existing conditions.

In addition to the No Project/No Build Alternative, three development alternatives are included for analysis in this Draft EIR. Two alternatives (Alternatives 2 and 3) would limit the amount of development and density that would reduce the total square footage (sf) of the proposed buildings as compared to the Project. Another alternative (Alternative 4) would consist of an equivalent building scenario as compared to the Project but would include the installation of a traffic signal along Venice Boulevard at the Project driveway located on Venice Boulevard. The four alternatives, including the No Project/No Build Alternative, are listed below and described in more detail in this chapter. The alternatives considered for evaluation are compared to the Project, as summarized in **Table 5-1**, *Overview of the Project Alternatives*.

TABLE 5-1
OVERVIEW OF THE PROJECT ALTERNATIVES

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Office Uses in Building 1 (Culver City Parcel)	167,000 sf	0 sf	122,842 sf	125,250 sf	167,000 sf
Office Uses in Building 2 (Los Angeles Parcel)	369,000 sf	0 sf	369,000 sf	276,750 sf	369,000 sf
Total Building sf	536,000 sf	0 sf	491,842 sf	402,000 sf	536,000 sf
Maximum Building 1 Height	Max. 56 feet	Same as existing	Max. 43 feet	Max. 56 feet	Max. 56 feet
Maximum Building 2 Height	Max. 75 feet	Same as existing	Max. 75 feet	Max. 56 feet	Max. 75 feet
Publicly Accessible Amenity Area	7,120 sf	0 sf	7,120 sf	7,120 sf	7,120 sf
Excavation Depth	50 feet bgs	N/A	50 feet bgs	50 feet bgs	50 feet bgs
Parking Spaces	1,216 spaces	0 spaces	1,095 spaces	911 spaces	1,216 spaces

bgs = below ground surface

SOURCE: ESA, 2022.

5.4 Alternatives Considered and Rejected

CEQA Guidelines Section 15126.6(c) describes that an EIR should identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected from detailed consideration are discussed below.

5.4.1 Alternative Off-Site Location

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then an alternative location should be considered and analyzed in the EIR. Per CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR." If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. According to CEQA Guidelines Sections 15126.6(f)(1) and (f)(2), among the factors that may be considered when addressing the feasibility of an alternative site are general suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. The above is in light of the fact that, per CEQA Section 15126.6(a), "An EIR shall describe a

range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."

The Project's significant and unavoidable impacts, including construction-related Project-level and cumulative air quality emissions (as it relates to regional NO_X emissions), Project-level and cumulative on-site construction noise, off-site construction noise (construction vehicles), and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicle) impacts would be expected to occur if the Project were developed at other available locations in the area as the emissions and noise generation would be similar to the Project and would impact potential nearby sensitive receptors similarly. Therefore, moving the location of the Project to another site would not necessarily reduce the nature and extent of such impacts. Accordingly, given the nature of the Project's significant unavoidable impacts, evaluation of an alternate location was not pursued as it would be likely to shift these impacts to another location rather than helping to avoid or substantially lessen the significant effects of the Project.

In addition to considering whether an alternative site would avoid or substantially lessen impacts, various factors may be considered when addressing the feasibility of an alternative site. Factors considered may include general suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.[5]

The Project Site is located within a High Quality Transit Area (HQTA) and Transit Priority Area (TPA), and in close proximity to multiple transit options, including the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line Culver City Station, which is suitable for a high-density office project compared to a location that is not within a HQTA and TPA. An off-site location may would likely not meet a key Project Objective to support City and regional goals and policies to reduce VMT and associated GHG and regional pollutant emissions by increasing employee density in close proximity to transit, including the "E" Line and numerous bus routes, to the same extent as the Project. While certain off-site locations may be in close proximity some transit options, the Project Site is directly across from the Metro "E" Line Culver City Station and as such, it is an ideal location for a high-density office project seeking to support City and regional goals and policies to reduce operational vehicle miles traveled (VMT) and associated GHG and regional pollutant emissions. Available building sites of a size to accommodate the scale and density of the Project within the HQTA and TPA are scarce.

In addition, the Applicant does not have ownership or control of any other suitable site with similar transit options, or the foreseeable ability to acquire an alternative site within a reasonable timeframe in the local project vicinity. Therefore, the flexibility to develop a similar project on the same or similar scale at another location in proximity to similar public transit is not feasible.

For the reasons stated above, an off-site location alternative is not expected to meaningfully reduce the significant and unavoidable impacts of the Project, would likely not meet a key Project objective

5 CEQA Guidelines Sections 15126.6(f)(1) and 15126.6(f)(2).

to reduce VMT and GHG emissions, and a feasible alternate location for the Project has not been identified. Accordingly, an off-site alternative has not been carried forward for further analysis.

5.4.2 Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction

As discussed in Section 4.10*, Noise*, of this Draft EIR, the Project would result in significant and unavoidable impacts related to Project-level and cumulative on-site construction noise impacts, cumulative off-site construction noise (construction vehicles) impacts, and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles). No additional mitigation measures are available to reduce these impacts to a less than significant level.

Alternatives, including those that would reduce construction duration or Project scale/intensity, were considered to substantially reduce or avoid these significant and unavoidable impacts. Based on the thresholds upon which the construction noise and vibration analysis is based, a substantial reduction in the intensity of the peak construction activities would be necessary to reduce construction-related impacts to a less-than-significant level. In addition, significant construction noise and vibration impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities are inherently disturbing, and the peak construction activity would be similar. Thus, reducing temporary construction noise and vibration impacts below a level of significance at adjacent uses would not be feasible while still achieving the Project's objectives. Furthermore, any reduction in the intensity of construction activities would increase the overall duration of the construction period. Therefore, alternatives to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible based on the inability to avoid significant environmental impacts under a reasonable construction schedule.

5.4.3 Reduced Concrete Pour Alternative

As discussed in Section 4.2, *Air Quality*, Project construction activities would result in significant and unavoidable construction-related air quality impacts when construction activities overlap with operational activities. Also, as discussed in Section 4.10, *Noise*, of this Draft EIR, the Project would result in short-term significant and unavoidable cumulative construction-related noise impacts. A large contributor to these impacts is the concrete trucks needed for building foundations. To construct portions of a building foundation, concrete must be continuously poured in a strategic manner over a short period of time considering its drying time and need to properly cure without cracking and provide proper building support. Breaking up the concrete pours for specific sections over multiple days in a given area is not a feasible option to properly construct a building foundation, as such breaks in the concrete pours would not provide a stable foundation built to applicable building code and regulatory requirements. Thus, reducing or eliminating the number of concrete trucks in a given construction phase is not a feasible alternative to reduce the Project's significant and unavoidable Project-level and cumulative construction-related regional air quality impacts when construction activities overlap with operational activities and significant and unavoidable cumulative construction-related noise impacts.

5.4.4 Residential/Mixed-Use Alternative

An alternative with residential uses only or a mixed-use alternative with some residential uses was considered for development on the Project Site. However, developing the Project Site solely with residential uses or a mixed-use residential project would not meet the underlying purpose of the Project to provide a creative office campus for innovative entertainment, media, and/or technology companies. Furthermore, a residential use or a mixed-use residential project would not meet most of the Project's basic objectives or would meet them to a lesser extent as the Project such as those focused on: supporting City and regional goals and policies to reduce VMT and associated GHG and regional pollutant emissions by increasing employee density in proximity to transit, including the "E" Line and numerous bus routes; providing high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies; strengthening the area's economic vitality by attracting and retaining highly skilled workers; and generating additional revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs. Additionally, a residential-only or mixed-use residential alternative would, similar to the Project, result in construction-related significant and unavoidable impacts associated with construction air quality and noise. Accordingly, a residential only or mixed-use residential alternative has not been carried forward for further analysis.

5.5 Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), three feasible alternatives to the Project are evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Chapter 2, *Project Description*, of this Draft EIR would be substantially attained by the alternative. The evaluation of each of the alternatives follows the format described below:

- A description of the alternative.
- The environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operational phase.
- Environmental impacts of the alternative and the Project are compared for each environmental issue area evaluated in Chapter 4, *Environmental Impacts Analysis*, the Draft EIR. Where the impact of the alternative would be less adverse than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would be more adverse than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project, an impact would be entirely avoided, whether a significant impact under the Project could be reduced to a less-than-significant level in the alternative, or whether a significant unavoidable impact under the alternative would be feasible to be mitigated to a less-than-significant level.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives would be attained by the alternative.

At the end of the section, a comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an Environmentally Superior Alternative is identified. The comparative impacts of the Project and the alternatives are summarized in Table 5-2 below.

5.5.1 Alternative 1: No Project/No Build Alternative

Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, Alternative 1 means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. As mentioned in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently improved with single-story warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. On the Culver City Parcel, the approximately 9,739 sf building is currently used for storage and the 9,082 sf building is currently vacant. On the Los Angeles Parcel, the approximately 86,226 sf warehouse building has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. Under this alternative, the occupied areas on the Project Site would continue to operate as under existing conditions. In addition, as it can be reasonably assumed that the vacant 9,082 sf building could be occupied in the future, under this alternative this building is assumed to be re-occupied by office uses, which was the use of the building prior to becoming vacant. The 9,739-sf building on the Culver City Parcel would continue to be occupied by storage uses.

Environmental Impacts

Aesthetics

Senate Bill (SB) 743 (codified in PRC Section 21099(d)(1)) and Zoning Information (ZI) File No. 2452 provide that an employment center project in a designated urban TPA site is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. The Project is considered an employment center project[6] and is located on an infill site within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption of significant impact findings under SB 743. As such, no findings of significance are provided in Section 4.1, Aesthetics, of this Draft EIR. Nonetheless, the Project is compared to Alternative 1 herein only for information disclosure purposes.

[6] Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area" The Culver City portion of the Site is zoned Industrial General (IG) and is within the East Washington Overlay (-EW), both of which allow commercial office uses. The portion of the Site located in the City of Los Angeles is zoned C2-2D-CPIO and is within the areas of the West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay (CPIO) and the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production, and neither the CPIO nor the Expo TNP restrict such uses.

Substantial Adverse Effect on a Scenic Vista

Under Alternative 1, no new buildings would be constructed, and no changes would occur with respect to existing conditions on the Project Site. Accordingly, because Alternative 1 would not result in any changes to the Project Site, no effects on scenic vistas would occur. As such, effects under Alternative 1 would be less than the Project.

Substantially Damage a Scenic Resource

Alternative 1 would not change any conditions on the Project Site and would have no effect on scenic resources, such as the Helms Bakery Complex, located adjacent to and east of the Project Site. Accordingly, because Alternative 1 would not result in any changes to the Project Site, no effects on scenic resources would occur. As such, effects under Alternative 1 would be less than the Project.

Applicable Zoning and Other Regulations Governing Scenic Quality

No development would occur under Alternative 1 and, as such, no conflict with regulations that govern scenic quality would occur. Accordingly, because Alternative 1 would not change any conditions at the Project Site, no effects would occur. As such, effects under Alternative 1 would be less than the Project.

Substantial Light or Glare

Under Alternative 1, light sources on the Project Site would continue to consist of building security and architectural lighting, surface parking lot lights, illuminated signage, and interior building lighting from the existing building on the Project Site. Accordingly, because Alternative 1 would not introduce new sources of light and glare, no effects with respect to light and glare would occur. As such, effects under Alternative 1 would be less than the Project.

Air Quality

Conflict with Air Quality Management Plan

While Alternative 1 would not involve any new construction, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. Since new development would not occur, Alternative 1 would not generate new construction emissions, and while the currently vacant building on the Culver City Parcel would be re-occupied with office uses, emissions from the office uses are anticipated to be nominal. As such, Alternative 1 would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the objectives of the Air Quality Management Plan (AQMP). Accordingly, because Alternative 1 would not result in any significant emissions generation, air quality impacts would be less than significant. Impacts with regard to conflicts with AQMPs would be less under Alternative 1 than the Project as emissions from the re-occupied building would be less than those of the Project.

Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

Alternative 1 would not involve construction or generate any new criteria pollutants related to construction. Accordingly, because Alternative 1 would not result in any new emissions generation, no air quality impacts would occur. As such, Alternative 1 would avoid the Project's potential exceedance of daily NO_X emissions above the applicable threshold during construction, which even with mitigation would result in a significant and unavoidable impact during concurrent operation

of Building 1 and the construction of Building 2. Thus, impacts with regard to air quality thresholds during construction would be less under Alternative 1 than the Project.

Operation

As Alternative 1 would re-occupy the 9,082-sf building on the Culver City Parcel with office uses, new emissions would be generated over existing conditions. However, given the small size and use of the re-occupied building, emissions are anticipated to be nominal, would be below the significance thresholds, and would result in a less-than-significant impact. Thus, impacts with regard to air quality thresholds during operation would be less under Alternative 1 than the Project as emissions from the re-occupied building would be less than those of the Project.

Exposure of Sensitive Receptors to Pollutant Concentrations

Localized Emissions

Alternative 1 would not involve any construction at the Project Site. Accordingly, Alternative 1 would not generate any localized emissions and is considered to have no impact related to localized emissions during construction. However, Alternative 1 would re-occupy the 9,082-sf building on the Culver City Parcel with office uses, which would nominally increase localized emissions through consumer product sources and energy sources. Given the small size and use of the re-occupied building, Alternative 1 is not anticipated to generate localized emissions that would result in an exceedance of the significance thresholds. Impacts related to localized emissions during operation would be less than significant. Thus, impacts with respect to localized emissions under Alternative 1 would be less than the Project.

Carbon Monoxide Hotspots

As Alternative 1 would re-occupy the 9,082-sf building on the Culver City Parcel with office uses, traffic would be increased at the Project Site compared to existing conditions. While Alternative 1 would generate emissions that would contribute to carbon monoxide (CO) hotspots, given the small size and use of the re-occupied building, it is not anticipated to generate emissions that would cause a CO hotspot. As such, Alternative 1 would result in less-than-significant impacts. Impacts with respect to CO hotspots under Alternative 1 would be less than the Project.

Toxic Air Contaminants

Construction

Alternative 1 would not involve any construction or new development at the Project Site compared to existing conditions. Accordingly, Alternative 1 would not generate any toxic air contaminant (TAC) emissions during construction and is considered to have no impact related to TAC emissions. Thus, impacts with regard to TAC emissions during construction would be less under Alternative 1 than the Project.

Operation

As Alternative 1 would re-occupy the 9,082-sf building on the Culver City Parcel with office uses, new emissions would be generated over existing conditions. While Alternative 1 would generate TAC emissions during operation, given the small size and use of the re-occupied building, TAC emissions are anticipated to be nominal and would result in a less-than-significant impact related to TAC emissions. Thus, impacts with regard to TAC emissions during operation would be less

under Alternative 1 than the Project as emissions from the re-occupied building would be less than those of the Project.

Cultural Resources

Historical Resources

Alternative 1 would not involve any construction on the Project Site. Therefore, it would not directly or indirectly affect existing historical resources impacted by the Project, including the adjacent Helms Bakery Building within the Helms Bakery Complex. Alternative 1 would have no impact to historical resources. Thus, impacts with regard to historical resources would be less under Alternative 1 than the Project.

Archaeological Resources

Alternative 1 would not require any excavation activities that would potentially encounter previously undiscovered archaeological resources. Accordingly, because Alternative 1 would involve no excavation or ground disturbance, it would have no impact on archaeological resources. As such, Alternative 1 would avoid the Project's less-than-significant impacts (after mitigation) related to an adverse change in the significance of an archaeological resource. Thus, impacts related to archaeological resources would be less under Alternative 1 than the Project.

Energy

Efficient Energy Consumption

While Alternative 1 would not involve any new construction, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses that would generate an increase in demand for energy compared to existing conditions. However, given the small size and use of the re-occupied building, energy use of the office building is anticipated to be nominal. As such, Alternative 1 would have a less-than-significant impact regarding efficient energy consumption. Impacts with regard to efficient energy consumption would be less under the Alternative 1 than the Project. However, it is noted that the existing buildings on the Project Site would not be as energy efficient as the proposed buildings under the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As no new construction is proposed under Alternative 1 and given the nominal energy use under this alternative, Alternative 1 would not conflict with plans for renewable energy and energy efficiency. Impacts regarding conflicting with such plans would be less than significant. Thus, impacts with respect to conflicts with plans for renewable energy or energy efficiency would be less under Alternative 1 than the Project. However, it is noted that the existing buildings on the Project Site would not be as energy efficient as the proposed buildings under the Project.

Geology and Soils

Seismic Hazards

Alternative 1 would not involve any new development or earthwork at the Project Site or exacerbate existing geological l conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Accordingly, because Alternative 1 would not involve any new development or earthwork, it would not change the existing exposure to geologic conditions and

no impacts would occur. Thus, impacts related to seismic hazards would be less under Alternative 1 than the Project.

Soil Erosion or Loss of Topsoil

Alternative 1 would not require any new construction activity or exposure of soils due to construction. Accordingly, because Alternative 1 would not involve any construction activity or earthwork, it would not cause the potential exposure of soil or loss of topsoil, and no impacts would occur. Thus, impacts related to soil erosion or loss of topsoil would be less under Alternative 1 than the Project.

Unstable Geologic Unit

Alternative 1 would not include any new development that could expose more people or structures to unstable geologic units, such as localized raveling or caving of excavated areas. Accordingly, because Alternative 1 would not involve any new structures or excavation activity, it would not expose people or structures to unstable geologic units, and no impacts would occur. Thus, impacts related to unstable geologic units would be less under Alternative 1 than the Project.

Expansive Soils

Alternative 1 would not include any new development that could expose more people or structures to geologic hazards, such as expansive soils. Accordingly, because Alternative 1 would not involve any new structures on the Project Site, it would not expose people or structures to geologic hazards, such as expansive soils, and no impacts would occur. Thus, impacts related to expansive soils would be less under Alternative 1 than the Project.

Paleontological Resources

Alternative 1 would not require any construction activities; therefore, it would have no potential to encounter previously undiscovered paleontological resources. Accordingly, because Alternative 1 would involve no excavation or ground disturbance, it would have no impact on paleontological resources. Thus, impacts related to paleontological resources would be less under Alternative 1 than the Project.

Greenhouse Gas Emissions

While Alternative 1 would not include construction of any new buildings, the vacant 9,082 sf building is assumed to be re-occupied with office uses, which would result in an increase in new GHG emissions. However, given the small size and use of the re-occupied building, Alternative 1 would generate nominal GHG emissions over existing conditions. As such, impacts related to GHG emissions under Alternative 1 would be less than significant. Alternative 1 would also result in less-than-significant impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHG emissions would be less under Alternative 1 than the Project.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials/Accidental Release of Hazardous Materials into the Environment

Alternative 1 includes the re-occupation of the vacant 9,082 sf building with office uses, which would result in a nominal increase in the use and storage of small quantities of chemicals typical in

office uses, such as cleaning solutions, paints, and thinners. However, no construction is required under this alternative. Given the nominal increase in use of hazardous materials, Alternative 1 would result in less-than-significant impacts regarding potential hazards to the public or the environment through the routine use, transport, or disposal of hazardous materials or accidental release of hazards materials into the environment. Impacts related to hazardous materials and accidental release would be less under Alternative 1 than the Project as the hazardous materials generated by the re-occupied building would be less than those of the Project.

Emitting Hazards within One-Quarter Mile of a School

Alternative 1 includes the re-occupation of the vacant 9,082 sf building with office uses. Office uses would not include the transport or disposal of significant amounts of hazardous materials. Types of hazardous materials to be used in association with the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. No construction is required under this alternative. As such, while Alternative 1 would use small quantities of potentially hazardous materials typical of maintenance or operational uses within one-quarter mile of an existing or proposed school, all materials would be stored, handled, and disposed of in accordance with applicable laws and regulations. As such, impacts would be less than significant. Impacts related to the release of hazardous materials near a school would be less under Alternative 1 than the Project as the hazardous materials generated by the re-occupied building would be less than those of the Project.

Hazards Materials Database

Alternative 1 would not involve construction or alter existing activities on a site included on a list hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 1 would have no impact with regard to development occurring on a site included on a list of hazardous materials sites. Thus, impacts related to development on a site included on a list of hazardous materials sites would be less under Alternative 1 than the Project.

Adopted Emergency Response Plan

While Alternative 1 would not require any new construction activities, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, additional vehicle trips generated under Alternative 1 would be less than the Project. Vehicles trips generated by the Project would only nominally affect the implementation of emergency response or evacuation plans such that a less than significant impact would occur. Alternative 1, with less traffic, would reduce the Project's less-than-significant impact related to emergency response and evacuation plans. Thus, impacts related to emergency response and evacuation plans would be less under Alternative 1 than the Project.

Hydrology and Water Quality

Violate Water Quality Standards

Construction

Alternative 1 would not involve any construction and, as such, would not cause surface or groundwater exposure to pollutants during construction that would violate water quality or waste

discharge standards. Accordingly, because Alternative 1 would not involve any construction, it would have no impact on surface or groundwater quality. As such, it would avoid the Project's less-than-significant impact related to water quality standards during construction (with mitigation). Thus, impacts related to water quality during construction would be less under the Alternative 1 than the Project.

Operation

The existing Project Site was developed prior to the enforcement of storm water quality best management practice (BMP) design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. Unlike the Project, Alternative 1 would not include water treatment features and BMPs in accordance with current regulations that improve the quality of stormwater runoff. As such, because these beneficial improvements would not occur under Alternative 1, impacts related to water quality during operation would be greater under Alternative 1 than the Project's less-than-significant impacts, but still less than significant.

Decrease Groundwater Supplies or Recharge

Alternative 1 would result in no physical changes to the Project Site and, as such, would have no impact on groundwater supplies or recharge. Accordingly, because Alternative 1 would not involve any construction, it would have no impact on groundwater supplies or recharge. As such, it would avoid the Project's less-than-significant impact related to dewatering during construction and percolation and infiltration during operation. Thus, impacts related to groundwater supplies or recharge would be less under Alternative 1 than the Project.

Substantially Alter Existing Drainage Pattern

Construction

Alternative 1 would not involve any construction and, as such, would not alter existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increased rate or flow in surface runoff; or the exceedance of the capacity of the area's drainage system. Accordingly, Alternative 1 would have no impact with respect to drainage patterns, siltation, erosion, and surface runoff. Thus, impacts related to siltation, erosion, surface runoff, and redirection of flood flows during construction would be less under Alternative 1 than the Project.

Operation

Alternative 1 would not change the Project Site's existing surface runoff conditions, which generally consist of impervious surface parking, buildings, and pavement for pedestrian and vehicular circulation. Accordingly, because Alternative 1 would not involve any construction, it would have no impact related to siltation, erosion, surface runoff, and redirection of flood flows. However, unlike the Project, beneficial impacts related to improving the quality of stormwater runoff as a result of the implementation of water treatment features and BMPs in accordance with current regulations would not occur under Alternative 1. As such, because these beneficial improvements would not occur under Alternative 1, impacts related to siltation, erosion, surface runoff, and redirection of flood flows during operation would be greater under Alternative 1 than the Project's less-than-significant impacts.

Water Quality Control Plan

Alternative 1 would not cause any changes in existing physical conditions or result in any new development of the Project Site. Accordingly, this alternative would have no bearing on the implementation of water quality control plans, the policies of which are expressed in local and State water quality regulations for the protection of water resources. Thus, impacts related to water quality control plans or sustainable groundwater management plans would be less under Alternative 1 than the Project.

New or Expanded Stormwater Drainage Facilities

Alternative 1 would not change the volume of runoff discharged from the Project Site to the municipal storm drain system through added or reduced imperviousness on the Project Site; therefore, stormwater infrastructure needs would not change compared to existing conditions on the Project Site. Accordingly, because the imperviousness on the Project Site would not change under Alternative 1, it would have no impact relative to stormwater infrastructure. Thus, impacts with regard to stormwater infrastructure would be less under Alternative 1 than the Project's less than significant impact.

Land Use and Planning

Alternative 1 would not change the existing land use. The existing parking lots, commercial uses, and zoning designations would remain. As no physical changes would occur on the Project Site, Alternative 1 would not conflict with any adopted plans, policies or regulations related to avoiding or reducing environmental impacts. Although Alternative 1 would not further regional and local policies applicable to the Project Site with the City of Culver City or the City of Los Angeles, such as enhancing pedestrian activity or increasing transit use, this alternative would have no impacts with respect to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less under Alternative 1 than the Project.

Noise

Noise Levels in Excess of Standards

Construction

Alternative 1 would not involve any construction activities, and, therefore, no construction noise impacts would occur. As such, Alternative 1 would avoid the Project's significant and unavoidable Project-level and cumulative on-site construction noise and cumulative off-site construction noise (construction vehicles) impacts at nearby noise-sensitive receptor locations during Project construction. Thus, impacts related to construction noise would be less under Alternative 1 than the Project.

Operation

Occupancy and activity at the Project Site would increase slightly under Alternative 1 with the re-occupancy of the vacant on-site building. However, given the small size and use of the re-occupied building, the increase in operational noise level would be minimal. Impacts would be less than significant. Impacts related to operational noise would be less under Alternative 1 than the Project.

Groundborne Vibration

Construction

Alternative 1 would not involve any new development or construction, and, therefore, no construction vibration impacts would occur. As such, Alternative 1 would avoid the Project's significant and unavoidable Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles) impacts to nearby vibration sensitive receptor locations. Thus, impacts related to construction vibration would be less under Alternative 1 than the Project.

Operation

Occupancy and activity at the Project Site would increase slightly under Alternative 1 with the re-occupancy of the vacant on-site building. However, given the small size and use of the re-occupied building, it is not anticipated that Alternative 1 would generate perceivable operational vibration and impacts would be less than significant. Impacts related to operational noise would be less under Alternative 1 than the Project.

Public Services

Fire Protection

While Alternative 1 would not require any new construction activities, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. While the on-site population would increase slightly under Alternative 1, given the small size and use of the re-occupied building, it is not anticipated that this alternative would materially increase demand or otherwise affect fire protection services or necessitate the need for new or expanded fire facilities. Accordingly, impacts would be less than significant under this alternative. Overall occupancy of the Project Site would be less under Alternative 1 than the Project. Impacts related to fire protection services would be less under Alternative 1 than the Project.

Police Protection

While Alternative 1 would not require any new construction activities, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. While the on-site service population would increase slightly under Alternative 1, given the small size and use of the re-occupied building, it is not anticipated that this alternative would materially increase demand or otherwise affect police protection services and necessitate the need for new or expanded police facilities. Accordingly, impacts would be less than significant under this alternative. Overall occupancy of the Project Site would be less under Alternative 1 than the Project. Thus, impacts related to police protection services would be less under Alternative 1 than the Project.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

While Alternative 1 would include the re-occupancy of the vacant building that would incrementally increase the trips generated by this alternative, Alternative 1 would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of the Culver City General Plan Circulation Element, City of Culver City Short Range Mobility Plan, City of Culver City Bicycle and Pedestrian Action Plan, Culver City Complete Street Policy, Los Angeles Municipal Code, Los

Angeles Mobility Plan 2035, Los Angeles West Adams-Baldwin Hills-Leimert Community Plan, Los Angeles Department of Transportation (LADOT) Vision Zero, Los Angeles Citywide Design Guidelines, and Los Angeles Plan for a Healthy Los Angeles. Accordingly, Alternative 1 would neither implement nor conflict with any such programs, plans, ordinances, or policies, and, as such, no impact would occur. Thus, impacts related to potential conflicts with any such programs, plans, ordinances, or policies would be less under Alternative 1 than the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

While Alternative 1 would include the re-occupancy of the vacant building that would incrementally increase the trips generated by this alternative, given the small size and use of the re-occupied building, the increase in VMT over existing conditions would be nominal and would not trigger screening thresholds that would require a VMT analysis. Accordingly, Alternative 1 would have a less than significant impact with respect to consistency with CEQA Guidelines Section 15064.3(b). Thus, impacts related to VMT would be less under Alternative 1 than the Project.

Design Hazards

Alternative 1 would not involve any new development and, thus, would not include new sidewalks, driveways, or roadway improvements in and around the Project Site. Therefore, no design hazards impacts would occur under Alternative 1. Thus, impacts related to emergency access would be less under Alternative 1 than the Project.

Emergency Access

While Alternative 1 would not require any new construction activities, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, the re-occupied building would generate only a nominal amount of additional vehicle trips, and overall trips under Alternative 1 would be less than the Project. As such, the additional vehicle trips generated by Alternative 1 would not result in inadequate emergency access and impacts would be less than significant. Impacts related to emergency access would be less under Alternative 1 than the Project.

Tribal Cultural Resources

Alternative 1 would not require any construction activities; therefore, it would have no potential to encounter tribal cultural resources. Accordingly, because the Alternative 1 would involve no excavation or ground disturbance or change in use of the Project Site, it would have no impact related to tribal cultural resources. Thus, impacts related to tribal cultural resources would be less under Alternative 1 than the Project.

Utilities and Service Systems

Water Supply

While Alternative 1 would not construct new buildings, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, the alternative's water demand would only nominally increase compared to existing conditions on the Project Site. Accordingly, impacts related to water supply or infrastructure would be less than significant. Impacts with regard to water supply and infrastructure would be less under Alternative 1 than the Project.

Wastewater

While Alternative 1 would not construct new buildings, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, the alternative's wastewater generation would only nominally increase compared to existing conditions on the Project Site. Accordingly, Alternative 1 would generate a nominal increase in wastewater demand on the existing Hyperion Water Reclamation Plant (HWRP) or Hyperion Service Area. As such, impacts on the wastewater service system would be less than significant. Impacts with regard to wastewater would be less under Alternative 1 than the Project.

Solid Waste

While Alternative 1 would not construct new buildings, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, the alternative's solid waste generation would only nominally increase compared to existing conditions on the Project Site. Accordingly, Alternative 1 would have a less than significant impacts relative to solid waste. Impacts with regard to solid waste would be less under Alternative 1 than the Project.

Electric Power, Natural Gas, Telecommunications Facilities

While Alternative 1 would not construct new buildings, under this alternative, the vacant 9,082 sf building is assumed to be re-occupied with office uses. However, given the small size and use of the re-occupied building, the electric power and natural gas infrastructure needs required under this alternative would only nominally increase compared to existing conditions on the Project Site. Accordingly, impacts relative to electric power and natural gas infrastructure would be less than significant. Thus, impacts with regard to electric power and natural gas infrastructure would be less under Alternative 1 than the Project.

Relationship of the Alternative to Project Objectives

As described above, Alternative 1 assumes that no new development would occur on the Project Site. The on-site uses on the Los Angeles Parcel would continue to operate similar to existing conditions and the vacant 9,082 sf building on the Culver City Parcel would be re-occupied with office uses. While Alternative 1 would include the occupancy of the vacant building on the Project Site, Alternative 1 does not propose redevelopment of the Project Site and would not meet most of the Project objectives. However, some objectives would be met but to a lesser extent than the Project, as follows:

- Support City of Culver City, City of Los Angeles, and regional goals and polices to reduce vehicle miles traveled and associated greenhouse gas and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.
- Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.

5.5.2 Alternative 2: Zoning-Compliant Alternative

Description of the Alternative

With development under the Zoning-Compliant Alternative (Alternative 2), the Project Site would be developed in accordance with the existing Industrial General (IG) and East Washington Overlay (-EW) Zone on the Culver City Parcel and C2-2D-CPIO (Commercial, Height District 2, Community Plan Implementation Overlay) zone, CPIO, and Expo TNP on the Los Angeles Parcel. The IG and -EW Zone both allow for office uses, including creative office and multimedia production. 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 "D" Development Limitation that requires compliance with the West Adams-Baldwin Hills-Leimert CPIO, which includes regulations on permitted uses, floor area, height, setbacks, parking, and landscape. Similar to the Project, this alternative would include creative office uses.

Alternative 2 would develop a total of 491,842 sf of office uses on the Project Site compared to the Project's proposed 536,000 sf of office uses, for an 8 percent reduction in total building sf. To comply with the 43-foot height limit of the existing zoning, Building 1 on the Culver City Parcel would feature a three-story building instead of the four-story building contemplated under the Project. The reduced building would include 122,842 sf of office, 44,158 sf less than the 167,000 sf in Building 1 under the Project. Other than the reduced height and square footage, the setbacks and general massing of Building 1 would remain the same under Alternative 2. Building 2 on the Los Angeles Parcel would feature the same total building area, number of stories, and maximum height as under the Project: 369,000 sf of office, configured in a five-story building, with a maximum building height of 75 feet. Alternative 2 would include a similar publicly accessible amenity area as the Project. However, the massing of Building 2 would be materially different than under the Project to strictly comply with the existing zoning. Unlike the Venice Boulevard frontage under the Project, which features an uninterrupted façade with a deeply recessed entryway, the Venice Boulevard frontage in Alternative 2 would be set back a maximum of two feet from the property line, and the street-facing façade would feature a 20-foot passageway effectively dividing Building 2 into two separate buildings, each with approximately 240 feet of frontage on Venice Boulevard. The Venice Boulevard frontage would also be built to a maximum height of 55 feet, rather than the 56 feet proposed in the Project. The National Boulevard frontage of Building 2 would observe a 15-foot dedication. The Venice Boulevard and National Boulevard building facades would be massed vertically from these setbacks, unlike the varied massing proposed under the Project. Levels three and four would be massed to observe the 5-foot step back from the Helms Building that applies above 30 feet. To recapture the lost building area resulting from the 20-foot passageway along Venice Boulevard, each level of Building 2 would increase in overall depth toward the central courtyard. However, Building 2 would provide the required open space under the CPIO. To be consistent with the tower massing requirements under the CPIO, the fifth level would be reduced to a significantly smaller floorplate and would be located toward the center of the Los Angeles parcel, away from Venice Boulevard. Finally, to comply with the mid-block Paseo requirements of the Expo TNP, a publicly accessible pedestrian connection would be provided along portion of Building 2 adjacent to the Helms alley.

While the number of vehicle parking spaces provided would be reduced from 1,216 spaces under the Project to 1,095 spaces under Alternative 2, this alternative would still require a three-level subterranean garage under both the Building 1 and Building 2 and would require a maximum excavation depth of 50 feet, similar to the Project. However, the footprint of the subterranean parking garages would be reduced, which would in turn would reduce the amount of required soil excavation. Proposed circulation and loading dock locations would be similar under the Project and Alternative 2.

As with the Project, Alternative 2 would require the demolition of the existing buildings and associated paved surface parking areas on the Project Site. Although only an 8 percent reduction in sf is proposed under Alternative 2, given the reduced density and sf, the overall duration and intensity of construction under Alternative 2 would be incrementally less than that of the Project.

Environmental Impacts

Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that an employment center project in a designated urban TPA site is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. The Project is considered an employment center project[7] and is located on an infill site within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption of significant impact findings under SB 743. As such, no findings of significance are provided in Section 4.1, *Aesthetics*, of this Draft EIR. Nonetheless, the Project is compared to Alternative 2 herein only for information disclosure purposes.

Substantial Adverse Effect on a Scenic Vista

Similar to the Project, Alternative 2 would introduce above grade structures that would affect existing direct views across the Project Site during construction and operation. While Alternative 2 would include the construction of two total creative office buildings on the Culver City Parcel and the Los Angeles Parcel, Building 1 under Alternative 2 would be 13 feet shorter in height as compared to the Project. As with the Project, construction of Alternative 2 would affect views by the use of cranes, buildings under construction, construction fencing, and the new buildings themselves. As with the Project, Alternative 2 would implement similar project design features as the Project that would ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (e.g., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period. In addition, as the buildings proposed under Alternative 2 and the Project would not block existing primary views

[7] Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area" The Culver City portion of the Site is zoned Industrial General (IG) and is within the East Washington Overlay (-EW), both of which allow commercial office uses. The portion of the Site located in the City of Los Angeles is zoned C2-2D-CPIO and is within the areas of the West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay (CPIO) and the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production, and neither the CPIO nor the Expo TNP restrict such uses.

from the Helms Bakery Building or Complex as the west façade of the Helms Bakery Building is already obstructed by existing development. Under both the Project and Alternative 2, the removal of the existing 8771 Washington building on the Project Site under Alternative 2 would open up new views on the portion of the Helms Bakery Building's west elevation that includes windows and decorative details, thereby increasing the visibility of the Helms Bakery Building along Washington Boulevard. In the absence of existing scenic views across the Project Site, neither the Project or Alternative 2 would block or have an adverse effect on a scenic vista. Thus, despite the difference in height of Building 1, the effects on scenic vistas under Alternative 2 would be similar to the Project.

Substantially Damage a Scenic Resource

Similar to the Project, Alternative 2 would be built within a highly urbanized area not located near any natural scenic resources or within proximity to a scenic highway. Alternative 2 would remove the street trees in proximity of the site, and as with the Project, Alternative 2 would comply with the City of Culver City and City of Los Angeles street tree replacement requirements. With regard to historic resources, Alternative 2 would be located in proximity to the Helms Bakery Building and Helms Bakery Complex. While the building setbacks would be shallower under this alternative than under the Project, the primary facades of the Helms Bakery Building along Venice and Washington Boulevards, including all of its signage and landscape features, would be visible following development of Alternative 2, albeit to a lesser extent than the Project. As with the Project, Alternative 2 would have not have a substantial adverse effect on a historical resource within the Project Site or the setting of the Helms Bakery Building or Helms Bakery Complex. Overall, Alternative 2 would not have a substantial adverse effect on a scenic resource. When compared to the Project, the effects on scenic resources under Alternative 2 would be similar.

Applicable Zoning and Other Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. Alternative 2 would be developed in accordance with the IG and -EW Zone on the Culver City Parcel and C2-2D-CPIO zone, the CPIO, and Expo TNP on the Los Angeles Parcel. Alternative 2 and the Project would include similar creative office uses within two buildings. In addition, similar to the Project, Alternative 2 would implement project design features that would require mechanical, electrical, and roof top equipment (including heating, ventilation, and air conditioning (HVAC) systems), as well as building appurtenances, to be integrated into the architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way. As the buildings proposed under Alternative 2 would be largely similar to that of the Project and given that Alternative 2 would be developed consistent with the existing zoning on the Project Site, development under Alternative 2 would not conflict with zoning and other regulations governing scenic quality for the City of Culver City and City of Los Angeles. When compared to the Project, impacts related to conflicting with regulations that govern scenic quality under Alternative 2 would be similar to the Project.

Substantial Light or Glare

As with the Project, Alternative 2 would introduce news sources of short-term lighting during the construction phase and new sources of lighting during the operation of this alternative. Similar to the Project, Alternative 2 would implement project design features that would require construction and operational lighting to be shielded and directed downward (or on the specific on-site feature to be lit) to avoid undue glare or light trespass onto adjacent or nearby uses. In addition, all lighting would be consistent with City of Culver City and City of Los Angeles requirements. Glare sources under Alternative 2 would be similar to that of the Project and would also be regulated by City of Culver City and City of Los Angeles code requirements. Alternative 2 would also implement similar project design features that would require glass used in building façades to be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Furthermore, as it relates to shading shadow-sensitive uses, given that Building 2 under this alternative would be the same height as Building 2 under the Project, Alternative 2 could result in similar limited shading to residential uses. As Building 1 would be shorter under Alternative 1 as compared to the Project, the effects of shading shadow-sensitive uses would be less. Based on the above, Alternative 2 would not adversely affect day or nighttime views. When compared to the Project, effects related to light and glare under Alternative 2 would be similar to the Project.

Air Quality

Conflict with Air Quality Management Plan

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 2 would be consistent with the goals of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the City of Culver City General Plan and Mandatory Green Building Program, and the Air Quality Element of the City of Los Angeles General Plan that support and encourage reducing single occupancy vehicle trips and VMT. For all of these reasons, impacts under Alternative 2 with respect to consistency with AQMPs would be less than significant. When compared to the Project, impacts related to conflicting with the AQMP under Alternative 2 would be similar to the Project.

Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

As with the Project, Alternative 2's construction phases have the potential to generate daily emissions that would exceed the South Coast Quality Management District (SCAQMD) air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of

diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; truck idling restrictions; maintenance of construction equipment; and discontinued use of construction activities during an Air Quality Index (AQI) of 151 or more (unhealthy level), construction emissions under Alternative 2 would not exceed SCAQMD numerical construction significance thresholds, with the exception of concurrent operation of Building 1 and the construction of Building 2. During this overlapping scenario, while accounting for implementation of Mitigation Measure AQ-MM-1, NO_X, emissions would exceed the SCAQMD thresholds of significance for NO_X, which conservatively are SCAQMD's operational significance thresholds. Daily operational thresholds of significance are lower than daily construction significance thresholds. Therefore, the Project's and Alternative 2's temporary impact related to overlapping operational and construction regional NO_X emissions would be significant and unavoidable.

However, Alternative 2 would reduce the scale of development by approximately 8 percent compared to the Project and, thus, would slightly reduce overall construction duration. As Alternative 2 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Operation

During operation, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Also, mobile sources emissions under Alternative 2 would be reduced compared to the Project due to the reduction in traffic trips from the smaller overall size of Alternative 2. Similar to the Project, operational emissions under Alternative 2 would not exceed SCAQMD numerical significance thresholds for VOC, NO_X, CO, SO_X, PM10, and PM2.5, and emissions related to air quality standards would be less than significant. Overall, as Alternative 2 would be developed at a lower intensity and have less traffic than the Project, Alternative 2 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Exposure of Sensitive Receptors to Pollutant Concentrations

Localized Emissions

As with the Project, Alternative 2 would generate construction activity and traffic, and increase localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project, as Alternative 2 would use the same amount and types of construction equipment on a daily basis. As with the Project, maximum localized construction and operational emissions at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5. Therefore, similar to the Project, with respect to localized construction and operation emissions, impacts to sensitive receptors would be less than significant under Alternative 2. Alternative 2 would slightly reduce the scale of the Project, the duration of construction, and building sf compared to the Project. The reduction in construction would reduce the duration of localized emissions during construction. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 2 would reduce daily operational localized emissions from less building energy demand, consumer product usage, and architectural coatings

usage. Accordingly, impacts under Alternative 2 with respect to localized emissions would be less than the Project.

Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 2 than the Project. As such, as with the Project, Alternative 2 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 2 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

Toxic Air Contaminants

Construction

Under Alternative 2, as with the Project, temporary TAC emissions associated with diesel particulate matter (DPM) emissions from heavy construction equipment would occur during construction activities. The Project Site is not located within 500 feet of a freeway, 1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future employees and visitors to the Project Site. Alternative 2 would comply with the California Air Resources Board (CARB) Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction. In addition, Alternative 2 would be required to implement Mitigation Measure AQ-MM-1, which would have co-benefits of reducing emissions of PM10 and PM2.5, which are correlated to DPM emissions, from heavy-duty diesel construction equipment. As with the Project, Alternative 2 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. As Alternative 2 would reduce the duration of construction activities, impacts under Alternative 2 would be less than the Project.

Operation

Alternative 2 includes similar uses as the Project, which proposes the development of creative office uses. Alternative 2 would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Furthermore, trucks during operation of Alternative 2 would be required to comply with the applicable provisions of 13 California Code of Regulations (CCR), Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NO_X emissions from existing diesel trucks. Therefore, as with the Project, operation of Alternative 2 would not be considered a substantial source of DPM. With respect to the use of consumer products and architectural coatings, the office uses associated with Alternative 2 would be expected to generate minimal TAC emissions from these sources. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the proposed uses , operation of Alternative 2 would not expose sensitive receptors to substantial TAC concentrations and operational impacts would be less than significant, as with the Project. However, because of Alternative 2's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 2 would be less than the Project.

Cultural Resources

Historical Resources

As described in Section 4.3, *Cultural Resources*, of this Draft EIR, no historical resources are located on the Project Site. As such, the demolition of the existing buildings in order to construct the Project or Alternative 2 would not cause a substantial adverse change in the significance of a historical resource, as there are no historical resources on the Project Site as defined in CEQA Guidelines Section 15064.5. As it relates to indirect impacts to historical resources, the Project and Alternative 2 would construct proposed buildings in proximity to the Helms Bakery Building, which is a historic building within the Helms Bakery Complex. The buildings constructed under Alternative 2 would feature shallower setbacks along Venice and National Boulevards as compared to the Project. Nonetheless, , the overall massing of buildings and the Helms Bakery Building would be reasonably compatible and the spatial relationship between the buildings would remain similar to existing conditions. In addition, the proposed buildings under the Project or Alternative 2 would serve to increase visibility of the Helms Bakery Building and detract only minimally from the prominence of the Helms Bakery Complex within the built environment due to the demolition of the existing building at 8771 Washing Boulevard and the provision of a publicly accessible and privately maintained open space area in its place. Furthermore, as discussed below, Alternative 2, as with the Project, would not generate groundborne vibration in excess of the structural damage thresholds for the Helms Bakery Building. Additionally for the four other historical resources in the vicinity of the Project Site, any potential views through the Project Site of these historical resources under the Project or Alternative 2 would be obscured due to the presence of other existing intervening buildings, trees, and streets in the dense urban environment. Therefore, similar to the Project, Alternative 2 would not cause a substantial adverse change in the significance of an off-site historical resource. When compared to the Project, impacts related to historical resources under Alternative 2 would be similar to the Project.

Archaeological Resources

Similar to the Project, excavation associated with Alternative 2 would reach a maximum depth of 50 feet. The northern portion of the Project Site is assigned a low sensitivity for historic-period archaeological resource since no known previous uses existed in this area; however, the potential for historic-period archaeological resources in the southern portion of the Project Site is considered moderate to high. Also, the potential to encounter prehistoric archaeological resources is moderate across the entire Project Site; therefore, impacts to previously unknown buried historic and prehistoric archaeological resources are considered potentially significant. Alternative 2, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3. With the implementation of these measures, Alternative 2, as with the Project, would provide for appropriate treatment and/or preservation of archaeological resources if encountered. Under Alternative 2, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. When compared to the Project, impacts related to archaeological resources under Alternative 2 would be similar to the Project.

Energy

Efficient Energy Consumption

Similar to the Project, during construction of Alternative 2, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of the Project and Alternative 2 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Construction of the Project and Alternative 2 would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. Alternative 2 would have reduced sf as compared to the Project. As such, the overall length and intensity of construction would be incrementally less than that of the Project. A shorter construction length would mean less overall electricity and transportation energy usage during construction under Alternative 2 than the Project.

During operation of the Project and Alternative 2, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste. As with the Project, Alternative 2 would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1, which requires achieving LEED Gold equivalent. Specifically, the Project and Alternative 2 would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; electric vehicle (EV) charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. Similar to the Project, Alternative 2 would also concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. Furthermore, the Project and Alternative 2 would provide code-required bicycle parking spaces as well as EV charging stations. These measures would minimize operational transportation fuel demand consistent with State, regional, and City goals.

Section 4.4, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With its reduction in floor area of approximately 8 percent compared to the Project, Alternative 2 would generate a slightly lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption would be less than significant under Alternative 2 and because the scale of development would be less, impacts with respect to efficient energy consumption would be less than the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 2 is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project and Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and California Green Building Standards (CALGreen) Building Code, which have been incorporated into Culver City's Green Building Program and Los Angeles' Green Building Code. In addition, Alternative 2, as with the Project, would be designed to achieve LEED Gold equivalent including energy performance optimization features, including, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. With respect to operational transportation-related fuel usage, the Project and Alternative 2 would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Similar to the Project, Alternative 2 includes the implementation of a transportation demand management (TDM) Program that would encourage efficient transportation and reduce VMT.

Based on the above, similar to the Project, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. When compared to the Project, impacts related to conflicting with plans for renewable energy or energy efficiency under Alternative 2 would be similar to the Project.

Geology and Soils

Seismic Hazards

No known active or potentially active faults bisect the Project Site, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone. The closest known active fault to the Project Site is the Newport-Inglewood Fault located approximately 0.21 miles to the east. In addition, similar to the Project, Alternative 2 building foundation and structural design and construction would be subject to the requirements of the seismic safety provisions of the California Building Code (CBC) (Title 14, CCR, Part 2), which have been formulated to prevent building collapse during a design earthquake so that building occupants can evacuate buildings after an earthquake. Furthermore, with regard to liquefaction, compliance with existing regulations would substantially reduce the potential liquefaction hazard at the Project Site. Therefore, through compliance with applicable regulations and the recommendations in the detailed final geotechnical investigation, impacts related to seismic hazards would be less than significant under Alternative 2. When compared to the Project, impacts related to seismic hazards under Alternative 2 would be similar to the Project.

Soil Erosion or Loss of Topsoil

The Project Site has no topsoil; therefore, the Project or Alternative 2 would not cause the loss of topsoil. As the Project Site is larger than one acre, the construction activities at the Project Site under the Project or Alternative 2 would be required to obtain coverage under and comply with the

Construction General Permit. As with the Project, Alternative 2 would be required to prepare and implement a Stormwater Pollution Prevention Plans (SWPPP) that would include various BMPs to control runon and runoff from the construction site. Therefore, through compliance with applicable regulations, impacts related to erosion under Alternative 2 would be less than significant similar to the Project. When compared to the Project, impacts related to soil erosion and loss of topsoil under Alternative 2 would be similar to the Project.

Unstable Geologic Unit

Excavation under Alternative 2, as with the Project, would cause disturbance of existing soils and could contribute to potential liquefaction and lateral spreading, subsidence, or collapse. Compliance with CBC Sections 1803 (Detailed Geotechnical Investigations), 1304 (Excavations, Grading and Fill), and J104.3 (Grading Permit Requirements – Geotechnical/Soils Report) would substantially reduce the potential for geologic stability issues by requiring construction, grading compaction, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions. The potential for subsidence at the Project Site is considered low. The CBC, which Culver City and the City of Los Angeles have adopted by reference, outlines foundation, footing and other design requirements to withstand the effects of normal levels of subsidence, and requires that detailed geotechnical studies be prepared for proposed development projects prior to building permit approval that outline design requirements specific to the proposed development site. Furthermore, with regard to collapse, grading activities under both the Project and Alternative 2 would occur in accordance with the requirements of the CBC, including with CBC Section 1304 and CBC Section J104.3, which would ensure the proper regrading and compaction is conducted, and would avoid the potential for collapse. Therefore, through compliance with applicable regulations, impacts related to unstable geologic unit under the Project and Alternative 2 would be less than significant. When compared to the Project, impacts related to seismic hazards under Alternative 2 would be similar to the Project.

Expansive Soils

The geotechnical investigation for the Project concluded that the Project Site soils would be capable of supporting the Project's proposed structures with recommended foundation design measures. Because Alterative 2 would include similar excavation and structures as the Project, the same findings in the geotechnical investigation apply to Alternative 2. In addition, compliance with CBC Sections 1803, 1304, and J104.3 under the Project and Alternative 2 would substantially reduce the potential for expansive soils impacts by requiring construction, over-excavation and compaction of problematic soils, moisture management, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions including expansive soils. Therefore, through compliance with applicable regulations, impacts related to unstable geologic unit under the Project and Alternative 2 would be less than significant. Impacts related to expansive soils under Alternative 2 would be similar to the Project.

Paleontological Resources

Excavation associated with Alternative 2 would reach a maximum depth of 50 feet, same as the Project. As discussed in Section 4.5, *Geology and Soils*, of this Draft EIR, Geologic mapping indicates that the surface of the Project Site is underlain by Holocene-age alluvium (Qa), which

have a low sensitivity for paleontological resources due to the young age of the deposits and are unlikely to preserve fossil resources. However, these sediments increase in age with depth, such that the deeper layers of this unit have a higher potential to preserve paleontological resources. In addition, the paleontological records search conducted through the Natural History Museum of Los Angeles County (NHMLAC) also indicates that older (Pleistocene-age) geologic units in the vicinity of the Project Site have produced paleontological resources. Given the identification of numerous fossil specimens at depth during construction projects in the immediate vicinity, the positive results of NHMLAC records search, and since excavations for the Project and Alternative 2 would extend to depths of about 50 feet below ground surface (bgs), the potential to encounter buried paleontological resources during construction is considered high. Similar to the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1, GEO-MM-2, and GEO-MM-3. With the implementation of these measures, impacts under the Project and Alternative 2 related to paleontological resources during Project construction would be reduced to a less-than-significant level. When compared to the Project, impacts related to paleontological resources under Alternative 2 would be similar to the Project.

Greenhouse Gas Emissions

Like the Project, construction and operation activities under Alternative 2 would increase GHG emissions. The smaller scale and lower mobile emissions associated with Alternative 2 would generate lower daily maximum GHG emissions than the Project. As with the Project, Alternative 2 would incorporate applicable project design features, including Project Design Feature GHG-PDF-1, which requires achieving LEED Gold equivalent, and Project Design Feature TRAF-PDF-1, which would include implementation of a TDM Program. GHG emission impacts under Alternative 2, as with the Project, would be less than significant.

Alternative 2, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, Culver City's Green Building Program and City of Los Angeles Green Building Code, L.A.'s Green New Deal (Sustainability pLAn 2019), and the City's Green Building Code. As such, similar to the Project, impacts under Alternative 2 related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant. Impacts related to GHG emissions would be similar to the Project.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials/Accidental Release of Hazardous Materials into the Environment

Construction

Construction of Alternative 2, as with the Project, would include demolition of existing buildings and parking areas. Existing on-site buildings may have asbestos-containing materials (ACM), lead-based paint (LBP), and/or polychlorinated biphenyls (PCBs) in some building materials. Remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences would reduce impacts to less than significant. Similar to the Project, Alternative 2 would also include the excavation of soil to construct three levels of underground parking under each building. However, the soils underlying the Project Site were found to contain presence of perchloroethene (PCE) in soil vapor, which has the potential to

exceed environmental screening levels, although it is unlikely to exceed the multiple orders of magnitude higher Federal Occupational Safety and Health Administrations (OSHA) construction worker respiratory standards. In addition, benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above their respective maximum contaminant levels (MCLs). Based on the presence of PCE in soil vapor and other pollutants in the groundwater, Alternative 2 would implement mitigation similar to the Project, including Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would include the implementation of a health and safety plan and implementation of soil and groundwater management plan. Impacts after implementation of mitigation would be less than significant under both the Project and Alternative 2.

Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions under both the Project and Alternative 2. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. The management of hazardous materials in accordance with all applicable regulations and standards during construction would reduce impacts to less than significant under both the Project and Alternative 2. When compared to the Project, impacts related to routine transport, use, or disposal of hazardous materials during construction of Alternative 2 would be similar to the Project.

Operation

As with the Project, operation of Alternative 2 would use and store small quantities of chemicals typical in office uses, such as cleaning solutions, paints, and thinners. Potentially, a few of the chemicals would be considered hazardous materials (e.g., bleach) and the anticipated volumes would be small (i.e., less than 5 gallons). Given that the quantities would be small, the routine use or an accidental spill of hazardous materials would render this impact less than significant under both the Project and Alternative 2. In addition, due to the contamination of groundwater underlying the Project Site, the installation of a groundwater barrier for the proposed parking garages under both the Project and Alternative 2 would serve to prevent intrusion of vapors from the groundwater surface into the indoor air of the structures and reduce the impact to less than significant. When compared to the Project, impacts related to routine transport, use, or disposal of hazardous materials during operation of Alternative 2 would be similar to the Project.

Emitting Hazards within One-Quarter Mile of a School

As with the Project, demolition and excavation activities at the Project Site under Alternative 2 would include the transportation and off-site disposal of hazardous waste. Construction of the Project and Alternative 2 would involve the temporary use of hazardous substances in the form of paints and thinners, glues and adhesives, solvents cleaning agents, and fuels and oils, which are all commonly used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. In addition, there are two schools within 0.25 miles of the Project Site. The nearest freeway to the Project Site is the Santa Monica Freeway (I-10), which is located north of the Project Site. The Project's Construction

Management Plan (Project Design Feature TRAF-PDF-1) would ensure construction-related vehicles are routed away from schools. Accordingly, with implementation of Project Design Feature TRAF-PDF-1, and through compliance with applicable regulations, construction-related impacts associated with handling of hazardous materials within 0.25 miles of a school would be less than significant under the Project and Alternative 2.

Once constructed, operation of the Project or Alternative 2 would not include the transport or disposal of significant amounts of hazardous materials. The proposed office uses would not cause hazardous substance emissions or generate significant quantities of hazardous waste. Types of hazardous materials to be used in association with the Project or Alternative 2, such as small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, while the Project and Alternative 2 would emit small quantities of potentially hazardous materials typical of maintenance or operational uses within 0.25 miles of an existing or proposed school, all materials would be disposed of in accordance with applicable laws and regulations, and impacts would be less than significant.

When compared to the Project, impacts related to emitting hazards within 0.25 miles of a school under Alternative 2 would be similar to the Project.

Hazards Materials Database

Based on the review of regulatory databases provided in the Phase I Environmental Site Assessment (ESA), the Project Site was listed for one and possibly two past asbestos removal projects, and for the storage of small quantities of hazardous materials by a past tenant. None of the listings reported releases, spills, or violations. The use of hazardous materials and the disposal of hazardous materials waste was conducted in accordance with federal, State, and local regulations. Therefore, while the Project Site is listed on hazardous materials lists, the listings do not include releases, spills, or violations. Under the Project or Alternative 2, in the event that additional ACM and/or LBP is discovered during demolition, impacts would be less than significant through remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences.

Thus, impacts related to development on a hazardous materials site under Alternative 2 would be similar to the Project.

Adopted Emergency Response Plan

Similar to the Project, construction activities under Alternative 2 would not require full street closures, and most construction activities would be confined to the Project Site. All streets that front the Project Site have at least two lanes in both directions, and only the one lane closest to the Project Site may require temporary closures. Therefore, at least one travel lane in each direction would be open at all times. In addition, similar to the Project, Alternative 2 would implement Project Design Feature TRAF-PDF-1, which would include planning for and the management of construction traffic into and out of the Project Site. Because of the relatively short-term nature of the construction activities and with implementation of a Construction Management Plan,

construction activities under the Project and Alternative 2 would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Once operational, the Project and Alternative 2 would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. Therefore, impacts regarding an adopted emergency response plan or emergency evacuation plan would be less than significant under the Project and Alternative 2. When compared to the Project, impacts related to an adopted emergency response plan under Alternative 2 would be similar to the Project.

Hydrology and Water Quality

Violate Water Quality Standards

Construction

As with the Project, construction of Alternative 2 could result in sediment and other pollutants being transported off-site by stormwater runoff, potentially degrading the water quality in off-site drainages and surface water bodies such as Ballona Creek. Because the overall footprint of construction activities would exceed one acre, the Project and Alternative 2 would be required to comply with the *NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit) and the local stormwater ordinances. The Construction General Permit requires preparation and implementation of a SWPPP, which requires applications of BMPs to control runon and runoff from construction work sites. The construction of the underground parking garages under the Project and Alternative 2 would require excavation to about 50 feet bgs, which would be to a level below the shallowest observed depth to groundwater of 28.8 feet bgs. Consequently, the excavation would require dewatering to facilitate construction of the parking garages and foundations for the buildings. As with the Project, Alternative 2 would be required to comply with applicable NPDES permitting requirements and the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge requirements (WDRs) for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties. With compliance with existing regulations, impacts associated with the discharge of dewatering effluent during construction of the Project and Alternative 2 would be less than significant. In addition, due to the presence of PCE in soil vapor and other pollutants in the groundwater, excavation activities during construction of the project and Alternative 2 could encounter contaminated soils or groundwater, which if not properly handled or disposed of, could potentially result in adverse impacts to surface or groundwater quality. As such, similar to the Project, Alternative 2 would implement Mitigation Measure HAZ-MM-2, which requires the preparation and implementation of a soil and groundwater management plan prior to and during construction. This mitigation measure would reduce impacts related to hazardous materials, as well as potentially significant impacts to surface or groundwater quality to a less-than-significant level. When compared to the Project, impacts related to violating water quality standards during construction of Alternative 2 would be similar to the Project.

Operation

Similar to the Project, Alternative 2 could generate pollutants of concern within stormwater runoff that can flow directly into storm drains and continue untreated. As with the Project, Alternative 2 would implement BMPs, including a capture and reuse system to comply with the Low Impact Development (LID) standards, including capture and treatment of the 85th percentile storm event volume or 0.75-inch storm event. Since there are currently no existing on-site BMPs, stormwater runoff during post-development conditions under the Project and Alternative 2 would result in improved surface water quality. Due to the incorporation of the required LID BMPs, operation of the Project or Alternative 2 would not result in discharges that violate any water quality standards or waste discharge requirements; rather, they would improve water quality compared to existing conditions. Therefore, impacts resulting from operation of the Project or Alternative 2 would be less than significant with respect to surface water quality and groundwater quality. When compared to the Project, impacts related to violating water quality standards during operation of Alternative 2 would be similar.

Decrease Groundwater Supplies or Recharge

Construction

As with the Project, groundwater is anticipated to be encountered during construction of Alternative 2 and temporary dewatering is likely to be required, which could affect groundwater supplies. To facilitate excavation to depths below groundwater, dewatering may be necessary. Temporary pumps and filtration would be used in compliance with all applicable regulations and requirements, including NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties, or any other appropriate WDR permits identified by the LARWQCB, and local regulations. As the groundwater table would be allowed to stabilize and recharge during construction after the basement levels can withstand hydrostatic forces, dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Based on the above, the construction of the Project or Alternative 2 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management of the basin, and impacts would be less than significant. When compared to the Project, impacts related to decreasing groundwater supplies or recharge during construction of Alternative 2 would be similar.

Operation

Similar to the Project, Alternative 2 would include two underground parking garages that would extend to 50 feet bgs, which would be below the shallowest observed depth to groundwater of 28.8 feet bgs. Under the Project or Alternative 2, the design of the underground floors and slabs would withstand hydrostatic pressure. With proper design of the underground parking garages, permanent dewatering would not be required and would not impact groundwater supplies. In addition, the Project and Alternative 2 would not include injection or supply wells, do not include the installation or operation of water wells or any extraction or recharge system, and would not affect groundwater supplies. Based on the analysis above, the operation of the Project or Alternative 2 would not significantly decrease groundwater supplies or interfere with groundwater recharge such that they could impede sustainable groundwater management of the basin, and

impacts would be less than significant. When compared to the Project, impacts related to decreasing groundwater supplies or recharge during operation of Alternative 2 would be similar.

Substantially Alter Existing Drainage Pattern

Construction

Similar to the Project, construction activities under Alternative 2 would alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Changes in the drainage pattern could result in on- or off-site flooding, or exceeding the capacity of existing or planned stormwater drainage systems. Since the construction site would be greater than one acre, the Project and Alternative 2 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project or Alternative 2 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows, prevent pollution, and avoid on- or off-site flooding. BMPs would ensure that runoff is within the capacity of existing or planned stormwater drainage systems and would prevent any water from off-site sources from freely flowing into or across the Project Site. No other construction activities would require an increase in the use of water that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under construction of Alternative 2, as with the Project, would be less than significant. When compared to the Project, construction-related impacts related substantially altering existing drainage patterns under Alternative 2 would be similar to the Project.

Operation

Alternative 2, as with the Project, would comply with LID requirements to ensure that stormwater treatment with operational BMPs would control pollutants associated with storm events up to the 85th percentile storm event. Drainage patterns for the Project Site would be changed because runoff would no longer be entirely discharged to the municipal storm drain system, as it is now. As part of the City of Culver City and City of Los Angeles requirements to manage post-construction stormwater runoff, the Project and Alternative 2 would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site to collect roof and site runoff and direct stormwater through a series of underground storm drainpipes to the underground cisterns for later use as landscaping water. Similar to the Project, implementation of the proposed LID BMPs under Alternative 2 for both cities and compliance with Culver City SUSMP requirements would reduce the volume of stormwater runoff discharged from the Project Site and prevent on- or off-site erosion of siltation. The reduction in the volume of stormwater runoff would also reduce the volume of flow to stormwater drainage systems and no new off-site storm drainage infrastructure would be needed based on the on-site improvements. Given that similar buildings and landscaping is proposed under Alternative 2 and the Project, similar drainage conditions would occur, which would result in a decrease in impervious areas and an increase in volume of storm water infiltrated on-site. Therefore, neither Project nor Alternative 2 would alter the course of a stream or river or increase the amount of impervious surfaces, in a manner which

would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Furthermore, neither the Project nor Alternative 2 would change the direction of flow or impede any floodwater from off-site sources. With implementation of LID BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under operation of Alternative 2, as with the Project, would be less than significant. When compared to the Project, impacts related to substantially altering existing drainage patterns during operation of Alternative 2 would be similar to the Project.

Water Quality Control Plan

Alternative 2, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in applicable local and State water quality regulations for the protection of water resources. Alternative 2, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES stormwater permitting program. In compliance with the LID requirements, the Project and Alternative 2 would install a capture and reuse system. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with LID requirements. As with the Project, impacts related to water quality control plans under Alternative 2 would be less than significant. When compared to the Project, impacts related to consistency with water quality control plans under Alternative 2 would be similar.

New or Expanded Stormwater Drainage Facilities

Similar to the Project, surface runoff on the Project Site under Alternative 2 would be collected by building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would then convey flows to underground cisterns for later use as landscaping water. As compared to existing conditions, both the Project and Alternative 2 would reduce the existing volume of runoff discharged from the Project Site to the municipal storm drain system during storm events. Consequently, the volume of flow to stormwater drainage systems would be reduced, and no new off-site storm drainage infrastructure would be needed based on the on-site improvements. As such, neither the Project nor Alternative 2 would result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. As with the Project, impacts under Alternative 2 would be less than significant. When compared to the Project, impacts related to new or expanded stormwater drainage facilities under Alternative 2 would be similar.

Land Use and Planning

Alternative 2 proposes the development of 491,842 sf of office use on the Project Site. Specifically, Building 1 on the Culver City Parcel would include 122,842 sf of office use and would have a reduced maximum building height of 43 feet under this alternative compared to the Project. The height and massing of Building 2 on the Los Angeles Parcel would remain unchanged under Alternative 2 and would include 369,000 sf of office use with a maximum building height of 75 feet. Alternative 2 would include a similar publicly accessible amenity area as the Project. The proposed sf and building heights and setbacks would be consistent with the

existing IG and -EW Zone on the Culver City Parcel and C2-2D-CPIO zone, CPIO, and Expo TNP on the Los Angeles Parcel.

As with the Project, the density and location of Alternative 2 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including: SCAG's 2020–2045 RTP/SCS, the Culver City General Plan, the Culver City Bicycle & Pedestrian Action Plan, the Culver City Urban Forest Master Plan, the Culver City Redevelopment Plan for the Culver City Redevelopment Project, the Design for Development (DFD) Exposition Light Rail Transit and Station Area, the Culver City Transit Oriented Development (TOD) Visioning Study and Recommendations, the Culver City Municipal Code, the City of Los Angeles General Plan Framework and Conservation Elements, the West Adams–Baldwin Hills–Leimert Community Plan, and the Los Angeles Municipal Code, CPIO and Expo TNP and, as such, impacts with respect to land use would be less than significant. As no changes in zoning or land use designations would be required under Alternative 2, impacts related to land use and planning would be would be less than the Project.

Noise

Noise Levels in Excess of Standards

Construction

Construction activities under Alternative 2 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 2 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 2 would be the same as the Project. Based on a conservative impact analysis, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise-sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 NOI-MM-2 would be implemented under Alternative 2 to reduce construction noise impacts at off-site noise-sensitive receptors. However, as with the Project, even with implementation of mitigation measures, potentially significant on-site construction noise impacts would remain significant and unavoidable under Alternative 2. With regard to off-site construction noise, the increase in noise levels of construction trips along any of the studied roadway segments would not exceed the significance threshold, and impacts would be less than significant. The overall duration and intensity of construction under Alternative 2 would be less than that of the Project. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 2 would be less than the Project.

In addition, as discussed in Section 4.10, *Noise*, cumulative noise impacts from on-site construction noise and off-site construction noise (construction vehicles)would be significant and unavoidable for the Project. Alternative 2 would also result in similar significant and unavoidable cumulative noise impacts, however, they would occur for a shorter duration under Alternative 2 than under the Project. Thus, cumulative construction-related significant and unavoidable impacts related to construction noise under Alternative 2 would be less than the Project.

Operation

Alternative 2, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed mechanical equipment noise, parking structure noise, dock area noise, and open space noise. However, Alternative 2 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 2 than the Project. As the Project would not exceed the significance thresholds for off-site traffic noise, off-site traffic noise impacts under Alternative 2 would also not exceed any significance thresholds, and impacts would be less than significant.

With a decrease in sf of creative office uses compared to the Project, operational noise levels would be incrementally less than the Project. Under Alternative 2, fixed mechanical equipment, including air conditioning equipment and an emergency generator, and loading docks and refuse collection would be located in similar locations as the Project and would include similar enclosures. As with the Project, noise levels from these sources under Alternative 2 would be less significant. In addition, parking under Alternative 2 would be provided in two subterranean parking areas with similar vehicular access to the Project Site as the Project. As with the Project, these parking areas would not result in significant increases in ambient noise levels at the off-site sensitive receptor locations. Impacts from parking facilities under Alternative 2, as with the Project, would be less than significant. Furthermore, as outdoor open spaces would be smaller in size under Alternative 2 as compared to the Project, noise generated by outdoor spaces would be less under Alternative 2. As the noise contribution from outdoor spaces would be minimal and impacts would be less than significant under the Project, outdoor noise generated under Alternative 2 would similarly be less than significant. Overall, composite operational noise levels would be less than significant under both the Project and Alternative 2. However, given the reduced number of employees and vehicle trips under Alternative 2, operational noise impacts would be less under Alternative 2 than the Project.

Groundborne Vibration

Construction

Construction of Alternative 2, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, and haul trucks, etc.). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 2 would be below the structural damage significance criteria at off-site building structures. In addition, as with the Project, the structural damage vibration impacts from off-site construction traffic would also be below the structural damage significance criteria. Regarding off-site vibration, as with the Project, the estimated vibration levels due to off-site construction activities would not exceed the structural damage threshold, but would exceed the human annoyance threshold for residential uses. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage and on-site vibration for human annoyance would be less than significant; however off-site vibration for human annoyance would be significant and unavoidable. As the overall scale of development would be slightly reduced under Alternative 2, the duration of construction and overall construction activity causing vibration would be slightly less, and impacts under Alternative 2 would be less than the Project.

Operation

Day-to-day operations under Alternative 2, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold. Therefore, similar to the Project, operational vibration impacts under Alternative 2 would be less than significant. While Alternative 2 would reduce the overall occupancy of the Project Site, a change in off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 2 compared to the Project, and, as such, impacts under Alternative 2 would be similar to the Project.

Public Services

Fire Protection

Alternative 2, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. As with the Project, Alternative 2 would comply with all regulatory requirements including regulations set forth in the Safety and Health Regulations for Construction established by OSHA and compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. In addition, the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1 to provide a Construction Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The implementation of regulatory requirements and project design features would facilitate emergency access. As such, similar to the Project, construction under Alternative 2 would result in less-than-significant impacts related to fire protection that are similar to the Project's.

During operation, Alternative 2 would result in a lower number of employees on the Project Site as compared to the Project given the smaller building size on the Culver City Parcel proposed under Alternative 2. Alternative 2, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, and other Culver City Municipal Code (CCMC), Los Angeles Municipal Code (LAMC), Culver City Fire Department (CCFD), and Los Angeles Fire Department (LAFD) requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, and manual smoke evacuation systems in the underground parking structure on the Culver City Parcel; installation of Knox Boxes; provision of fire resistant doors, materials, walkways, stairwells, elevator systems (including emergency and fire control elevators), smoke detectors, and signage, among other fire prevention features. Compliance with applicable requirements under both the Project and Alternative 2 would reduce demand on facilities and equipment without creating the need for new or expanded fire facilities. In addition, both buildings under the Project and Alternative 2 would be required to install an automatic fire sprinkler system. As the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response under the Project or Alternative 2 would not be significant. Alternative 2, as with the Project, would also be consistent with CCFD and LAMC fire flow requirements. As such, the Project and Alternative 2 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities,

the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 2, as with the Project, would be less than significant. However, because Alternative 2 would reduce construction duration and Project Site occupancy (employees) compared to the Project, impacts related to fire protection services under Alternative 2 would be less than the Project.

Police Protection

Alternative 2, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 2's construction phase, although of shorter duration than that of the Project, could increase in demand for police protection services. To reduce Culver City Police Department (CCPD) and Los Angeles Police Department (LAPD) demand during construction, Alternative 2, as with the Project, would implement security measures under Project Design Feature POL-PDF-1 to limit access to construction areas and provide for cameras to monitor the Project Site during off hours. Similar to the Project, construction activities under Alternative 2 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 2 would implement Project Design Features TRAF-PDF-1. Under Project Design Features TRAF-PDF-1, a Construction Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Furthermore, it is not anticipated that any additional officers from CCPD or LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses. Therefore, impacts under Alternative 2 would be less-than-significant and similar to the Project.

As with the Project, operation of Alternative 2 would only contribute to increasing the number of non-resident site populations (visitors and employees). As such, the Project or Alternative would not directly generate any new residential population in the City of Culver City or City of Los Angeles. In addition, Alternative 2 would result in a lower number of employees on the Project Site as compared to the Project given the smaller building size on the Culver City Parcel proposed under Alternative 2. Thus, the existing CCPD officer-to-daytime population ratio of approximately 1:2,752 and the LAPD officer-to-population ratio of approximately 1:951 would increase incrementally less under operation of Alternative 2 as compared to the Project. Therefore, while minor staffing changes may be required as a result of the Project or Alternative 2, no new or expanded police facilities would be needed as a result of implementation of Alternative 2, as with the Project. Moreover, as with the Project, demand for police services under Alternative 2 would be reduced with implementation of Project Design Feature POL-PDF-2, which includes the implementation of gated and illuminated parking structure entries, controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV), which would help to offset the Project's operational demand for police protection services. With the implementation of Project Design Feature POL-PDF-2, the Project or Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be

required to maintain service. As such, Alternative 2, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy (employees) under Alternative 2, impacts to police protection services under Alternative 2 would be less than the Project.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Similar to the Project, Alternative 2 would support multimodal transportation options as well as promote transportation-related safety in the vicinity. Alternative 2, as with the Project, would not conflict with policies of the Culver City General Plan Circulation and Element, Culver City Short Range Mobility Plan, Culver City Bicycle and Pedestrian Action Plan, Culver City Complete Streets Policy, Los Angeles Mobility Plan, Los Angeles Plan for a Healthy Los Angeles, Los Angeles Citywide Design Guidelines, Los Angeles Municipal Code, Los Angeles Vision Zero, and the Los Angeles West Adams–Baldwin Hills–Leimert Community Plan. As with the Project, Alternative 2 would implement Project Design Feature TRAF-PDF-2, which would include implementation of a TDM Program that would help to reduce volumes on nearby roadways due to employee commute and encourage transit ridership through various programs. Alternative 2, as with the Project, would not conflict with any of the policies and procedures contained in the above-mentioned City of Culver City and City of Los Angeles transportation-related programs, plans, ordinances, and policies. As such, impacts relative to plans and programs would be less than significant. When compared to the Project, impacts related to conflicting with programs, plans, ordinances, and policies, addressing the circulation system under Alternative 2 would be similar to the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As with the Project, Alternative 2 would be located less than 600 feet from the Metro "E" Line Culver City Station, which qualifies it for VMT screening as specified in the City of Culver City's Transportation Study Criteria and Guidelines (TSCG). Therefore, a VMT analysis is not required for the Project or Alternative 2, and the Project and Alternative 2 would have a less-than-significant impact with respect to VMT. Similar to the Project, Alternative 2 would also implement Project Design Feature TRAF-PDF-2, which includes the implementation of a TDM Program that would consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Both the Project and Alternative 2 would be consistent with CEQA Guidelines Section 15064.3, Subdivision (b), and impacts would be less than significant. However, Because Alternative 2 would generate fewer employees than the Project, it would generate less overall VMT. In consideration of the above, impacts pertaining to consistency with CEQA Guidelines Section 15064.3, Subdivision (b) would be similar under the Project and Alternative 2.

Design Hazards

Alternative 2, as with the Project, would design driveways to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040) and City of Los Angeles Bureau of Engineering Standards (S-440-4). The driveways would be configured to avoid

or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The Project or Alternative 2 would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. With regard to freeway safety, under the Project the projected queue lengths would not exceed the available storage lengths at any of the three studied off-ramps in either the morning or the afternoon peak hours. As Alternative 2 would generate fewer trips to/from the Project Site, projected queue lengths would similarly not exceed the available storage lengths under Alternative 2. Impacts under Alternative 2 would be less than significant and similar to the Project.

Emergency Access

The Project Site is located within an urbanized area with a fully developed roadway system. Similar to the Project, Alternative 2 would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. The Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1, which would require construction staging and construction worker parking to be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. In addition, future driveway and building configurations under the Project and Alternative 2 would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 2 would be less than significant and similar to the Project.

Tribal Cultural Resources

The City complied with Assembly Bill (AB) 52 in its Native American tribal consultation and records searches conducted through South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC). No known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. No known tribal cultural resources, as defined in PRC Sections 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of AB 52 consultation, or as a result of the Sacred Lands File (SLF) search through the NAHC and the SCCIC. However, due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and Ballona Creek, the Project Site's location in the general vicinity of an unnamed village (located approximately 0.3 miles southeast), and given recent discoveries during other construction projects in the vicinity, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, similar to the Project, Alternative 2 would implement Mitigation Measure CUL-MM-2 and Mitigation Measures TCR-MM-1 through TCR-MM-3. With implementation of mitigation measures, impacts under the Project and Alternative 2 would be reduced to less-than-significant

levels. When compared to the Project, impacts related to tribal cultural resources under Alternative 2 would be similar to the Project.

Utilities and Service Systems

Water Supply

New or Expanded Water Facilities

Under Alternative 2, while construction duration would be slightly reduced as compared to the Project, the conservative estimate of construction water use would similarly range from 1,000 to 2,000 gallons per day (gpd) under Alternative 2 as with the Project. The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project or Alternative 2.

Water service for the Project or Alternative 2 would be provided by Golden State Water Company (GSWC) and Los Angeles Department of Water and Power (LADWP), as under existing conditions. When analyzing infrastructure capacity, although domestic water demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. Given the relatively similar size and footprint of the proposed buildings under Alternative 2 as compared to the Project, CCFD and LAFD requirements would be the same for both Alternative 2 and the Project. The existing hydrants in the area of the Project Site would provide adequate fire flow meeting the requirements of CCFD and LAFD. As such, operation of the Project or Alternative 2 would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects and impacts would be less than significant. When compared to the Project, impacts related to new for expanded water facilities under Alternative 2 would be similar to the Project.

Water Supplies

While construction duration would be slightly reduced as compared to the Project, the conservative estimate of construction water use would similarly range from 1,000 to 2,000 gpd under Alternative 2 as with the Project. The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, existing water supplies would be available to meet the temporary water demand associated with construction of the Project.

Similar to the Project, Alternative 2 would require the preparation of a WSA. During operation, Alternative 2 would have reduced sf in comparison to the Project and as such would generate water demand that would be less than the Project's water demand of 85 acre-feet per year (AFY). In addition, Alternative 2 would implement similar project design features as the Project to implement water conservation reductions. Given that the Project's water demand would be within GSWC's and LADWP's 2020 Urban Water Management Plans (UWMPs) projected water supplies for normal, single-dry, and multiple-dry years through the year 2045 and is also within the GSWC and LADWP 2020 UWMP's 25-year water demand growth projections, the same would be true for Alternative 2 given its reduction is size and employees compared to the Project. As such, sufficient water supplies would be available to serve the Project and Alternative 2 and reasonably foreseeable

future development during normal, dry and multiple dry years. Water supply impacts would be less than significant under the Project and Alternative 2. Impacts related to water supply under Alternative 2 would be less than the Project due to the overall reduction in building sf and employees under Alternative 2, which would generate less water demand.

Wastewater

New or Expanded Wastewater Facilities

Similar to the Project, during construction of Alternative 2, a negligible amount of wastewater would be generated by construction workers. As such, the minimal wastewater generation during construction of the Project or Alternative 2 would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

During operation, Alternative 2 would have reduced sf and fewer employees in compared to the Project and as such would generate less wastewater than the Project's wastewater generation of 72,289 gpd or 0.072 million gallons per day (mgd) of wastewater. Given that the Project's wastewater would be accommodated by the existing infrastructure, the same would be true for Alternative 2 given its reduction is size and employees compared to the Project. Sanitary sewer connections and on-site infrastructure under the Project and Alternative 2 would be designed and constructed in accordance with applicable Culver City, LA Sanitation and Environment (LASAN), and California Plumbing Code standards. Furthermore, in accordance with CCMC Sections 5.02.220 and 5.02.035, as well as LAMC Sections 64.11 and 64.16.1, the Project and Alternative 2 would pay the required sewer connection and user fees, as applicable, to help offset the contribution to the wastewater collection infrastructure needs. Therefore, neither the Project nor Alternative 2 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities associated with the HWRP and impacts regarding wastewater infrastructure would be less than significant. Impacts related to new or expanded wastewater facilities under Alternative 2 would be less than the Project due to the overall reduction in building sf and employees under Alternative 2, which would generate less wastewater.

Wastewater Treatment Capacity

Similar to the Project, construction of Alternative 2 would generate a negligible amount of wastewater by construction workers. Any wastewater generation from construction activities would also not cause a measurable increase in wastewater flows requiring treatment at the HWRP. Accordingly, construction under the Project or Alternative 2 would result in a determination by HWRP that it has adequate capacity to serve the construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area).

During operation, Alternative 2 would have reduced sf and employees in comparison to the Project and as such would generate less wastewater than the Project. Given this, as the Project's wastewater would be accommodated by the HWRP, the same would be true for Alternative 2 given its reduction in wastewater generation compared to the Project. In addition, with regard to future flows, Alternative 2's wastewater generation would also be accommodated by the future 2026 capacity of the HWRP. As such, operation of the Project and Alternative 2 would result in a determination by HWRP that it has adequate capacity to serve the operational wastewater treatment demand of the

Project or Alternative 2, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant under both the Project and Alternative 2. Impacts related to wastewater treatment capacity under Alternative 2 would be less than the Project due to the overall reduction in building sf and employees under Alternative 2, which would generate less wastewater generation.

Solid Waste

Alternative 2 would require similar demolition as the Project. Project and Alternative 2 construction and demolition (C&D) activities would generate an estimated 8,993 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City of Los Angeles's Green Building Code (e.g., use of recyclables in building construction, etc.) and 435,000 gross tons of exported soils. Similar to the Project, all C&D waste generated by Alternative 2 would be delivered to a certified C&D Waste Processing Facility in accordance with AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate. The solid waste generated by construction of the Project or Alternative 2 would be a nominal percentage of the remaining disposal capacity of the Azusa Land Reclamation Landfill.

During operation, Alternative 2 would have reduced sf and employees in comparison to the Project and as such would generate less solid waste than the Project. Given this, as with the Project, the solid waste generated under Alternative 2 would represent a nominal percentage of the County's 2020 annual waste generation, the remaining capacity in 2020 in the County's Class III landfills, as well as the maximum daily capacity for the Sunshine Canyon Landfill, the landfill that is the primary recipient of Class III solid waste. As with the Project, Alternative 2 would not require the expansion or construction of a new solid waste disposal or recycling facility to handle waste. Therefore, operation of the Project or Alternative 2 would not 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, and impacts would be less than significant. Impacts related to solid waste under Alternative 2 would be less than the Project due to the overall reduction in building sf and employees under Alternative 2, which would generate less solid waste.

Electric Power, Natural Gas, Telecommunications Facilities

Alternative 2, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 2's electricity and natural gas demands are expected to represent a small fraction of Southern California Edison (SCE), LADWP and Southern California Gas Company (SoCalGas) energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's or Alternative 2's demand for electricity and natural gas. As with the Project, Alternative 2 would not result in an increase in demand for electricity, or natural gas, services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of electric power or natural gas infrastructure under Alternative 2 would be less than significant. As off-site electric power and natural gas infrastructure would accommodate demand under Alternative 2, impacts would be similar to the Project.

Relationship of the Alternative to Project Objectives

As described above, Alternative 2, Zoning-Compliant Alternative, would be developed in accordance with the existing IG and -EW Zone on the Culver City Parcel and C2-2D-CPIO zone, CPIO, and Expo TNP on the Los Angeles Parcel. Specifically, Alternative 2 would develop a total of 491,842 sf of office use on the Project Site compared to the Project's proposed 536,000 sf of office use, for an 8 percent reduction in total office building sf. Alternative 2 is considered to be consistent with the following objectives:

- Develop an integrated Project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.
- Provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site.
- Support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.

While Alternative 2 would provide similar office uses as the Project, it would provide these uses within a reduced building size, reduced occupancy, and with less parking per employee. As such, Alternative 2 would meet the following objectives, but to a lesser extent than the Project:

- Support City and regional goals and policies to reduce vehicle miles traveled and associated GHG and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.
- Provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy.
- Provide an amount of parking that satisfies anticipated demand on the Project Site but does not undercut transit usage.
- Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.
- Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.

5.5.3 Alternative 3: Reduced Project Alternative

Description of the Alternative

Under the Reduced Project Alternative (Alternative 3), the Project would see a 25 percent reduction in density and sf. With this reduction, Alternative 3 would include a total of 402,000 sf of creative office uses compared to the Project's proposed 536,000 sf of creative office uses. Specifically, Building 1 on the Culver City Parcel would include 125,250 sf, a reduction of 41,750 sf as compared to 167,000 sf in Building 1 under the Project. Building 2 on the Los Angeles Parcel would include 276,750 sf, a reduction of 92,250 sf as compared to 369,000 sf in Building 2 under the Project. The height of Building 1 would remain unchanged under Alternative 3 and would reach a maximum of 56 feet, although the fourth level of Building 1 would be significantly reduced as

compared to the Project. As Building 2 would consist of four stories instead of five stories as under the Project, the height of Building 2 would be reduced to a maximum of 56 feet, from the maximum of 75 feet proposed under the Project. Alternative 3 would include a similar publicly accessible amenity area as the Project.

While the number of vehicle parking spaces provided by Alternative 3 would be reduced from 1,216 spaces under the Project to 911 spaces under Alternative 3, this alternative would still require a three-level subterranean garages under both Building 1 and Building 2 and would require a maximum excavation depth of 50 feet. However, the footprint of the subterranean parking garages would be reduced, which would in turn reduce the amount of required soil excavation. Proposed circulation and loading dock locations would be similar under the Project and Alternative 3.

As with the Project, Alternative 3 would require the demolition of the existing buildings and associated paved surface parking areas on the Project Site. Given the reduced density and sf, the overall duration and intensity of construction under Alternative 3 would be less than that of the Project.

Environmental Impacts

Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that an employment center project in a designated urban TPA site is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. The Project is considered an employment center project[8] and is located on an infill site within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption of significant impact findings under SB 743. As such, no findings of significance are provided in Section 4.1, *Aesthetics*, of this Draft EIR. Nonetheless, the Project is compared to Alternative 3 herein only for information disclosure purposes.

Substantial Adverse Effect on a Scenic Vista

Similar to the Project, Alternative 3 would introduce above grade structures that would affect existing direct views across the Project Site during construction and operation. While Alternative 3 would include the construction of two total creative office buildings on the Culver City Parcel and the Los Angeles Parcel, Building 2 under Alternative 3 would be 15 feet shorter in height as compared to the Project. As with the Project, construction of Alternative 2 would affect views by the use of cranes, buildings under construction, construction fencing and the new buildings themselves. As with the Project, Alternative 3 would implement similar project design features as the Project that would ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (e.g., free of trash, graffiti, peeling postings and of

[8] Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area" The Culver City portion of the Site is zoned Industrial General (IG) and is within the East Washington Overlay (-EW), both of which allow commercial office uses. The portion of the Site located in the City of Los Angeles is zoned C2-2D-CPIO and is within the areas of the West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay (CPIO) and the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production, and neither the CPIO nor the Expo TNP restrict such uses.

uniform paint color or graphic treatment) throughout the construction period. In addition, as the buildings proposed under Alternative 3 and the Project would not block existing primary views from the Helms Bakery Building or Complex as the west façade of the Helms Bakery Building is already obstructed by existing development. Under both the Project and Alternative 3, the removal of the existing 8771 Washington building on the Project Site under Alternative 3 would open up new views on the portion of the Helms Bakery Building west elevation that includes windows and decorative details, thereby increasing the visibility of the Helms Bakery Building along Washington Boulevard. In the absence of existing scenic views across the Project Site, neither the Project or Alternative 3 would block or have an adverse effect on a scenic vista. Thus, despite the difference in height, the effects on scenic vistas under Alternative 3 would be similar to the Project.

Substantially Damage a Scenic Resource

Similar to the Project, Alternative 3 would be built within a highly urbanized area not located near any natural scenic resources or within proximity to a scenic highway. Alternative 3 would remove the street trees in proximity of the site, and as with the Project, Alternative 3 would comply with the City of Culver City and City of Los Angeles street tree replacement requirements. With regard to historic resources, Alternative 3 would be located in proximity to the Helms Bakery Building and Helms Bakery Complex. As the building setbacks proposed under Alternative 3 and the proposed amenity areas would be similar under both Alternative 3 and the Project, the primary facades of the Helms Bakery Building along Venice and Washington Boulevards, and all of its signage and landscape features would be more visible following development of Alternative 3 as compared to existing conditions. As with the Project, Alternative 3 would have not have a substantial adverse effect on a historical resource within the Project Site or the setting of the Helms Bakery Building or Helms Bakery Complex or a substantial adverse effect on a scenic resource. When compared to the Project, the effects on scenic resources under Alternative 3 would be similar to the Project.

Applicable Zoning and Other Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. Alternative 3 would develop similar uses as the Project but buildings proposed on the project site would be reduced by 25 percent. In addition, Alternative 3 would implement project design features that would require mechanical, electrical, and roof top equipment (including HVAC systems), as well as building appurtenances, to be integrated into the architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way. As the buildings proposed under Alternative 3 would be largely similar to that of the Project, development under Alternative 3 would not conflict with zoning and other regulations governing scenic quality for the City of Culver City and City of Los Angeles. When compared to the Project, impacts related to conflicting with regulations that govern scenic quality under Alternative 3 would be similar to the Project.

Substantial Light or Glare

As with the Project, Alternative 3 would introduce news sources of short-term lighting during the construction phase and new sources of lighting during the operation of this alternative. Similar to the Project, Alternative 3 would implement project design features that would require construction

and operational lighting to be shielded and directed downward (or on the specific on-site feature to be lit) to avoid undue glare or light trespass onto adjacent or nearby uses. In addition, all lighting would be consistent with City of Culver City and City of Los Angeles requirements. With regard to glare, glare sources under Alternative 3 would be similar to that of the Project and would also be regulated by City of Culver City and City of Los Angeles code requirements. Alternative 3 would also implement similar project design features that would require glass used in building façades to be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Furthermore, as it relates to shading shadow-sensitive uses, given that Building 2 under this alternative would be 15 feet shorter than the Building 2 proposed under the Project, Alternative 3 could result in a reduction to the limited shading to residential uses. As Building 1 would be a similar height under Alternative 3 as compared to the Project, the effects of shading shadow-sensitive uses would be similar. Based on the above, Alternative 3 would not adversely affect day or nighttime views. When compared to the Project, effects related to light and glare under Alternative 3 would be less than the Project given that shortened height of Building 2 would reduce shading.

Air Quality

Conflict with Air Quality Management Plan

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 3 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the City of Culver City General Plan and Mandatory Green Building Program, and the Air Quality Element of the City of Los Angeles General Plan that support and encourage reducing single occupancy vehicle trips and VMT. For all of these reasons, impacts under Alternative 3 with respect to consistency with AQMPs would be less than significant and similar to the Project. When compared to the Project, impacts related to conflicting with the AQMP under Alternative 3 would be similar to the Project.

Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

As with the Project, Alternative 3's construction phases have the potential to generate daily emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily emissions under Alternative 3 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; truck idling restrictions; maintenance of construction equipment; and discontinued use of construction activities during an AQI of 151 or more (unhealthy level), construction emissions under Alternative 3 would not exceed SCAQMD numerical construction significance thresholds, with the exception of concurrent

operation of Building 1 and the construction of Building 2. During this overlapping scenario, while accounting for implementation of Mitigation Measure AQ-MM-1, NO_X, emissions would exceed the SCAQMD thresholds of significance for NO_X, which conservatively are SCAQMD's operational significance thresholds. Daily operational thresholds of significance are lower than daily construction significance thresholds. Therefore, the Project's and Alternative 3's temporary impact related to overlapping operational and construction regional NO_X emissions would be significant and unavoidable.

However, Alternative 3 would reduce the scale of development by approximately 25 percent compared to the Project and would reduce the amount of soil excavation required and, thus, would slightly reduce overall construction duration. As Alternative 3 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Operation

During operation, Alternative 3 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, Alternative 3 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Also, mobile sources emissions under Alternative 3 would be reduced compared to the Project due to the reduction in traffic trips from the smaller overall size of Alternative 3. Similar to the Project, operational emissions under Alternative 3 would not exceed SCAQMD numerical significance thresholds for VOC, NO_X, CO, SO_X, PM10, and PM2.5, and emissions related to air quality standards would be less than significant. Overall, as Alternative 3 would be developed at a lower intensity and have less traffic than the Project, Alternative 3 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Exposure of Sensitive Receptors to Pollutant Concentrations

Localized Emissions

As with the Project, Alternative 3 would generate construction activity and traffic, and increase localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. As with the Project, maximum localized construction and operational emissions at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5. Therefore, similar to the Project, with respect to localized construction and operation emissions, impacts to sensitive receptors would be less than significant under Alternative 3. Alternative 3 would reduce the scale of the Project, the duration of construction, and building sf compared to the Project. The reduction in construction would reduce the duration of localized emissions during construction. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 3 would reduce daily operational localized emissions from less building energy demand, consumer product usage, and architectural coatings usage. Accordingly, impacts under Alternative 3 with respect to localized emissions would be less than the Project.

Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 3 than the Project. As such, as with the Project, Alternative 3 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 3 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

Toxic Air Contaminants

Construction

Under Alternative 3, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. The Project Site is not located within 500 feet of a freeway, 1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future employees and visitors to the Project Site. Alternative 3 would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction. In addition, Alternative 3 would be required to implement Mitigation Measure AQ-MM-1, which would have co-benefits of reducing emissions of PM10 and PM2.5, which are correlated to DPM emissions, from heavy-duty diesel construction equipment. As with the Project, Alternative 3 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. As Alternative 3 would reduce the duration of construction activities, impacts under Alternative 3 would be less than the Project.

Operation

Alternative 3 includes similar uses as the Project, which proposes the development of creative office uses. Alternative 3 would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Furthermore, trucks during operation of Alternative 3 would be required to comply with the applicable provisions of 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NOX emissions from existing diesel trucks. Therefore, as with the Project, operation of Alternative 3 would not be considered a substantial source of DPM. With respect to the use of consumer products and architectural coatings, the office uses associated with Alternative 3 would be expected to generate minimal TAC emissions from these sources. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the office uses Site, operation of Alternative 3 would not expose sensitive receptors to substantial TAC concentrations and operational impacts would be less than significant. However, because of Alternative 3's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 3 would be less than the Project.

Cultural Resources

Historical Resources

As described in Section 4.3, *Cultural Resources*, of this Draft EIR, no historical resources are located on the Project Site. As such, the demolition of the existing buildings in order to construct

the Project or Alternative 3 would not cause a substantial adverse change in the significance of a historical resource, as there are no historical resources on the Project Site as defined in CEQA Guidelines Section 15064.5. As it relates to indirect impacts to historical resources, the Project and Alternative 3 would construct proposed buildings in proximity to the Helms Bakery Building, which is a historic building within the Helms Bakery Complex. The buildings constructed under Alternative 3 would provide the same setbacks as the Project along Venice and National Boulevards. Under both the Project and Alternative 3, the overall massing of buildings and the Helms Bakery Building would be reasonably compatible and the spatial relationship between the buildings along the Venice Boulevard frontage would improve as compared to existing conditions by maintaining greater setbacks from Venice and the Helms alley. In addition, the proposed buildings under the Project or Alternative 3 would serve to increase visibility of the Helms Bakery Building and detract only minimally from the prominence of the Helms Bakery Complex within the built environment due to the demolition of the existing building at 8771 Washing Boulevard and the provision of a publicly accessible and privately maintained open space area in its place. Furthermore, as discussed below, Alternative 3, as with the Project, would not generate groundborne vibration in excess of the structural damage thresholds for the Helms Bakery Building. Additionally for the four other historical resources in the vicinity of the Project Site, any potential views from the Project Site of these historical resources under the Project or Alternative 3 would be obscured due to the presence of other existing intervening buildings, trees, and streets in the dense urban environment. Therefore, similar to the Project, Alternative 3 would not cause a substantial adverse change in the significance of an off-site historical resource. When compared to the Project, impacts related to historical resources under Alternative 3 would be similar to the Project.

Archaeological Resources

Similar to the Project, excavation associated with Alternative 3 would reach a maximum depth of 50 feet. The northern portion of the Project Site is assigned a low sensitivity for historic-period archaeological resource since no known previous uses existed in this area; however, the potential for historic-period archaeological resources in the southern portion of the Project Site is considered moderate to high. Also, the potential to encounter prehistoric archaeological resources is moderate across the entire Project Site; therefore, impacts to previously unknown buried historic and prehistoric archaeological resources are considered potentially significant. Alternative 3, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3. With the implementation of these measures, Alternative 3, as with the Project, would provide for appropriate treatment and/or preservation of archaeological resources if encountered. Under Alternative 3, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. When compared to the Project, impacts related to archaeological resources under Alternative 3 would be similar to the Project.

Energy

Efficient Energy Consumption

Similar to the Project, during construction of Alternative 3, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of the Project and Alternative 3 would also consume energy in the form of petroleum-based fuels associated with the use of off-road

construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Construction of the Project and Alternative 3 would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. Alternative 3 would have reduced sf as compared to the Project and would reduce the amount of soil excavation required. As such, the overall duration and intensity of construction would be less than that of the Project. A shorter construction duration would mean less overall electricity and transportation energy usage during construction under Alternative 3 than the Project.

During operation of the Project and Alternative 3, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste. As with the Project, Alternative 3 would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1, which requires achieving LEED Gold equivalent. Specifically, the Project and Alternative 3 would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. Similar to the Project, Alternative 3 would also concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. Furthermore, the Project and Alternative 3 would provide code-required bicycle parking spaces as well as EV charging stations. These measures would minimize operational transportation fuel demand consistent with State, regional, and City goals.

Section 4.4, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With its reduction in floor area of approximately 25 percent compared to the Project, Alternative 3 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption would be less than significant under Alternative 3 and because the scale of development would be less, impacts with respect to efficient energy consumption would be less than the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 3 is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project and Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Building Code, which have been incorporated into Culver City's Green Building Program and Los Angeles' Green Building Code. In addition, Alternative 3, as with

the Project, would be designed to achieve LEED Gold equivalent including energy performance optimization features, including, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. With respect to operational transportation-related fuel usage, the Project and Alternative 3 would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Similar to the Project, Alternative 3 includes the implementation of a TDM Program that would encourage efficient transportation and reduce VMT.

Based on the above, similar to the Project, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. When compared to the Project, impacts related to conflicting with plans for renewable energy or energy efficiency under Alternative 3 would be similar to the Project.

Geology and Soils

Seismic Hazards

No known active or potentially active faults bisect the Project Site, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone. The closest known active fault to the Project Site is the Newport-Inglewood Fault located approximately 0.21 miles to the east. In addition, similar to the Project, Alternative 3 building foundation and structural design and construction would be subject to the requirements of the seismic safety provisions of the CBC (Title 14, CCR, Part 2), which have been formulated to prevent building collapse during a design earthquake so that building occupants can evacuate buildings after an earthquake. Furthermore, with regard to liquefaction, compliance with existing regulations would substantially reduce the potential liquefaction hazard at the Project Site. Therefore, through compliance with applicable regulations and the recommendations in the detailed final geotechnical investigation, impacts related to seismic hazards would be less than significant under Alternative 3. When compared to the Project, impacts related to seismic hazards under Alternative 3 would be similar to the Project.

Soil Erosion or Loss of Topsoil

The Project Site has no topsoil; therefore, the Project or Alternative 3 would not cause the loss of topsoil. As the Project Site is larger than one acre, the construction activities at the Project Site under the Project or Alternative 3 would be required to obtain coverage under and comply with the Construction General Permit. As with the Project, Alternative 3 would be required to prepare and implement a SWPPP that would include various BMPs to control runoff from the construction site. Therefore, through compliance with applicable regulations, impacts related to erosion under Alternative 3 would be less than significant similar to the Project. When compared to the Project, impacts related to soil erosion and loss of topsoil under Alternative 3 would be similar to the Project.

Unstable Geologic Unit

Excavation under Alternative 3, as with the Project, would cause disturbance of existing soils and could contribute to potential liquefaction and lateral spreading, subsidence, or collapse. Compliance with CBC Sections 1803, 1304, and J104.3 would substantially reduce the potential for geologic stability issues by requiring construction, grading compaction, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions. The potential for subsidence at the Project Site is considered low. The CBC, which Culver City and the City of Los Angeles have adopted by reference, outlines foundation, footing and other design requirements to withstand the effects of normal levels of subsidence, and requires that detailed geotechnical studies be prepared for proposed development projects prior to building permit approval that outline design requirements specific to the proposed development site. Furthermore, with regard to collapse, grading activities under both the Project and Alternative 3 would occur in accordance with the requirements of the CBC, including with CBC Section 1304 and CBC Section J104.3, which would ensure the proper regrading and compaction is conducted, and would avoid the potential for collapse. Therefore, through compliance with applicable regulations, impacts related to unstable geologic unit under the Project and Alternative 3 would be less than significant. When compared to the Project, impacts related to seismic hazards under Alternative 3 would be similar.

Expansive Soils

The geotechnical investigation for the Project concluded that the Project Site soils would be capable of supporting the Project's proposed structures with recommended foundation design measures. Because Alterative 3 would include relatively similar excavation and structures as the Project, the same findings in the geotechnical investigation apply to Alternative 3. In addition, compliance with CBC Sections 1803, 1304, and J104.3 under the Project and Alternative 3 would substantially reduce the potential for expansive soils impacts by requiring construction, over-excavation and compaction of problematic soils, moisture management, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions including expansive soils. Therefore, through compliance with applicable regulations, impacts related to unstable geologic unit under the Project and Alternative 3 would be less than significant. When compared to the Project, impacts related to expansive soils under Alternative 3 would be similar.

Paleontological Resources

Excavation associated with Alternative 3 would reach a maximum depth of 50 feet, similar to the Project. As discussed in Section 4.5, *Geology and Soils*, of this Draft EIR, Geologic mapping indicates that the surface of the Project Site is underlain by Holocene-age alluvium (Qa), which have a low sensitivity for paleontological resources due to the young age of the deposits and are unlikely to preserve fossil resources. However, these sediments increase in age with depth, such that the deeper layers of this unit have a higher potential to preserve paleontological resources. In addition, the paleontological records search conducted through the NHMLAC also indicates that older (Pleistocene-age) geologic units in the vicinity of the Project Site have produced paleontological resources. Given the identification of numerous fossil specimens at depth during construction projects in the immediate vicinity, the positive results of NHMLAC records search, and since excavations for the Project and Alternative 3 would extend to depths of about 50 feet bgs,

the potential to encounter buried paleontological resources during construction is considered high. Similar to the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1, GEO-MM-2, and GEO-MM-3. With the implementation of these measures, impacts under the Project and Alternative 3 related to paleontological resources during Project construction would be reduced to a less-than-significant level. When compared to the Project, impacts related to paleontological resources under Alternative 3 would be similar.

Greenhouse Gas Emissions

Like the Project, construction and operation activities of the Project Site under Alternative 3, as with the Project, would increase GHG emissions. The smaller scale and lower mobile emissions associated with Alternative 3 would generate lower daily maximum GHG emissions than the Project's maximum GHG operational emissions. As with the Project, Alternative 3 would incorporate applicable project design features, including Project Design Feature GHG-PDF-1, which requires achieving LEED Gold equivalent, and Project Design Feature TRAF-PDF-1, which would include implementation of a TDM Program. GHG emission impacts under Alternative 3, as with the Project, would be less than significant. Due to its lower GHG emissions, under Alternative 3 with respect to GHG emissions, impacts on the environment would be less than the Project.

Alternative 3, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, Culver City's Green Building Program and City of Los Angeles Green Building Code, L.A.'s Green New Deal (Sustainability pLAn 2019), and the City's Green Building Code. As such, similar to the Project, impacts under Alternative 3 related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 3. Impacts related to GHG emissions would be similar to the Project.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials/Accidental Release of Hazardous Materials into the Environment

Construction

Construction of Alternative 3, as with the Project, would include demolition of existing buildings and parking areas. Existing on-site buildings may have ACM, LBP, and/or PCBs in some building materials. Remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences would reduce impacts to less than significant. Similar to the Project, Alternative 3 would also include the excavation of soil to construct three levels of underground parking under each building. However, the soils underlying the Project Site were found to contain presence of PCE in soil vapor, which has the potential to exceed environmental screening levels, although it is unlikely to exceed the multiple orders of magnitude higher Federal OSHA construction worker respiratory standards. In addition, benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above their respective MCLs. Based on the presence of PCE in soil vapor and other pollutants in the groundwater, Alternative 3 would implement mitigation similar to the Project, including Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would include the implementation of a

health and safety plan and implementation of soil and groundwater management plan. Impacts after implementation of mitigation would be less than significant under both the Project and Alternative 3.

Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions under both the Project and Alternative 3. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. The management of hazardous materials in accordance with all applicable regulations and standards during construction would reduce impacts to less than significant under both the Project and Alternative 3. When compared to the Project, impacts related to routine transport, use, or disposal of hazardous materials during construction of Alternative 3 would be similar to the Project.

Operation

As with the Project, operation of Alternative 3 would use and store small quantities of chemicals typical in office uses, such as cleaning solutions, paints, and thinners. Potentially, a few of the chemicals would be considered hazardous materials (e.g., bleach) and the anticipated volumes would be small (i.e., less than 5 gallons). Given that the quantities would be small, the routine use or an accidental spill of hazardous materials would render this impact less than significant under both the Project and Alternative 3. In addition, due to the contamination of groundwater underlying the Project Site, the installation of a groundwater barrier for the proposed parking garages under both the Project and Alternative 3 would serve to prevent intrusion of vapors from the groundwater surface into the indoor air of the structures and reduce the impact to less than significant. When compared to the Project, impacts related to routine transport, use, or disposal of hazardous materials during operation of Alternative 3 would be similar to the Project.

Emitting Hazards within One-Quarter Mile of a School

As with the Project, demolition and excavation activities at the Project Site under Alternative 3 would include the transportation and off-site disposal of hazardous waste. Construction of the Project and Alternative 3 would involve the temporary use of hazardous substances in the form of paints and thinners, glues and adhesives, solvents cleaning agents, and fuels and oils, which are all commonly used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. In addition, there are two schools within 0.25 miles of the Project Site. The nearest freeway to the Project Site is I-10, which is located north of the Project Site. The Project's Construction Management Plan (Project Design Feature TRAF PDF-1) would ensure construction-related vehicles are routed away from schools, as needed. Accordingly, with implementation of Project Design Feature TRAF-PDF-1, and through compliance with applicable regulations, construction-related impacts associated with handling of hazardous materials within 0.25 miles of a school would be less than significant under the Project and Alternative 3.

Once constructed, operation of the Project or Alternative 3 would not include the transport or disposal of significant amounts of hazardous materials. The proposed office uses would not cause

hazardous substance emissions or generate significant quantities of hazardous waste. Types of hazardous materials to be used in association with the Project or Alternative 3, such as small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, while the Project and Alternative 3 would emit small quantities of potentially hazardous materials typical of maintenance or operational uses within 0.25 miles of an existing or proposed school, all materials would be disposed of in accordance with applicable laws and regulations, and impacts would be less than significant.

When compared to the Project, impacts related to emitting hazards within 0.25 miles of a school under Alternative 3 would be similar to the Project.

Hazards Materials Database

Based on the review of regulatory databases provided in the Phase I ESA, the Project Site was listed for one and possibly two past asbestos removal projects, and for the storage of small quantities of hazardous materials by a past tenant. None of the listings reported releases, spills, or violations. The use of hazardous materials and the disposal of hazardous materials waste was conducted in accordance with federal, State, and local regulations. Therefore, while the Project Site is listed on hazardous materials lists, the listings do not include releases, spills, or violations. Under the Project or Alternative 3, in the event that additional ACM and/or LBP is discovered during demolition, impacts would be less than significant through remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences.

Thus, impacts related to development on a hazardous materials site under Alternative 3 would be similar to the Project.

Adopted Emergency Response Plan

Similar to the Project, construction activities under Alternative 3 would not require full street closures, and most construction activities would be confined to the Project Site. All streets that front the Project Site have at least two lanes in both directions, and only the one lane closest to the Project Site may require temporary closures. Therefore, at least one travel lane in each direction would be open at all times. In addition, similar to the Project, Alternative 3 would implement Project Design Feature TRAF PDF-1, which would include planning for and the management of construction traffic into and out of the Project Site. Because of the relatively short-term nature of the construction activities and with implementation of a Construction Management Plan, construction activities under the Project and Alternative 3 would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Once operational, the Project and Alternative 3 would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. Therefore, impacts regarding an adopted emergency response plan or emergency evacuation plan would be less than significant under the Project and Alternative 3. When compared to the Project, impacts related to an adopted emergency response plan under Alternative 3 would be similar to the Project.

Hydrology and Water Quality

Violate Water Quality Standards

Construction

As with the Project, construction of Alternative 3 could result in sediment and other pollutants being transported off-site by stormwater runoff, potentially degrading the water quality in off-site drainages and surface water bodies such as Ballona Creek. Because the overall footprint of construction activities would exceed one acre, the Project and Alternative 3 would be required to comply with the NPDES Construction General Permit and the local stormwater ordinances. The Construction General Permit requires preparation and implementation of a SWPPP, which requires applications of BMPs to control runoff from construction work sites. The construction of the underground parking garages under the Project and Alternative 3 would require excavation to about 50 feet bgs, which would be to a level below the shallowest observed depth to groundwater of 28.8 feet bgs. Consequently, the excavation would require dewatering to facilitate construction of the parking garages and foundations for the buildings. As with the Project, Alternative 3 would be required to comply with applicable NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties. With compliance with existing regulations, impacts associated with the discharge of dewatering effluent during construction of the Project and Alternative 3 would be less than significant. In addition, due to the presence of PCE in soil vapor and other pollutants in the groundwater, excavation activities during construction of the project and Alternative 3 could encounter contaminated soils or groundwater, which if not properly handled or disposed of, could potentially result in adverse impacts to surface or groundwater quality. As such, similar to the Project, Alternative 3 would implement Mitigation Measure HAZ-MM-2, which requires the preparation and implementation of a soil and groundwater management plan prior to and during construction. This mitigation measure would reduce impacts related to hazardous materials, as well as potentially significant impacts to surface or groundwater quality to a less-than-significant level. When compared to the Project, impacts related to violating water quality standards during construction of Alternative 3 would be similar to the Project.

Operation

Similar to the Project, Alternative 3 could generate pollutants of concern within stormwater runoff that can flow directly into storm drains and continue untreated. As with the Project, Alternative 3 would implement BMPs, including a capture and reuse system to comply with the LID standards, including capture and treatment of the 85th percentile storm event volume or 0.75-inch storm event. Since there are currently no existing on-site BMPs, stormwater runoff during post-development conditions under the Project and Alternative 3 would result in improved surface water quality. Due to the incorporation of the required LID BMPs, operation of the Project or Alternative 3 would not result in discharges that violate any water quality standards or waste discharge requirements; rather, they would improve water quality compared to existing conditions. Therefore, impacts resulting from operation of the Project or Alternative 3 would be less than significant with respect to surface water quality and groundwater quality. When compared to the Project, impacts related to violating water quality standards during operation of Alternative 3 would be similar.

Decrease Groundwater Supplies

Construction

As with the Project, groundwater is anticipated to be encountered during construction of Alternative 3 and temporary dewatering is likely to be required, which could affect groundwater supplies. To facilitate excavation to depths below groundwater, dewatering may be necessary. Temporary pumps and filtration would be used in compliance with all applicable regulations and requirements, including NPDES permitting requirements and LARWQCB WDRs for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties, or any other appropriate WDR permits identified by the LARWQCB, and local regulations. As the groundwater table would be allowed to stabilize and recharge during construction after the basement levels can withstand hydrostatic forces, dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Based on the above, the construction of the Project or Alternative 3 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management of the basin, and impacts would be less than significant. When compared to the Project, impacts related to decreasing groundwater supplies or recharge during construction of Alternative 3 would be similar to the Project.

Operation

Similar to the Project, Alternative 3 would include two underground parking garages that would extend to 50 feet bgs, which would be below the shallowest observed depth to groundwater of 28.8 feet bgs. Under the Project or Alternative 3, the design of the underground floors and slabs would withstand hydrostatic pressure. With proper design of the underground parking garages, permanent dewatering would not be required and would not impact groundwater supplies. In addition, the Project or Alternative 3 would not include injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system, and would not affect groundwater supplies. Based on the analysis above, the operation of the Project or Alternative 3 would not significantly decrease groundwater supplies or interfere with groundwater recharge such that they could impede sustainable groundwater management of the basin, and impacts would be less than significant. When compared to the Project, impacts related to decreasing groundwater supplies or recharge during operation of Alternative 3 would be similar to the Project.

Substantially Alter Existing Drainage Pattern

Construction

Similar to the Project, construction activities under Alternative 3 would alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Changes in the drainage pattern could result in on- or off-site flooding, or exceeding the capacity of existing or planned stormwater drainage systems. Since the construction site would be greater than one acre, the Project and Alternative 3 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project or Alternative 3 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows, prevent pollution, and avoid on- or off-site

flooding. BMPs would ensure that runoff is within the capacity of existing or planned stormwater drainage systems and would prevent any water from off-site sources from freely flowing into or across the Project Site. No other construction activities would require an increase in the use of water that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under construction of Alternative 3, as with the Project, would be less than significant. When compared to the Project, construction-related impacts related substantially altering existing drainage patterns under Alternative 3 would be similar to the Project.

Operation

Alternative 3, as with the Project, would comply with LID requirements to ensure that stormwater treatment with operational BMPs would control pollutants associated with storm events up to the 85th percentile storm event. Drainage patterns for the Project Site would be changed because runoff would no longer be entirely discharged to the municipal storm drain system, as it is now. As part of the City of Culver City and City of Los Angeles requirements to manage post-construction stormwater runoff, the Project and Alternative 3 would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site to collect roof and site runoff and direct stormwater through a series of underground storm drain pipes to the underground cisterns for later use as landscaping water. Similar to the Project, implementation of the proposed LID BMPs under Alternative 3 for both cities and compliance with Culver City SUSMP requirements would reduce the volume of stormwater runoff discharged from the Project Site and prevent on- or off-site erosion of siltation. The reduction in the volume of stormwater runoff would also reduce the volume of flow to stormwater drainage systems and no new off-site storm drainage infrastructure would be needed based on the on-site improvements. Given that similar buildings and landscaping is proposed under Alternative 3 and the Project, similar drainage conditions would occur, which would result in a decrease in impervious areas and an increase in volume of storm water infiltrated on-site. Therefore, the Project or Alternative 3 would not alter the course of a stream or river or increase the amount of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Furthermore, the Project or Alternative 3 would not change the direction of flow or impede any floodwater from off-site sources. With implementation of LID BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under operation of Alternative 3, as with the Project, would be less than significant. When compared to the Project, impacts related to substantially altering existing drainage patterns during operation of Alternative 3 would be similar to the Project.

Water Quality Control Plan

Alternative 3, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in applicable local and State water quality regulations for the protection of water resources. Alternative 3, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES stormwater permitting program. In compliance with

the LID requirements, the Project and Alternative 3 would install a capture and reuse system. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with LID requirements. As with the Project, impacts related to water quality control plans under Alternative 3 would be less than significant. When compared to the Project, impacts related to consistency with water quality control plans under Alternative 3 would be similar to the Project.

New or Expanded Stormwater Drainage Facilities

Similar to the Project, surface runoff on the Project Site under Alternative 3 would be collected by building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would then convey flows to underground cisterns for later use as landscaping water. As compared to existing conditions, both the Project and Alternative 3 would reduce the existing volume of runoff discharged from the Project Site to the municipal storm drain system during storm events. Consequently, the volume of flow to stormwater drainage systems would be reduced, and no new off-site storm drainage infrastructure would be needed based on the on-site improvements. As such, the Project or Alternative 3 would not result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. As with the Project, impacts under Alternative 3 would be less than significant. When compared to the Project, impacts related to new or expanded stormwater drainage facilities under Alternative 3 would be similar.

Land Use and Planning

Alternative 3 proposes the development of 402,000 sf of office use on the Project Site. Specifically, Building 1 on the Culver City Parcel would include 125,250 sf of office use and would have a maximum building height of 56 feet under this alternative. Under Alternative 3, Building 2 on the Los Angeles Parcel would include 276,750 sf of office use with a maximum building height of 56 feet. Alternative 3 would include a similar publicly accessible amenity area as the Project. Similar to the Project, Alternative 3 would be consistent with applicable zoning standards with approval of proposed entitlements.

As with the Project, the density and location of Alternative 3 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including: SCAG's 2020–2045 RTP/SCS, the Culver City General Plan, the Culver City Bicycle & Pedestrian Action Plan, the Culver City Urban Forest Master Plan, the Culver City Redevelopment Plan for the Culver City Redevelopment Project, the DFD Exposition Light Rail Transit and Station Area, the Culver City TOD Visioning Study and Recommendations, the Culver City Municipal Code, the City of Los Angeles General Plan Framework and Conservation Elements, the West Adams–Baldwin Hills–Leimert Community Plan, and the Los Angeles Municipal Code. and, as such, impacts with respect to land use would be less than significant. Based on the above, and as similar changes to zoning and land use designations would be required under Alternative 3 as with the Project, impacts related to land use and planning would be similar to the Project.

Noise

Noise Levels in Excess of Standards

Construction

Construction activities under Alternative 3 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 3 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 3 would be the same as the Project. Based on a conservative impact analysis, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise-sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 NOI-MM-2 would be implemented under Alternative 3 to reduce construction noise impacts at off-site noise-sensitive receptors. However, as with the Project, even with implementation of mitigation measures, potentially significant on-site construction noise impacts would remain significant and unavoidable under Alternative 3. With regard to off-site construction noise, the increase in noise levels of construction trips along any of the studied roadway segments would not exceed the significance threshold, and impacts would be less than significant. The overall duration and intensity of construction under Alternative 3 would be less than that of the Project. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 3 would be less than the Project.

In addition, as discussed in Section 4.10, *Noise*, cumulative noise impacts from on-site construction noise and off-site construction noise (construction vehicles) would be significant and unavoidable for the Project. Alternative 3 would also result in similar significant and unavoidable cumulative noise impacts, however, they would occur for a shorter duration under Alternative 3 than under the Project. Thus, cumulative construction-related significant and unavoidable impacts related to construction noise under Alternative 3 would be less than the Project.

Operation

Alternative 3, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed mechanical equipment noise, parking structure noise, dock area noise, and open space noise. However, Alternative 3 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 3 than the Project. As the Project would not exceed the significance thresholds for off-site traffic noise, off-site traffic noise impacts under Alternative 3 would also not exceed any significance thresholds and impacts would be less than significant.

With a decrease in sf of creative office uses compared to the Project, operational noise levels would be incrementally less than the Project. Under Alternative 3, fixed mechanical equipment, including air conditioning equipment and an emergency generator, and loading docks and refuse collection would be located in similar locations as the Project and would include similar enclosures. As with the Project, noise levels from these sources under Alternative 3 would be less significant. In addition, parking under Alternative 3 would be provided in two subterranean parking areas with

similar vehicular access to the Project Site as the Project. As with the Project, these parking areas would not result in significant increases in ambient noise levels at the off-site sensitive receptor locations. Impacts from parking facilities under Alternative 3, as with the Project, would be less than significant. Furthermore, as outdoor open spaces would be similar in size under Alternative 3 as with the Project, noise generated by outdoor spaces would be similar under Alternative 3. As the noise contribution from outdoor spaces would be minimal and impacts would be less than significant under the Project, outdoor noise generated under Alternative 3 would similarly be less than significant. Overall, composite operational noise levels would be less than significant under both the Project and Alternative 3. However, given the reduced number of employees and vehicle trips under Alternative 3, operational noise impacts would be less under Alternative 3 than the Project.

Groundborne Vibration

Construction

Construction of Alternative 3, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, and haul trucks, etc.). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 3 would be below the structural damage significance criteria at off-site building structures. In addition, as with the Project, the structural damage vibration impacts from off-site construction traffic would also be below the structural damage significance criteria. Regarding off-site vibration, as with the Project, the estimated vibration levels due to off-site construction activities would not exceed the structural damage threshold, but would exceed the human annoyance threshold for residential uses. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage and on-site vibration for human annoyance would be less than significant; however off-site vibration for human annoyance would be significant and unavoidable. As the overall scale of development would be slightly reduced under Alternative 3, the duration of construction and overall construction activity causing vibration would be slightly less, therefore impacts under Alternative 3 would be less than the Project.

Operation

Day-to-day operations under Alternative 3, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold. Therefore, similar to the Project, operational vibration impacts under Alternative 3 would be less than significant. While Alternative 3 would reduce the overall occupancy of the Project Site, a change in off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 3 compared to the Project, and, as such, impacts under Alternative 3 would be similar to the Project.

Public Services

Fire Protection

Alternative 3, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. As with the Project, Alternative 3 would comply with all regulatory requirements including regulations set forth in the Safety and Health Regulations for Construction established by OSHA and compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. In addition, the Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1 to provide a Construction Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The implementation of regulatory requirements and project design features would facilitate emergency access. As such, similar to the Project, construction under Alternative 3 would result in less-than-significant impacts related to fire protection.

During operation, Alternative 3 would result in a lower number of employees on the Project Site as compared to the Project given the smaller building sizes on the Project Site proposed under Alternative 3. Alternative 3, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, and other CCMC, LAMC, CCFD, and LAFD requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, and manual smoke evacuation systems in the underground parking structure on the Culver City Parcel; installation of Knox Boxes; provision of fire resistant doors, materials, walkways, stairwells, elevator systems (including emergency and fire control elevators), smoke detectors, and signage, among other fire prevention features. Compliance with applicable requirements under both the Project and Alternative 3 would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, both buildings under the Project and Alternative 3 would be required to install an automatic fire sprinkler system. As the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response under the Project or Alternative 3 would not be significant. Alternative 3, as with the Project, would also be consistent with CCFD and LAMC fire flow requirements. As such, the Project and Alternative 3 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 3, as with the Project, would be less than significant. However, because Alternative 3 would reduce construction duration and Project Site occupancy (employees) compared to the Project, impacts related to fire protection services under Alternative 3 would be less than the Project.

Police Protection

Alternative 3, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 3's construction phase, although of shorter duration than that of the Project, could increase in demand for police protection services. To reduce CCPD and LAPD demand during construction, Alternative 3, as with the Project, would implement security measures under Project Design Feature POL-PDF-1 to limit access to construction areas and provide for cameras to monitor

the Project Site during off hours. Similar to the Project, construction activities under Alternative 3 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 3 would implement Project Design Features TRAF-PDF-1. Under Project Design Features TRAF-PDF-1, a Construction Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Furthermore, it is not anticipated that any additional officers from CCPD or LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses.

As with the Project, operation of Alternative 3 would only contribute to increasing the number of non-resident site populations (visitors and employees). As such, the Project or Alternative would not directly generate any new residential population in the City of Culver City or City of Los Angeles. In addition, Alternative 3 would result in a lower number of employees on the Project Site as compared to the Project given the smaller building sizes on the Project Site proposed under Alternative 3. Thus, the existing CCPD officer-to-daytime population ratio of approximately 1:2,752 and the LAPD officer-to-population ratio of approximately 1:951 would increase incrementally less under operation of Alternative 3 as compared to the Project. Therefore, while minor staffing changes may be required as a result of the Project or Alternative 3, no new or expanded police facilities would be needed as a result of implementation of either. Moreover, as with the Project, demand for police services under Alternative 3 would be reduced with implementation of Project Design Feature POL-PDF-2, which includes the implementation of gated and illuminated parking structure entries, controlled keycard access to office spaces, security lighting within common areas and entryways, and CCTV, which would help to offset the Project's operational demand for police protection services. With the implementation of Project Design Feature POL-PDF-2, the Project or Alternative 3 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 3, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy (employees) under Alternative 3, impacts to police protection services under Alternative 3 would be less than the Project.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Similar to the Project, Alternative 3 would support multimodal transportation options as well as promote transportation-related safety in the vicinity. Alternative 3, as with the Project, would not conflict with policies of the Culver City General Plan Circulation and Element, Culver City Short Range Mobility Plan, Culver City Bicycle and Pedestrian Action Plan, Culver City Complete Streets Policy, Los Angeles Mobility Plan, Los Angeles Plan for a Healthy Los Angeles, Los Angeles Citywide Design Guidelines, Los Angeles Municipal Code, Los Angeles Vision Zero, and the Los Angeles West adams–Baldwin Hills–Leimert Community Plan. As with the Project, Alternative 3 would implement Project Design Feature TRAF-PDF-2, which would include

implementation of a TDM Program that would help to reduce volumes on nearby roadways due to employee commute and encourage transit ridership through various programs. Alternative 3, as with the Project, would not conflict with any of the policies and procedures contained in the above-mentioned City of Culver City and City of Los Angeles transportation-related programs, plans, ordinances, and policies. As such, impacts relative to plans and programs would be less than significant. When compared to the Project, impacts related to conflicting with programs, plans, ordinances, and policies, addressing the circulation system under Alternative 3 would be similar to the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As with the Project, Alternative 3 would be located less than 600 feet from the Metro "E" Line Culver City Station, which qualifies it for VMT screening as specified in the City of Culver City's TSCG. Therefore, a VMT analysis is not required for the Project or Alternative 3, and the Project and Alternative 3 would have a less-than-significant impact with respect to VMT. Similar to the Project, Alternative 3 would also implement Project Design Feature TRAF-PDF-2, which includes the implementation of a TDM Program that would consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Both the Project and Alternative 3 would be consistent with CEQA Guidelines Section 15064.3, Subdivision (b) and impacts would be less than significant. However, because Alternative 3 would generate fewer employees than the Project, it would generate less overall VMT. In consideration of the above, impacts pertaining to consistency with CEQA Guidelines Section 15064.3, Subdivision (b) would be similar under the Project and Alternative 3.

Design Hazards

Alternative 3, as with the Project, would design driveways to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040) and City of Los Angeles Bureau of Engineering Standards (S-440-4). The driveways would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The Project or Alternative 3 would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. With regard to freeway safety, under the Project the projected queue lengths would not exceed the available storage lengths at any of the three studied off-ramps in either the morning or the afternoon peak hours. As Alternative 3 would generate fewer trips to/from the Project Site, projected queue lengths would similarly not exceed the available storage lengths under Alternative 3. Impacts under Alternative 3 would be less than significant and similar to the Project.

Emergency Access

The Project Site is located within an urbanized area with a fully developed roadway system. Similar to the Project, Alternative 3 would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. The Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1, which would require construction staging and construction worker parking to be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency

vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. In addition, future driveway and building configurations under the Project and Alternative 3 would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 3, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 3 would be less than significant and similar to the Project.

Tribal Cultural Resources

The City complied with AB 52 in its Native American tribal consultation and records searches conducted through SCCIC and the NAHC. No known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. No known tribal cultural resources, as defined in PRC Section 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of AB 52 consultation, or as a result of the SLF search through the NAHC and the SCCIC. However, due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and Ballona Creek, the Project Site's location in the general vicinity of an unnamed village (located approximately 0.3 miles southeast), and given recent discoveries during other construction projects in the vicinity, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, similar to the Project, Alternative 3 would implement Mitigation Measure CUL-MM-2 and Mitigation Measures TCR-MM-1 through TCR-MM-3. With implementation of mitigation measures, impacts under the Project and Alternative 3 would be reduced to less-than-significant levels. When compared to the Project, impacts related to tribal cultural resources under Alternative 3 would be similar to the Project.

Utilities and Service Systems

Water Supply

New or Expanded Water Facilities

Under Alternative 3, while construction duration would be slightly reduced as compared to the Project, the conservative estimate of construction water use would similarly range from 1,000 to 2,000 gpd under Alternative 3 as with the Project. The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project or Alternative 3. Therefore, impacts would be similar and less than significant. Water service for the Project or Alternative 3 would be provided by GSWC and LADWP, as under existing conditions. When analyzing infrastructure capacity, although domestic water demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. Given the relatively similar size and footprint of the proposed

buildings under Alternative 3 as compared to the Project, CCFD and LAFD requirements would be the same for both Alternative 3 and the Project. The existing hydrants in the area of the Project Site would provide adequate fire flow meeting the requirements of CCFD and LAFD. As such, operation of the Project or Alternative 3 would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects and impacts would be less than significant. When compared to the Project, impacts related to new for expanded water facilities under Alternative 3 would be similar to the Project.

Water Supplies

While construction duration would be slightly reduced as compared to the Project, the conservative estimate of construction water use would similarly range from 1,000 to 2,000 gpd under Alternative 3 as with the Project. The estimated construction water use would be less than the existing domestic water use of approximately 2,800 gpd for the Project Site. As such, existing water supplies would be available to meet the temporary water demand associated with construction of the Project.

Similar to the Project, Alternative 3 would require the preparation of a WSA. During operation, Alternative 3 would have reduced sf in comparison to the Project and as such would generate water demand that would be less than the Project's water demand of 85 AFY. In addition, Alternative 2 would implement similar project design features as the Project to implement water conservation reductions. Given that the Project's water demand would be within GSWC's and LADWP's 2020 UWMPs projected water supplies for normal, single-dry, and multiple-dry years through the year 2045 and is also within the GSWC and LADWP 2020 UWMP's 25-year water demand growth projections, the same would be true for Alternative 3 given its reduction is size and employees compared to the Project. As such, sufficient water supplies would be available to serve the Project and Alternative 3 and reasonably foreseeable future development during normal, dry and multiple dry years. Water supply impacts would be less than significant under the Project and Alternative 3. Impacts related to water supply under Alternative 3 would be less than the Project due to the overall reduction in building sf and employees under Alternative 3, which would generate less water demand.

Wastewater

New or Expanded Wastewater Facilities

Similar to the Project, during construction of Alternative 3, a negligible amount of wastewater would be generated by construction workers. As such, the minimal wastewater generation during construction of the Project or Alternative 3 would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

During operation, Alternative 3 would have reduced sf and fewer employees in compared to the Project and as such would generate less wastewater than the Project's wastewater generation of 72,289 gpd or 0.072 mgd of wastewater. Given that the Project's wastewater would be accommodated by the existing infrastructure, the same would be true for Alternative 3 given its reduction is size and employees compared to the Project. Sanitary sewer connections and on-site infrastructure under the Project and Alternative 3 would be designed and constructed in accordance

with applicable Culver City, LASAN and California Plumbing Code standards. Furthermore, in accordance with CCMS Sections 5.02.220 and 5.02.035, as well as LAMC Sections 64.11 and 64.16.1, the Project and Alternative 3 would pay the required sewer connection and user fees, as applicable, to help offset the contribution to the wastewater collection infrastructure needs. Therefore, the Project or Alternative 3 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities associated with the HWRP and impacts regarding wastewater infrastructure would be less than significant. Impacts related to new or expanded wastewater facilities under Alternative 3 would be less than the Project due to the overall reduction in building sf and employees under Alternative 3, which would generate less wastewater.

Wastewater Treatment Capacity

Similar to the Project, construction of Alternative 3 would generate a negligible amount of wastewater by construction workers. Any wastewater generation from construction activities would also not cause a measurable increase in wastewater flows requiring treatment at the HWRP. Accordingly, construction under the Project or Alternative 3 would result in a determination by HWRP that it has adequate capacity to serve the construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area).

During operation, Alternative 3 would have reduced sf and employees in comparison to the Project and as such would generate less wastewater than the Project. Given this, as the Project's wastewater would be accommodated by the HWRP, the same would be true for Alternative 3 given its reduction in wastewater generation compared to the Project. In addition, with regard to future flows, Alternative 3's wastewater generation would also be accommodated by the future 2026 capacity of the HWRP. As such, operation of the Project and Alternative 3 would result in a determination by HWRP that it has adequate capacity to serve the operational wastewater treatment demand of the Project or Alternative 3, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant under both the Project and Alternative 3. Impacts related to wastewater treatment capacity under Alternative 3 would be less than the Project due to the overall reduction in building sf and employees under Alternative 3, which would generate less wastewater generation.

Solid Waste

Alternative 3 would require similar demolition as the Project, but would reduce the amount of soil excavation required. Solid waste generated during Alternative 3 would be less than that of the Project C&D activities, which would generate an estimated 8,993 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City of Los Angeles's Green Building Code (e.g., use of recyclables in building construction, etc.) and 435,000 gross tons of exported soil. Similar to the Project, all C&D waste generated by Alternative 3 would be delivered to a certified C&D Waste Processing Facility in accordance with AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate. The solid waste generated by construction of the Project or Alternative 3 would be a nominal percentage of the remaining disposal capacity of the Azusa Land Reclamation Landfill.

During operation, Alternative 3 would have reduced sf and employees in comparison to the Project and as such would generate solid waste that the Project. Given this, as with the Project, the solid waste generated under Alternative 3 would represent a nominal percentage of the County's 2020 annual waste generation, the remaining capacity in 2020 in the County's Class III landfills, as well as the maximum daily capacity for the Sunshine Canyon Landfill, the landfill that is the primary recipient of Class III solid waste. As with the Project, Alternative 3 would not require the expansion or construction of a new solid waste disposal or recycling facility to handle waste. Therefore, operation of the Project or Alternative 3 would not 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, and impacts would be less than significant. Impacts related solid waste under Alternative 3 would be less than the Project due to the overall reduction in building sf and employees under Alternative 3, which would generate less solid waste.

Electric Power, Natural Gas, Telecommunications Facilities

Alternative 3, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 3's electricity and natural gas demands are expected to represent a small fraction of SCE, LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's or Alternative 3's demand for electricity and natural gas. As with the Project, Alternative 3 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of electric power or natural gas infrastructure under Alternative 3 would be less than significant. As off-site electric power and natural gas infrastructure would accommodate demand under Alternative 3, impacts would be similar to the Project.

Relationship of the Alternative to Project Objectives

As described above, Alternative 3, Reduced Project Alternative, would develop similar uses as the Project but buildings proposed on the project site would be reduced by 25 percent. Specifically, Alternative 3 would develop a total of 402,000 sf of creative office uses compared to the Project's proposed 536,000 sf of creative office uses. Alternative 3 is considered to be fully consistent with the following objectives:

- Develop an integrated Project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.
- Provide an amount of parking that satisfies anticipated demand on the Project Site but does not undercut transit usage.
- Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.
- Provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site.
- Support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.

While Alternative 3 would provide similar office uses as the Project, it would provide these uses within a reduced building size and reduced occupancy. As such, Alternative 3 would meet the following objectives, but to a lesser extent than the Project:

- Support City and regional goals and policies to reduce vehicle miles traveled and associated GHG and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.
- Provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy.
- Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.

5.5.4 Alternative 4: Alternate Project Access Alternative

Description of the Alternative

Under the Alternate Project Access Alternative (Alternative 4), the design, use programming and configurations of Buildings 1 and 2 proposed under the Project would remain the same. However, the difference in Alternative 4 compared to the Project is the addition of a traffic signal at the intersection of Venice Boulevard and the proposed driveway along Venice Boulevard, located at the eastern edge the northern Project Site boundary, and the removal of office-related vehicular access on Washington Boulevard (the Washington Boulevard driveway would continue to serve as emergency access). As the required demolition, building sf, heights, land use uses, amenity areas, and proposed subterranean parking would be the same under Alternative 4 and the Project, it is assumed that the overall duration and intensity of construction under Alternative 4 would be similar to that of the Project.

Given that the on-site Project characteristics would be essentially the same under both Alternative 4 and the Project, it can be concluded that impacts related to aesthetics, air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, tribal cultural resources, and utilities and service systems would be similar to those of the Project and no further analysis is required. The proposed signal along Venice Boulevard would not materially impact the analysis and conclusions of these issue areas. However, the proposed signal would affect trip distribution and intersection volumes, which may impact noise and transportation impacts. As such, analyses related to noise and transportation are provided below.

Environmental Impacts

Noise

Noise Levels in Excess of Standards

Construction

Construction activities under Alternative 4 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 4 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 4 would be the same as the Project. While installation of a traffic signal along Venice Boulevard would bring construction activities closer to noise-sensitive uses (i.e., residential uses to the north of the Project Site across Venice Boulevard), construction equipment used for installation of the signal (e.g., drill rig, crane, and smaller hand tools), would not be expected to emit high levels of noise for sustained periods of time. Nonetheless, with added equipment in closer proximity to sensitive receptors, construction noise levels could be incrementally higher than the Project during construction of the traffic signal. Therefore, as with the Project, Mitigation Measures NOI-MM-1 and NOI-MM-2 would be implemented under Alternative 4 to reduce construction noise impacts at off-site noise-sensitive receptors. However, as with the Project, even with implementation of mitigation measures, potentially significant on-site construction noise impacts would remain significant and unavoidable under Alternative 4. With regard to off-site construction noise, the increase in noise levels of construction trips along any of the studied roadway segments would not exceed the significance threshold, and impacts would be less than significant under the Project and Alternative 4. The overall duration and intensity of construction under Alternative 4 would be similar to that of the Project. Overall, while noise levels would be generally similar throughout most of the construction activities, because Alternative 4 would introduce construction equipment closer to noise-sensitive receptors, its construction-related noise impacts are considered slightly greater than the Project.

In addition, as discussed in Section 4.10, *Noise*, cumulative noise impacts from on-site construction noise and off-site construction noise (construction vehicles)would be significant and unavoidable for the Project. Alternative 4 would also result in similar significant and unavoidable cumulative noise impacts. However, as discussed above, because Alternative 4 would introduce construction equipment closer to noise-sensitive receptors, its construction-related noise impacts are considered slightly greater than the Project.

Operation

Alternative 4, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed mechanical equipment noise, parking structure noise, dock area noise, and open space noise.

As it relates to operational traffic noise, the introduction of the signal on Venice Boulevard and the removal of the Washington Boulevard entrance for vehicular trips would change the trip

distribution and intersection volumes. While the trip distribution and intersection volumes under Alternative 4 would be different compared to those analyzed under the Project, the resulting variations in volumes on the local street segments would not substantially change such that substantial changes to roadway segment noise levels would occur and no new significant impacts would occur. In addition, as noted previously, the project characteristics would be the same under both Alternative 4 and the Project, including the location of fixed mechanical equipment, loading docks and refuse collection, the location of vehicular access to the subterranean parking garages, and location and size of outdoor open spaces. As such, impacts related to on-site operational noise would be less than significant under the Project and Alternative 4, with impacts similar to the Project.

Groundborne Vibration

Construction

Construction of Alternative 4, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (e.g., backhoe, dozer, excavators, grader, loader, and haul trucks). As with the Project, the estimated vibration velocity levels from all on-site construction equipment (maximum construction conditions) under Alternative 4 would be below the structural damage and human annoyance significance criteria at off-site building structures and sensitive receptor locations. The installation of the signal on Venice Boulevard under Alternative 4 would include the use of a drill rigs, cranes, and smaller hand tools in locations closer to sensitive receptors. However, drill rigs and cranes are not significant sources of vibration. As such, it can be reasonably concluded that estimated vibration velocity levels from the introduction of drill rigs would be below the structural damage and human annoyance significance criteria at off-site building structures and sensitive receptors, with any variations in vibration levels being imperceptible regarding human annoyance. Regarding off-site vibration, as with the Project, the estimated vibration levels due to off-site construction activities would not exceed the structural damage threshold, but would exceed the human annoyance threshold for residential uses. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage and on-site vibration for human annoyance would be less than significant; however off-site vibration for human annoyance would be significant and unavoidable. As such, impacts related to construction vibration under Alternative 4 would be similar to the Project.

Operation

Day-to-day operations under Alternative 4, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold. Therefore, similar to the Project, operational vibration impacts under Alternative 4 would be less than significant. When compared to the Project, impacts related to groundborne operation vibration under Alternative 4 would be similar to the Project.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Similar to the Project, Alternative 4 would support multimodal transportation options as well as promote transportation-related safety in the vicinity. Alternative 4, as with the Project, would not conflict with policies of the Culver City General Plan Circulation and Element, Culver City Short Range Mobility Plan, Culver City Bicycle and Pedestrian Action Plan, Culver City Complete Streets Policy, Los Angeles Mobility Plan, Los Angeles Plan for a Healthy Los Angeles, Los Angeles Citywide Design Guidelines, Los Angeles Municipal Code, Los Angeles Vision Zero, and the Los Angeles West Adams–Baldwin Hills–Leimert Community Plan. As with the Project, Alternative 4 would implement Project Design Feature TRAF-PDF-2, which would include implementation of a TDM Program that would help to reduce volumes on nearby roadways due to employee commute and encourage transit ridership through various programs. Alternative 4, as with the Project, would not conflict with any of the policies and procedures contained in the above-mentioned City of Culver City and City of Los Angeles transportation-related programs, plans, ordinances, and policies. As such, impacts relative to plans and programs would be less than significant. When compared to the Project, impacts related to conflicting with programs, plans, ordinances, and policies, addressing the circulation system under Alternative 4 would be similar to the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As with the Project, Alternative 4 would be located less than 600 feet from the Metro "E" Line Culver City Station, which qualifies it for VMT screening as specified in the City of Culver City's TSCG. Therefore, a VMT analysis is not required for Alternative 4, and Alternative 4 would have a less-than-significant impact with respect to VMT. Similar to the Project, Alternative 4 would also implement Project Design Feature TRAF-PDF-2, which includes the implementation of a TDM Program that would consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. When compared to the Project, impacts related to consistency with CEQA Guidelines Section 15064.3, Subdivision (b) under Alternative 4 would be similar to the Project.

Design Hazards

Alternative 4, as with the Project, would design driveways to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040) and City of Los Angeles Bureau of Engineering Standards (S-440-4). The driveways would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. In addition, under Alternative 4, a traffic signal would be installed at the proposed driveway on the Los Angeles Parcel located along Venice Boulevard. The addition, of this signal would serve to further minimize potential conflicts with pedestrian traffic and vehicles accessing the Project Site. Alternative 4 would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. With regard to freeway safety, under the Project the projected queue lengths would not exceed the available storage lengths at any of the three studied off-ramps in either the morning or the afternoon peak hours. As Alternative 4 would generate similar trips to/from the Project Site, projected queue lengths would similarly not exceed the

available storage lengths under Alternative 4. Impacts under Alternative 4 would be less than significant. When compared to the Project, impacts related to design hazards would be less than the Project due to the installation of a traffic signal on Venice Boulevard.

Emergency Access

The Project Site is located within an urbanized area with a fully developed roadway system. Similar to the Project, Alternative 4 would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. Alternative 4 would require the implementation of Project Design Feature TRAF-PDF-1, which would require construction staging and construction worker parking associated with the Project to be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. In addition, future driveway and building configurations, including the installation of a traffic signal on Venice Boulevard, under Alternative 4 would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 4, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 4 would be less than significant and similar to the Project.

Relationship of the Alternative to Project Objectives

Alternative 4 includes the same building density and sf proposed under the Project with the addition of the installation of a traffic signal at the intersection of Venice Boulevard and the proposed driveway along Venice Boulevard. As Alternative 4 would be substantially similar to the Project, all Project Objectives would be met to the same degree as the Project.

5.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project alternatives are summarized in **Table 5-2**, *Comparison of the Impacts of the Project and Alternatives*, below. In addition, **Table 5-3**, *Ability of Alternatives to Meet Project Objectives*, is also provided to show a comparison of the ability of the analyzed alternatives to meet Project Objectives.

TABLE 5-2
COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES

Impact	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Aesthetics					
AES-1: Substantial adverse effect on a scenic vista	No Impact	No Impact (Less)	No Impact (Similar)	No Impact (Similar)	No Impact (Similar)
AES-2: Substantially damage a scenic resource	No Impact	No Impact (Less)	No Impact (Similar)	No Impact (Similar)	No Impact (Similar)
AES-3: Conflict with applicable zoning and other regulations governing scenic quality	No Impact	No Impact (Less)	No Impact (Similar)	No Impact (Similar)	No Impact (Similar)
AES-4: Substantial light or glare	No Impact	No Impact (Less)	No Impact (Similar)	No Impact (Less)	No Impact (Similar)
Air Quality					
AIR-1a: Conflict with Air Quality Management Plan during construction	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
AIR-1b: Conflict with Air Quality Management Plan during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
AIR-2a: Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area during construction	Significant and Unavoidable	No Impact (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Similar)
AIR-2b: Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
AIR-3a: Sensitive Receptors Exposure to Non-Attainment Criteria Pollutant Concentrations during construction	Less than Significant	No Impact (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
AIR-3b: Sensitive Receptors Exposure to Non-Attainment Criteria Pollutant Concentrations during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
AIR-3c: Carbon Monoxide Hotspots	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
AIR-3d: Toxic Air Contaminants during construction	Less than Significant	No Impact (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
AIR-3e: Toxic Air Contaminants during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Cultural Resources					
CUL-1: Historic Resources	Less than Significant	No Impact (Similar)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
CUL-2: Archaeological Resources	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
Energy					
ENE-1a: Cause Wasteful, Inefficient, or Unnecessary Consumption of Energy during construction	Less than Significant	No Impact (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
ENE-1b: Cause Wasteful, Inefficient, or Unnecessary Consumption of Energy during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
ENE-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Geology and Soils					
GEO-1a: Directly or indirectly cause potential substantial adverse effects involving: fault rupture	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-1b: Directly or indirectly cause potential substantial adverse effects involving: strong seismic ground shaking	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-1c: Directly or indirectly cause potential substantial adverse effects involving: seismic-related ground failure	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-2: Substantial soil erosion or loss of topsoil	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-3: Unstable geologic unit	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-4: Expansive soils	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-6: Paleontological resources	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)

Impact	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Greenhouse Gas Emissions					
GHG-1: Generate Emissions	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Less)	Less than Significant (Similar)
GHG-2: Conflict with Applicable Plans	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Hazards and Hazardous Materials					
HAZ-1: Routine transport, use, or disposal of hazardous materials	Less than Significant with Mitigation	Less than Significant (Less)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
HAZ-2: Accidental Release of Hazardous Materials into the Environment	Less than Significant with Mitigation	Less than Significant (Less)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
HAZ-3: Emitting hazards within on-quarter miles of an existing or proposed school	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-4: Hazardous Materials Database Listings	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-6: Adopted Emergency Response Plan	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Hydrology and Water Quality					
H/WQ-1: Violate water quality standards during construction	Less than Significant with Mitigation	Less than Significant (Greater)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
H/WQ-2: Decrease groundwater supplies	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
H/WQ-3: Substantially alter existing drainage pattern	Less than Significant	No Impact (Greater)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
H/WQ-5: Conflict or obstruct a water quality control plan or sustainable groundwater management plan	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
H/WQ-6: Relocation or construction of new or expanded stormwater drainage facilities	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Land Use and Planning					
LU-2: Create a Significant Impact due to a Conflict with Plans, Policies, or Regulations	Less than Significant	No Impact (Less)	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Noise					
NOI-1a: Noise Levels in Excess of Established Standards during construction	Significant and Unavoidable	No Impact (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Greater)
NOI-1b: Noise Levels in Excess of Established Standards during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
NOI-2: Excessive Groundborne Vibration or Groundborne Noise Levels during construction	Less than Significant (Structural) Significant and Unavoidable (Human Annoyance)	No Impact (Less)	Less than Significant (Structural) Significant and Unavoidable (Human Annoyance) (Less)	Less than Significant (Structural) Significant and Unavoidable (Human Annoyance) (Less)	Less than Significant (Structural) Significant and Unavoidable (Human Annoyance) (Similar)
NOI-2: Excessive Groundborne Vibration or Groundborne Noise Levels during operation	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Public Services – Fire Protection					
FIRE-1a: Result in Adverse Impacts Associated with the Provision of New or Physically Altered Fire Protection Facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
Public Services – Police Protection					
POL-1a: Result in Adverse Impacts Associated with the Provision of New or Physically Altered Police Protection Facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
Transportation					
TRAF-1: Conflict with Plan, Ordinance, or Policy Addressing Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
TRAF-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
TRAF-3: Increase Hazards due to a Geometric Design Feature or Incompatible Uses	Less than Significant	No Impact (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Less)
TRAF-4: Inadequate Emergency Access	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
Tribal Cultural Resources					
TCR-1: Change in the significance of a Tribal Cultural Resource	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
Utilities and Service Systems					
WS-1: Relocation or construction of new water facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
WS-2: Sufficient water supplies	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
WW-1: Relocation or construction of new wastewater treatment facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
WW-2: Adequate wastewater treatment capacity	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
SW-1: Generate solid waste in excess of State or local standards	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Similar)
INF-1: Relocation or construction of new electric power, natural gas, or telecommunication facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)

SOURCE: ESA, 2022.

TABLE 5-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning-Compliant Alternative	Alternative 3: Reduced Project Alternative	Alternative 4: Alternate Project Access Alternative
1. Develop an integrated Project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
2. Support City of Culver City, City of Los Angeles, and regional goals and polices to reduce vehicle miles traveled and associated greenhouse gas (GHG) and regional pollutant emissions by increasing employee density in proximity to transit, including the Metro "E" Line and numerous bus routes.	Fully Meets Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective
3. Provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy.	Fully Meets Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective
4. Strengthen the area's economic vitality by attracting and retaining highly skilled workers.	Fully Meets Objective	Does not Meet Objective	Meets Objective (to a lesser extent than the Project)	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective
5. Generate additional municipal revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.	Fully Meets Objective	Does not Meet Objective	Meets Objective (to a lesser extent than the Project)	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective
6. Provide an amount of parking that satisfies anticipated demand on the Project Site but does not undercut transit usage	Fully Meets Objective	Does not Meet Objective	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective	Fully Meets Objective
7. Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.	Fully Meets Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)	Fully Meets Objective	Fully Meets Objective
8. Provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
9. Support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective

SOURCE: ESA, 2022.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions, with the exception of the vacant areas on the Project Site, which are assumed to continue to be vacant. Alternative 1 would not meet most of the Project Objectives, would only partially meet three of the Project Objectives, and would avoid all of the Project's potentially significant impacts and would have reduced impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 2, the Zoning-Compliant Alternative, and Alternative 3, the Reduced Project Alternative, would both involve less development compared to the Project, and both alternatives would reduce, but not eliminate, the Project's significant unavoidable impacts related to Project-level and cumulative regional air quality emissions, Project-level and cumulative on-site construction noise, cumulative off-site construction noise (construction vehicles), and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles) impacts. In addition, Alternative 4, Alternate Project Access, proposes a similar development as the Project and, as such, would results in similar significant and unavoidable impacts. However, Alternative 3 is considered the environmentally superior alternative, as it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 2 as it would require less building construction and shortened building height for Building 2.

However, because Alternative 3 would develop a smaller office development, the number of employees would be reduced. As such, Alternative 3 would meet to a lesser extent than the Project the Project Objectives related to increasing employee density in proximity to transit; providing a high-quality office space to attract and retain desirable innovative companies; strengthening the area's economic vitality by attracting and retaining highly skilled workers; and increased sales taxes from increased economic activity from the additional jobs.

CHAPTER 6
Other CEQA Considerations

6.1 Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.2, *Air Quality*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative air quality impacts during construction of the Project and as evaluated in Section 4.10, *Noise*, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative on-site construction noise, cumulative off-site construction noise (construction vehicles), and Project-level and cumulative off-site construction (human annoyance) vibration (construction vehicles) impacts.

Construction Air Quality - Regional NO_X Emissions (Project-Level and Cumulative): As analyzed in Section 4.2, *Air Quality*, of this Draft EIR, during 2025, there will be a period of time when Building 1 is operational and Building 2 is still under construction. The Project's overlapping construction and emissions of NO_X in 2025 would exceed the SCAQMD thresholds of significance. Emissions of other criteria pollutants would be below SCAQMD thresholds. The NO_X emissions result primarily from heavy-duty trucks during overlapping construction of Building 2 while Building 1 is operational. Therefore, the Project's temporary impact related to overlapping construction and operational regional NO_X emissions would be potentially significant. Mitigation Measure AQ-MM-1 would be required to reduce overlapping construction-related NO_X emissions that would be concurrent with the Building 1 regional operational emissions. In addition, there are no feasible mitigation measures to reduce construction emissions further or reduce operational emissions of NO_X. With implementation of feasible mitigation, regional NO_X emissions from overlapping construction and operations would remain above the regional operational significance threshold for NO_X. The use of SCAQMD's operational significance threshold for NO_X provides a conservative analysis of potential regional NO_X emissions impacts as it is lower than the construction significance threshold for NO_X. Therefore, based on this conservative methodology, short-term and temporary impacts related to regional NO_X emissions occurring during this overlapping operational and construction phase would be significant and unavoidable after implementation of feasible mitigation measures. There would also be a cumulatively considerable net increase of NO_X emissions, which would result in a significant and unavoidable cumulative impact.

On-Site Construction Equipment Noise (Project-level and Cumulative): Off-site receptor locations at R1, R2, and R3 have more than two-story buildings represented, and upper floor receivers/units that have outdoor living areas on the side facing the Project construction areas would be exposed to construction noise from the Project Site. Mitigation Measure NOI-MM-1 would provide at least a 10 dBA noise reduction at ground-floor sensitive receptors R1 and R2, and 5 dBA noise reduction at sensitive receptors R3 and R4. Mitigation Measure NOI-MM-2 requires that muffler systems provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system. With implementation of mitigation measures maximum construction noise levels would not increase ambient noise levels at any of the ground-floor noise-sensitive receptor locations above the applicable thresholds of significance. With standard building exterior-to-interior noise attenuation provided by modern building construction, interior noise levels at these off-site receivers would not result in significant impacts. However, with respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units, due to technical limitations including barrier foundation needs and wind load capacities. Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor residential units at receptor locations R1, R2, and R3 to the west of the Project Site, construction noise would remain significant and unavoidable.

Cumulative construction noise impacts associated with on-site construction equipment could be significant in the event that construction activities as part of Related Project Nos. 5, 8, 9, 11, 14, and 15 occur within 1,000 feet of the Project Site. Each of these related projects are required to comply with the noise standards and ordinances of the City of Culver City and City of Los Angeles, as applicable. Exact construction schedules for these related projects are not known. It is not possible to predict whether construction of these related projects would overlap with construction of the Project. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as the Project. Because the Project would result in potentially significant construction noise impacts prior to mitigation measures, cumulative on-site noise from the Project and related projects could result in potentially significant cumulative construction noise impacts at similar off-site receptors and receivers between the Project Site and the nearest related project sites. Mitigation Measures NOI-MM-1 and NOI-MM-2 would serve to reduce cumulative on-site construction noise impacts. With respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units at receptor locations R1, R2 and R3, due to technical limitations including barrier foundation needs and wind load capacities.

Off-Site Construction Noise – Mobile Sources (Cumulative): With regard to off-site construction noise, construction traffic from related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. Given that it is possible that the Project and related projects could together contribute to cumulative off-site construction traffic noise levels on the same roadways at the same time and could exceed a significance threshold with combined cumulative traffic levels, cumulative off-site

construction traffic noise impacts would be potentially significant. The installation of sound barriers would be inappropriate for residential land uses that face the roadway as it would be impractical and create aesthetic and access concerns. Thus, there are no feasible mitigation measures that could be implemented to reduce the temporary cumulative off-site construction traffic noise impacts. Therefore, the Project's contribution to cumulative off-site construction noise would be cumulatively considerable and would represent a significant and unavoidable impact.

Off-Site Construction Vibration – Human Annoyance (Project-level and Cumulative): It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential, hotel and theater uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 25 feet of the sensitive use (residential and hotel use) along Venice Boulevard, Washington Boulevard, S. Robertson Boulevard, and National Boulevard. Temporary vibration levels could reach approximately 72 VdB periodically as heavy-duty construction trucks, including haul trucks and concrete trucks, pass sensitive receptors along the anticipated haul route(s). Therefore, the residential uses along National Boulevard, Washington Boulevard, S. Robertson Boulevard, and Venice Boulevard (between the Project Site and I-10), would be exposed to ground-borne vibration up to 72 VdB, which would be at the 72-VdB significance criteria from the heavy-duty construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. However, traffic travelling on public roadways, including haul trucks on the haul routes, is beyond the control of the Project. In addition, Project-related heavy-duty construction trucks would be restricted to the designated haul routes (Venice Boulevard, Washington Boulevard, National Boulevard, and La Cienega Boulevard) and avoid other neighborhood streets, so that this potential impact is minimized. Potential vibration impacts associated with heavy-duty construction trucks traveling on public roadways would remain significant and unavoidable.

Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. Construction of the Project, both on-site and off-site, would not result in significant vibration impacts related to structural damage. However, the Project would result in vibration impacts related to human annoyance. As such, should construction traffic of the Project and related projects overlap, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. Therefore, cumulative off-site construction vibration impacts would be potentially significant. However, no feasible mitigation measures are available for off-site construction truck route vibration impacts. Thus, the Project's contribution to cumulative off-site construction vibration would be cumulatively considerable and would represent a significant and unavoidable impact.

6.2 Reasons Why the Project is Being Proposed Notwithstanding Significant Unavoidable Impacts

In addition to identification of the Project's significant and unavoidable impacts, CEQA Guidelines Section 15126.2(c) also requires a description of the reasons why a project is being proposed, notwithstanding significant and unavoidable impacts associated with the project. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the Project's basic objectives, both of which are identified in Chapter 2, *Project Description*, of this Draft EIR. As identified therein, the underlying purpose of the Project is to provide a creative office campus for innovative entertainment, media, and/or technology companies.

As described further below, this Project is being proposed, notwithstanding its significant and unavoidable impacts, because: (1) the Project would achieve objectives related to development of a creative office building consistent with land use regulations and design parameters; (2) support City and regional goals and polices to reduce vehicle miles traveled (VMT) and associated greenhouse gas and regional pollutant emissions by increasing employee density in proximity to transit, including the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and numerous bus routes; (3) provide high quality office space to attract and retain desirable innovative entertainment, media, and/or technology companies, including a secure site that fulfills such companies' needs for security and privacy; (4) strengthen the area's economic vitality by attracting and retaining highly skilled workers; (5) generate additional revenues in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs; (6) provide an amount of parking that satisfies anticipated demand on the Project Site but does not undercut transit usage; (7) complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities; (8) provide a pedestrian-oriented design that enhances pedestrian circulation and experiences around the Project Site; and (9) support environmental sustainability and reduce energy consumption and water demand through sustainable building design and building features.

The Project's significant and unavoidable air quality impacts during overlapping construction and operation of the Project, Project-level and cumulative on-site and cumulative off-site construction noise impacts, and Project-level and cumulative off-site construction vibration impacts would be limited and temporary in nature and are typical of impacts occurring at development sites in urban areas, particularly within infill locations in proximity to existing development and active related projects. These impacts would occur only during construction and only on limited occasions when the maximum intensity of construction activity is occurring. The associated project design features and mitigation measures would reduce construction-related impacts in these regards to the maximum extent feasible.

The Project design is intended to redevelop the Project Site to provide quality office space within proximity to transit. The Project would contribute to a land use pattern that, broadly, would reduce VMT due to its proximity to existing major transportation lines and the Metro "E" Line Culver City Station, located less than 600 feet from the Project Site. Through the densification of development within a Transit Priority Area (TPA), the Project would support a land use pattern that would reduce reliance on private automobiles, VMT, and the consumption of non-renewable resources when

considered in a larger context. The Project Site is located within a City of Los Angeles-designated TPA and SCAG-designated High Quality Transit Area (HQTA), and an area identified as preferred for high-density development to reduce VMT and related consumption of renewable resources, among other goals. In addition, the Project would incorporate sustainable and green building design and construction that exceed the applicable requirements of the City of Los Angeles Green Building Code and California Green Building Standards (CALGreen) Code through the implementation of LEED Gold equivalent standards.

Notwithstanding significant and unavoidable Project-level air quality impacts during concurrent construction and operation of the Project, Project-level and cumulative on-site and cumulative off-site construction noise impacts, and Project-level and cumulative off-site construction vibration impacts, the Project would support the development of the Project Site with a well-designed creative office project within a TPA. The Project would also contribute to the economy of the local area and the region through the creation of new jobs for both temporary construction activities and long-term operations.

6.3 Significant Irreversible Environmental Changes

CEQA Guidelines Sections 15126(c) and 15126.2(d) indicate that, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(d) indicates:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials; and (2) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation.

Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment. Project operation would continue to expend nonrenewable resources that are currently consumed within the City (i.e., electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water). Fossil fuels would represent the primary energy source

associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

The analysis of Project impacts on energy impacts in Section 4.4, *Energy*, of this Draft EIR, provides a discussion of State efforts to reduce emissions and energy consumption, which also requires concurrent reductions in the consumption of non-renewable resources. As analyzed therein, the Project would result in a less-than-significant energy impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's electricity and natural gas usage would be consistent with future usage projections for the region. Electricity generation capacity and supplies of natural gas as well as transportation fuels would be sufficient to meet the needs of the Project construction and operational activities. Construction of the Project would utilize fuel-efficient trucks and equipment consistent with federal and State regulations, such as fuel efficiency regulations in accordance with CARB's Pavley Phase I and II standards (at a minimum through the model year 2020 standards depending on the outcome of the SAFE Vehicles Rule court challenge), the anti-idling regulation in accordance with CCR, Title 13, Section 2485, and fuel requirements in accordance with CCR, Title 17, Section 93115, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. The Project would also comply with Title 24 standards and applicable CALGreen Building Code requirements.

In addition, the Project would be consistent with the State's Assembly Bill (AB) 32 GHG reduction target and would result in a less-than-significant impact with respect to consistency with applicable plans, policies, or regulations to reduce GHG emissions. The Project would not conflict with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, Culver City's Green Building Program and City of Los Angeles Green Building Code, L.A.'s Green New Deal/Sustainability pLAn 2019, and the City's Green Building Code.

Continued use of such non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. The Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

6.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

As discussed in Chapter 2, *Project Description*, of this Draft EIR, the Project would include up to 536,000 sf of new floor area, including Building 1, which would include 167,000 sf of office uses and Building 2, which would include 369,000 sf of office uses. The Project would not include any new residential development, and, thus, would not generate a direct increase in residential population. However, the Project would have the potential to generate indirect population growth in the Project vicinity as a result of the new employees generated by the Project.

During construction, the number of employees is estimated to vary on a day-to-day basis over the course of Project construction. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth inducing from a short-term employment perspective, but rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

As described in the Initial Study, provided in Appendix A of this Draft EIR, development of the Project would generate an increase of 2,400 employees. As discussed therein, 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 not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, because the Project would utilize the existing transportation and utility infrastructure to serve the Project. The Project would include office uses that would be compatible with adjacent uses and would not increase or induce residential density growth on the Project Site. The Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. It would not open inaccessible sites to new development other than existing opportunities for development that are already available.

Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts.

6.5 Potential Secondary Effects Related to Project Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) requires mitigation measures to be discussed in less detail than the significant effects of the Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. The analysis of Project impacts in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, resulted

in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. For the reasons stated below, it is concluded that the Project's mitigation measures would not result in significant secondary impacts.

6.5.1 Air Quality

Mitigation Measure AQ-MM-1 would reduce NO_X emissions associated with construction of the Project to below regulatory thresholds through meeting or exceeding the Tier 4 Final standards, idling restrictions, maintaining and operate construction equipment so as to minimize exhaust emissions, and discontinuing construction activities during an Air Quality Index (AQI) of 151 or more (unhealthy level).

These mitigation measures for air quality would implement emissions control strategies that would reduce impacts to less-than-significant levels. As these mitigation measures are control strategies for different construction equipment that the Applicant would use or install, no further impacts would occur with their implementation. Therefore, these mitigation measures for air quality would not result in significant secondary impacts on the environment.

6.5.2 Cultural Resources

Mitigation Measures CUL-MM-1 through CUL-MM-3 establish protections for archaeological resources through monitoring plans to identify such resources should they be uncovered during construction at the Project Site. These measures also include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. The actions required for monitoring and treatment of resources if they are encountered would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

6.5.3 Geology and Soils

Mitigation Measures GEO-MM-1 through GEO-MM-3 establish protections for paleontological resources through identification, treatment, and preservation of such resources should they be discovered on the Project Site. These measures include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. Similar to the mitigation of archaeological resources described above, the activities involved with monitoring, treatment, and reporting would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in secondary impacts on the environment.

6.5.4 Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 requires a Health and Safety Plan (HASP) that would address, as appropriate, safety requirements to avoid significant impacts or risks to workers or the public in the event that contaminated soils or elevated levels of subsurface vapors are encountered during

grading and excavation. Mitigation Measure HAZ-MM-2 requires a Soil and Groundwater Management Plan (SGMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity to manage contaminated materials, if encountered. These measures would reduce impacts related to potential contamination in the on-site soils to a level that is less than significant. The implementation of these mitigation measures would occur only within the Project Site and would not result in secondary environmental effects at neighboring residential properties or within the broader community.

6.5.5 Noise

Implementation of Mitigation Measure NOI-MM-1 would reduce construction noise through provision of a temporary 12-foot-tall construction fence along the northern and western boundaries of the Project Site and a temporary 6-foot-tall construction fence along the southern boundary along Washington Boulevard. The construction fence would be temporary, but would result in impacts on aesthetics, which would be secondary and also temporary in nature. Once construction is completed, the construction fence would be removed. As such, Mitigation Measure NOI-MM-1 would not result in significant secondary impacts. Implementation of Mitigation Measure NOI-MM-2 requires that construction equipment be equipped with properly operating and maintained noise shielding and muffling devices that would achieve specific reductions in noise compared to the same equipment without an installed muffler system. Mitigation Measure NOI-MM-2 would be a control strategy for construction equipment that the Applicant would use or install, thus no further impacts would occur with this implementation. Therefore, these mitigation measures for construction noise would not result in secondary impacts on the environment.

6.5.6 Tribal Cultural Resources

Mitigation Measure TCR-MM-1 requires retention of a Native American Monitor, the provisions of a Tribal Cultural Resources Sensitivity Training session, and Native American monitoring. Mitigation Measure TCR-MM-2 requires completion of daily monitoring logs and Mitigation Measure TCR-MM-3 provides for provisions in the event of a discovery of potential tribal cultural resources. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. The actions required for monitoring and treatment of resources if they are encountered would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

6.6 Impacts Found Not to be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. Pursuant to CEQA Guidelines Section 15120, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. The City of Culver City determined that the Project would result in less than significant or no impacts related to agriculture and forestry resources; air quality

as it relates to other emissions (such as those leading to odors) adversely affecting a substantial number of people; biological resources; cultural resources as it relates to human remains; geology and soils as it relates to landslides, soils supporting septic tanks; hazards and hazardous materials as it relates to an airport land use plan and wildland fires; hydrology and water quality as it relates to inundation; land use and planning as it relates to dividing an established community; mineral resources; noise as it relates to airstrips or airport proximity; population and housing; public services as it relates to schools, parks, and other public facilities; recreation; utilities and services systems as it relates to telecommunication facilities; and wildfire. For further discussion of these issues and a more detailed evaluation of potential impacts, refer to the Project Initial Study, provided in Appendix A of this Draft EIR.

CHAPTER 7
References

4.1 Aesthetics

Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego, 139 Cal.App. 4th 249, 279 (2006).

California Department of Transportation (CA, California State Scenic Highway System Map – ArcGIS Online, https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 6, 2022.

City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit A.3-1, 2006.

City of Los Angeles Department of City Planning, General Plan Conservation Element. Originally adopted September 26, 2001.

City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001.

City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 5, originally adopted December 11, 1996 and readopted August 8, 2001.

City of Los Angeles Department of City Planning, General Plan Framework, Executive Summary, originally adopted December 11, 1996 and readopted August 8, 2001.

4.2 Air Quality

42 United States Code Section 7401 et seq. (1970).

SCAG 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction.

California Air Resources Board (CARB), Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed on July 8, 2022.

CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed July 8, 2022.

CARB, Visibility-Reducing Particles & Health. Last reviewed July 8, 2022.

City of Culver City, Culver City General Plan, Circulation Element, 1995.

City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

City of Los Angeles, Plan for a Healthy Los Angeles, 2021.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, Appendix D, July 2022.

San Joaquin Valley Air Pollution Control District (SJVAPCD), Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, Filed April 13, 2015.

SCAG, Final 2016 RTP/SCS, 2016, https://scag.ca.gov/resources-prior-plans. Accessed July 8, 2022.

SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.

SCAQMD, Air Quality Analysis Guidance, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#. Accessed July 8, 2022.

SCAQMD, Air Quality Significance Thresholds, April 2019.

SCAQMD, Amicus Brief in Support of Neither Party, Sierra Club v. County of Fresno, April 6, 2015.

SCAQMD, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.

SCAQMD, Cumulative Impacts White Paper, Appendix D.

SCAQMD, Final 2016 AQMP, March 2017. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed July 8, 2022.

SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).

SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

SCAQMD, Localized Significance Thresholds. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed July 8, 2022.

SCAQMD, Map of Jurisdiction, 1999.

SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.

SJVAPCD, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan, March 2017.

SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art(2.0 Standard Approaches, http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017.

USEPA, Clean Air Act, 1963.

USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed July 8, 2022.

4.3 Cultural Resources

36 Code of Federal Regulations (CFR) 60.

A. L. Kroeber, Handbook of the Indians of California, Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

Byrd, Brian F., and Mark L. Raab, Prehistory of the Southern Bight: Models for a New Millennium. In California Prehistory: Colonization, Culture, and Complexity, 2007. edited by Terry L. Jones and Kathryn A. Klar, pp 215–227.

California Public Resources Code, Section 5024.1[b].

California Public Resources Code Section 21083.1(a).

California Public Resources Code, Section 5024.1[a].

Carole Cosgrove Terry, PhD, Frederick William Dohrmann (1842–1914), Immigrant Entrepreneurship, N.D, https://www.immigrantentrepreneurship.org/entries/frederick-william-dohrmann/. Accessed July 12, 2022.

CEQA Guidelines, Section 15064.5(b)(1).

CEQA Guidelines, Section 15064.5(c)(4).

CEQA Guidelines, Section 15064.5(b)(3).

Cheviot Hills History, N.D, The Spanish and Mexican Ranchos, https://www.cheviothillshistory.org/spanish-mexican-ranchos. Accessed July 12, 2022.

City of Culver City, Culver City Municipal Code, Chapter 15.05 Historic Preservation Program.

City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.

City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

Culver City Historical Society, N.D, Culver City Timeline: A Work in Progress, https://www.culvercityhistoricalsociety.org/about/culver-city-timeline/. Accessed July 11, 2022.

Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

Environmental Science Associates (ESA), (in progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California, 2022. Report on file with ESA, Irvine, CA.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angeles, CA 90017, 2018. ESA, Archaeological and Paleontological Monitoring Results for the Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles, California, 2018. Report on file with the CHRIS-SCCIC, Fullerton, CA.

Evening Vanguard, Fire Destroys Zucca's Today, February 20, 1950.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

Los Angeles County Department of Public Works, Map TR0022-044B, Tract No. 1778.

Los Angeles Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, 3-107.

Lowell J. Bean and Charles R. Smith, "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538–549.

McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, 1996.

Nancy Hadley, Frederick H. Meyer (1876–1961), American Institute of Architects Historical Directory, December 18, 2018, https://aiahistoricaldirectory.atlassian.net/wiki/spaces/AHDAA/pages/35728413/ahd1030254. Accessed July 12, 2022; Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

San Francisco Examiner, Broadway-Hale Sells Unit for $10 Million, November 2, 1961.

United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997.

United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.

University of California Berkeley: Environmental Design Archives, N.D, Frederick H. Meyer Collection, 1904–1962, finding aid and biography via Online Archive of California, https://oac.cdlib.org/findaid/ark:/13030/tf809nb36t/admin/. Accessed July 12, 2022.

Wallace, William J., A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214–230, 1955.

4.4 Energy

BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

California Air Pollution Control Officers Association, California Emissions Estimator Model, 2021, http://caleemod.com/. Accessed July 11, 2022.

CARB, 2017 Scoping Plan, November 2017.

CARB, CalEEMod User's Guide, Appendix E, Section 5, September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

CARB, Clean Car Standards – Pavley, Assembly Bill 1493. Last reviewed January 11, 2017, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley. Accessed July 11, 2022.

California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, 2018.

California Energy Commission (CEC), Annual Power Content Labels for 2020, 2021.

CEC, 2019 Building Energy Efficiency Standards, 2019.

CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.

CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010–2020, https://www.energy.ca.gov/media/3874. Accessed July 11, 2022.

CEC, Tracking Progress – Energy Efficiency. Last updated September 2018.

California Gas and Electric Utilities, 2020 California Gas Report, 2020.

California Legislative Information, Senate Bill 100, California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases, Approved by Governor on September 10, 2018, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed July 11, 2022.

California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018.

California Public Utilities Commission, RPS Program Overview, 2018.

CEC, 2019 Integrated Energy Policy Report, February 2020, p. 228, https://efiling.energy.ca.gov/getdocument.aspx?tn=232922. Accessed July 11, 2022.

CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 11, 2022.

CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 11, 2022.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Circulation Element, 1995, p. C-8.

City of Los Angeles, Sustainable City pLAn, 2015.

City of Los Angeles, VMT Calculator.

City of Los Angeles. LA's Green New Deal, 2019.

Edison International and Southern California Edison (SCE), 2020 Annual Report, 2021.

Edison International and SCE, 2021 Annual Report, 2022, p. 2, https://www.edison.com/home/investors/financial-reports-information/annual-reports.html. Accessed July 11, 2022.

KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, Exhibits 4 and 11.

Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

Los Angeles Department of Water and Power (LADWP), 2017 Final Power Strategic Long-Term Resource Plan, December 2017.

LADWP, Briefing Book 2020-2021, p. 59.

LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 11, 2022.

National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

Next 10 and Pacific Institute, The Future of California's Water-Energy-Climate Nexus, Table 4.

SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 11, 2022.

Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020.

SCE, Who We Are, April 2022.

U. S. Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.

U.S. Energy Information Administration, California Energy Profile Overview, 2021, https://www.eia.gov/state/?sid=CA#tabs-1. Accessed July 11, 2022.

U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? Last updated April 9, 2018, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed July 11, 2022.

United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

4.5 Geology and Soils

California Building Code, 2019 Part 2, Volume 1, Chapter 18, Soils and Foundations, Section 1803, Geotechnical Investigations.

City of Culver City, Culver City General Plan – Public Safety Element, July 1975.

City of Culver City, Culver City General Plan – Seismic Safety Element, May 1974, updated January 1977.

City of Los Angeles General Plan, Conservation Element, pp. II-6 to II-9.

Department of General Services, Building Standards Commission, California Building Standards Code, https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo/. Accessed January 11, 2022.

Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, Crossings Campus, City of Culver City and City of Los Angeles, California, Paleontological Resources Assessment Report, July 2022.

ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angele, CA 90017, 2018.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Los Angeles, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

Society of Vertebrate Paleontology (SVP), Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

SWCA Environmental Consultants, Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California. Prepared for: Greystar, 2615 Pacific Coast Highway, Suite 208, Hermosa Beach, CA 90254. Prepared by: SWCA Environmental consultants, 150 South Arroyo Parkway, Second Floor, Pasadena, CA 91105, 2016.

United States Environmental Protection Agency (USEPA), Clean Water Act, Section 402: National Pollutant Discharge Elimination System, https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system. Accessed January 11, 2022.

USGS, 2022, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed July 12, 2022.

ZIMAS, website check for Culver City methane zones, http://zimas.lacity.org/. Accessed July 12, 2022.

4.6 Greenhouse Gas Emissions

14 California Code of Regulations Section 15064.4(b).

84 FR 51310.

Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction.

California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 39.

California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.

California Code of Regulations (CCR) 17, Section 95800 to 96023.

California Department of Finance, E-6 Population Estimates and Components of Change by County, December 2021, https://dof.ca.gov/forecasting/demographics/estimates/estimates-e6-2010-2021/. Accessed July 14, 2022.

California Department of Water Resources, Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006.

CEC, 2019 Building Energy Efficiency Standards.

California Environmental Protection Agency (CalEPA), Climate Action Team (CAT), Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

California Natural Resources Agency (CNRA), CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

California Natural Resources Agency, California Climate Adaptation Strategy, https://resources.ca.gov/Initiatives/Building-Climate-Resilience/2021-State-Adaptation-Strategy-Update. Accessed July 12, 2022.

CARB, 2014 Scoping Plan, May 2014.

CARB, 2017 Scoping Plan, Appendix G, November 2017.

CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed July 12, 2022.

CARB, California's Advanced Clean Cars Midterm Review, pp. ES-17, C-9.

CARB, CARB amends Low-Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed July 12, 2022.

CARB, Climate Change Scoping Plan, December 2008.

CARB, First Update to the AB 32 Scoping Plan, May 2014.

CARB, Low-Carbon Fuel Standard – About, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about. Accessed July 12, 2022.

CARB, OFFROAD Modeling Change Technical Memo, 2003.

CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets (2018).

CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

CARB, Sustainable Communities & Climate Protection Program – About, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about. Accessed July 12, 2022.

CARB, California Greenhouse Gas Emissions for 2000-2019, 2021. Accessed July 12, 2022.

CCR 17, Section 95100-95158.

CCR 17, Section 95811(b).

CCR 17, Section 95811, 95812(d).

CCR 17, Section 95811, 95812.

CCR 17, Section 95812.

CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

CEC, 2022 Building Energy Efficiency Standards Summary.

CEC, Scenarios of Climate Change in California: An Overview, February 2006.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Culver City Bicycle & Pedestrian Master Plan (BPMP), adopted by City Council, November 8, 2010.

City of Culver City, Municipal Code Chapter 15.02.1005, Solar Photovoltaic Systems.

City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

City of Los Angeles, Air Quality Element, June 1991, pp. IV-1 to IV-4.

City of Los Angeles, Department of Public Works, LA Sanitation, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188. Accessed July 12, 2022.

City of Los Angeles, Green New Deal/Sustainable City pLAn, 2019.

City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.

City of Los Angeles, Sustainable City pLAn, April 2015.

CNRA, CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

EKI, Water Supply Assessment for Crossings Campus Building 1, March 31, 2022.

Energy and Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

E3, Deep Decarbonization in a High Renewables Future, Updated Results from the California PATHWAYS Model, June 2018.

Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

IPPC, Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

IPCC, Intergovernmental Panel on Climate Change, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, p. 5, http://ipcc.ch/report/ar5/syr/. Accessed July 12, 2022.

IPCC, Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, p. 20.

IPCC, Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research (OPR) to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

National Research Council, Advancing the Science of Climate Change, 2010.

OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review.

P. Friedlingstein et al.: Global Carbon Budget 2020, 2020.

Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

Parmesan, C. and Galbraith, H., Observed Ecological Impacts of Climate Change in North America. Arlington, VA: Pew. Cent. Glob. Clim. Change, 2004.

Parmesan, C., Ecological and Evolutionary Response to Recent Climate Change, first published on August 24, 2006.

Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.

SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), May 2020.

SCAG, 2020-2045 RTP/SCS Public Health Technical Report, May 2020, p. 53.

SCAG, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, May 2020.

SCAG, 2020-2045 RTP/SCS, May 2020.

SCAG, The State of the Region—Measuring Regional Progress, December 2006, p. 121.

SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/0812ag.html. Accessed July 12, 2022.

SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed July 12, 2022.

14 California Code of Regulations Sections 15064.7; 15064.4.

CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16

San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025, June 25, 2014

SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014)

SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014)

SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)

SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed July 12, 2022.

Southern California Association of Governments (SCAG), Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, May 7, 2020, p. 5.

State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact. Accessed July 12, 2022.

State of California, SB No. 375, September 30, 2008.

The Cal-Adapt website: http://cal-adapt.org. Accessed July 12, 2022.

U.S. Environmental Protection Agency (USEPA), Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.

USEPA, Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/greenhouse-gases. Accessed July 12, 2022.

USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed July 12, 2022.

USEPA, Mixed-Use Trip Generation Model. Accessed July 12, 20221. https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model.

USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

LADWP, Water Supply Assessment - for the Crossings Campus Project, February 24, 2022.

4.7 Hazards and Hazardous Materials

California Health & Safety Code, Division 20, Chapter 6.95, Article 1; California Code of Regulations, Title 19, Sections 2620–2732; California Code of Regulations, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.

City of Culver City Fire Department, CUPA/Hazardous Materials Disclosure Reporting Program, Business Reporting Forms and Emergency Plan Packet, July 2005.

Code of Federal Regulations (CFR), Title 49, Parts 100–180, Transportation, revised as of October 1, 2010.

County of Los Angeles Department of Public Works, Disaster Routes, Los Angeles County Operational Area, https://dpw.lacounty.gov/dsg/DisasterRoutes/. Accessed July 12, 2022.

EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021.

Federal Emergency Management Act (FEMA), History of FEMA, https://www.fema.gov/about/history. Accessed July 12, 2022.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

The CalARP program encompasses both the federal "Risk Management Program," established in the CFR, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5.

United States Department of Transportation (USDOT), Federal Hazmat Law, September 2021.

United States Environmental Protection Agency (USEPA), Emergency Planning and Community Right-to-Know Act Fact Sheet, Fall 2020.

4.8 Hydrology and Water Quality

Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, January 2016.

California State Water Resources Control Board, State Board Resolution No. 68-16, 1968.

California Water Code, Division 7, Water Quality, Section 13000 et seq.

City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

Culver City Public Works Department, Culver City Stormwater Quality Master Plan, May 2021.

Dudek, Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin, January 2022.

EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022.

Los Angeles County Department of Public Works, Hydrology Manual, 2006.

Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2018.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2013.

Los Angeles Regional Water Quality Control Board, Order No. R4-2021-0105, NPDES Permit No. CAS004004, Regional Phase I MS4 NPDES Permit, Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit For Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties. September 11, 2021.

The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, 42 U.S.C. 4001 et. seq.

United States Environmental Protection Agency (USEPA), Clean Water Act, 2002.

USEPA, Clean Water Act, 2016.

USEPA, Water Quality Standards Handbook - Chapter 4: Antidegradation, 2010.

USEPA, Water Quality Standards, Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California, 2001.

4.9 Land Use and Planning

California Government Code, Title 7, Division 1, Chapter 3, Article 5. Authority for and Scope of General Plans, Sections 65302 – 65303.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Culver City Urban Forest Master Plan, 2015.

City of Culver City, Exposition Light Rail Transit and Station Design for Development, June 6, 2005, p. 2.

City of Culver City, General Plan Open Space Element, adopted 1996, amended through 2004, https://www.culvercity.org/home/showpublisheddocument?id=796. Accessed January 17, 2022.

City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001, p. 5-1, et. seq.

City of Los Angeles Department of City Planning, General Plan Overview, https://planning.lacity.org/plans-policies/general-plan-overview. Accessed July 13, 2022.

City of Los Angeles, Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, p. 1-12

City of Los Angeles, Los Angeles Housing Element 2021-2029, p. 242.

Los Angeles Metropolitan Transit Authority (Metro), Active Transportation Strategic Plan (ATSP), in development, https://www.metro.net/projects/active-transportation-strategic-plan-atsp/. Accessed July 13, 2022.

4.10 Noise

American Journal of Audiology (AJA), Average Speech Levels and Spectra in Various Speaking/Listening Conditions, A Summary of the Pearson, Bennett, & Fidell (1977) Report, Vol. 7 21-25. doi:10.1044/1059-0889(1998/012), October 1998, https://aja.pubs.asha.org/article.aspx?articleid=1773811. Accessed July 13, 2022.

California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

City of Los Angeles, Municipal Code, Chapter XI, Article I, Section 111.02-(b), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193819. Accessed July 13, 2022.

City of Los Angeles, Noise Element of the Los Angeles City General Plan, adopted February 3, 1999, pp. 1.1-2.4.

Federal Highway Administration (FHWA), Roadway Construction Noise Model User's Guide, 2006, p. 3.

Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, Prepared by John A. Volpe National Transportation Systems Center, Section 7.1.3, September 2018.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022.

FHWA, Special Report – Measurement, Prediction, and Mitigation, Chapter 4 Mitigation, last updated June 28, 2017, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed July 13, 2022.

State of California Governor's Office of Planning and Research (OPR), General Plan Guidelines, 2003.

United States Department of Labor, Occupational Safety and Health (OSH) Act of 1970, https://www.osha.gov/laws-regs/oshact/completeoshact. Accessed July 13, 2022.

United States Environmental Protection Agency (EPA), EPA Identifies Noise Levels Affecting Health and Welfare, EPA Press Release – April 2, 1974, https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html#:~:text=The%20document%20identifies%20a%2024,preventing%20activity%20interference%20and%20annoyance, last updated on September 14, 2016.

World Health Organization, Environmental Noise Guidelines for the European Region, edited by Dr. Zsuzsanna Jakab, WHO Regional Director for Europe, 2018.

4.11.1 Public Services – Fire Protection

CAL FIRE, California Fire Hazard Severity Zone Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed March 18, 2022.

California Building Code (CCR, Title 24, Part 2).

California Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.

City of Culver City, Culver City General Plan, Public Safety Element, adopted August 25, 1975.

City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, p. 26.

City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 843, 847.

City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 9: Infrastructure and Public Services, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.

City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report, February/March 2016.

Culver City Fire Department (CCFD), Community Risk Assessment: Standards of Cover, 2019.

Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

Los Angeles Fire Department, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission. Accessed March 18, 2022.

Los Angeles Fire Department, Find Your Station. https://www.lafd.org/fire-stations/station-results. Accessed March 21, 2022.

Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report, February–March 2016.

Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

Los Angeles Fire Department, South Bureau, https://www.lafd.org/about/south-bureau. Accessed March 18, 2022.

Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

National Fire Protection Association (NFPA), NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition.

4.11.2 Public Services – Police Protection

Culver City Police Department (CCPD), About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD. Accessed March 30, 2022.

CCPD, Assistant Chief of Police Jason Sims, correspondence dated February 14, 2022.

CCPD, December 2021 Monthly Report.

CCPD, Patrol, https://www.culvercitypd.org/Bureau-Information/Patrol-Bureau/Patrol. Accessed March 30, 2022.

County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf. Accessed March 24, 2022.

LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022.

LAPD, COMPSTAT Citywide Profile 02/27/22–03/26/22.

LAPD, COMPSTAT, https://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/. Accessed March 24, 2022.

LAPD, Operations – West Bureau. Prepared by LAPD/PRD/GIS MAPPING January 2009.

LAPD, West Los Angeles Community Police Station, https://www.lapdonline.org/lapd-contact/west-bureau/west-los-angeles-community-police-station/. Accessed March 30, 2022.

4.12 Transportation

City of Culver City, General Plan Circulation Element, amended through 1995.

City of Culver City, Resolution Adopting 2022-2026 Short Range Mobility Plan, February 28, 2022.

City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, November 2021.

City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

Federal Transit Administration (FTA), Shared Mobility Definitions, Microtransit, https://www.transit.dot.gov/regulations-and-guidance/shared-mobility-definitions, last updated February 28, 2020.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022.

Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

Los Angeles Department of Transportation (LADOT), Vision Zero Maps, https://ladotlivablestreets.org/programs/vision-zero/maps. Accessed June 30, 2022.

Public Resources Code, Section 21155.

Public Resources Code, Section 21064.3.

SCAG, High Quality Transit Areas (HQTA) 2016 – SCAG Region, February 22, 2021, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explore?location=34.018594%2C-118.361387%2C13.12. Accessed June 30, 2022.

Sequoyah Hills Homeowners Assn. V. City of Oakland (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

4.13 Tribal Cultural Resources

ESA, Crossings Campus, Culver City and City of Los Angeles, California, Archaeological Resources Assessment Report, prepared for Culver Crossings Properties LLC, July 2022.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, (In Progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

Geotechnologies, Inc. 2021. Geotechnical Engineering Investigation, Proposed Commercial Office Development, 8876 through 8888 West Venice Boulevard, and 8829 West National Boulevard, Los Angeles, California.

Gumprecht, Blake. Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

Lowell J. Bean and Charles R. Smith. “Gabrielino, in California,” edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

McCawley, William. The First Angelinos: The Gabrielino Indians of Los Angeles, (Malki Museum Press, Banning, California, 1996).

Public Resources Code, Section 21080.3.1(b) and (c).

Public Resources Code, Section 21080.3.2(b).

Public Resources Code, Section 21082.3(d)(2) and (3).

Wallace, William J. A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214-230, 1955.

4.14.1 Water Supply

California Code of Regulations, Title 20, Section 1605.3(h).

California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed April 2022.

California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.

CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022.

City of Culver City website, Water Conservation, https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Water-Conservation. Accessed July 13, 2022.

City of Culver City, Municipal Code, Chapter 5.03.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

City of Los Angeles, Sustainable City pLAn, 2015.

GSWC, Culver City Service Area 2020 Urban Water Management Plan, Chapter 6, June 15, 2021.

KPFF Consulting Engineers, Culver Crossings Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, p. 24.

Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.

Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016.

Metropolitan Water District of Southern California, Report on Integrated Water Resources Plan (IRP) Implementation, October 8, 2019.

State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, August Urban Water Production Summary, updated October 3, 2017.

State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, February Conservation Summary, updated April 4, 2017.

State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.

Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2019.

Golden State Water Company, https://www.gswater.com/southwest#:~:text=We%20currently%20serve%2054%2C994%20customers,Village%2C%20Lennox%20and%20Gardena%20Heights. Accessed July 13, 2022.

Water Surplus and Drought Management Plan, Report No. 1150, 1999.

West Basin Municipal Water District, 2020 Urban Water Management Plan, June 28, 2021, p. ES-3.

4.14.2 Wastewater

California Regional Water Quality Control Board Los Angeles Region, U.S. Environmental Protection Agency Region IX, Order R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

City of Los Angeles Bureau of Sanitation (LASAN), Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=yb7ued7kk_514&_afrLoop=1716841967525366#!. Accessed April 2022.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012.

City of Los Angeles Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

City of Los Angeles, Ordinance No. 180,822.

City of Los Angeles, Ordinance No. 181,480.

Culver City, Amalgamated Agreement Between the City of Los and the City of Culver City for the Conveyance, Treatment and Disposal of Wastewater, April 1999.

KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, pp. 15 and 16.

LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717100937245723#!. Accessed April 2022.

LASAN, Los Angeles-Glendale Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717251119351961#!. Accessed April 2022.

LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

4.14.3 Solid Waste

Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes. Accessed February 24, 2022.

California Public Resources Code Section 41821.

California Public Resources Code, Sections 41730 et seq.

CalRecycle, Jurisdiction Per Capita Disposal trends – Culver City, for reporting year 2020, December 16, 2021.

CalRecycle, Jurisdiction Per Capita Disposal Trends – Los Angeles, for reporting year 2020.

CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed February 24, 2022.

CalRecycle, Senate Bill 1374 (2002), Last updated August 24, 2018, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374. Accessed February 24, 2022.

City of Culver City website, Trash & Recycling, http://www.culvercity.org/live/home-property/residential-recycling-trash-services/trash-collections. Accessed March 14, 2022.

City of Los Angeles Bureau of Sanitation (LASAN), Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.

City of Los Angeles, Ordinance No. 181,519, March 5, 2010.

County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, October 2021.

LASAN, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl state=sc2bv57ho_78&_afrLoop=302690459702255&_afrWindowMode=0&_afrWindowId=ival6l59y#!%40%40%3F_afrWindowId%3Dival6l59y%26_afrLoop%3D302690459702255%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82. Accessed February 24, 2022.

LASAN, Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015.

LASAN, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.

LASAN, Zero Waste Progress Report, March 2013.

Los Angeles Municipal Code, City Ordinance No. 184,665.

4.14.4 Electric Power, Natural Gas, and Telecommunications Facilities

CEC, *2021 Integrated Energy Policy Report*, February 22, 2022.

California Gas and Electric Utilities, 2020 California Gas Report.

CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018, April 19, 2018.

City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 12, 2022.

City of Culver City, Information Technology, https://www.culvercity.org/City-Hall/Departments/IT. Accessed July 12, 2022.

City of Los Angeles, Sustainable City pLAn, 2015.

City of Los Angeles. LA's Green New Deal, 2019.

Edison International and SCE, 2019 Annual Report, March 2020, p. 2.

LADWP, *2017 Retail Electric Sales and Demand Forecast*, September 15, 2017, p. 14.

LADWP, 2019 Power Content Label, Version: October 2020.

LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 12, 2022.

LADWP, 2017 Final Power Strategic Long-Term Resource Plan, December 31, 2017.

SCE, About Us, 2022, https://www.sce.com/about-us/reliability. Accessed July 12, 2022.

SCE, Who We Are, https://www.sce.com/about-us/who-we-are. Accessed July 12, 2022.

Southern California Gas Company (SoCalGas), Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 12, 2022.

CHAPTER 8
List of EIR Preparers and Organizations and Persons Contacted

8.1 Lead Agency

Culver City Current Planning Division
9770 Culver Boulevard
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- Erika Ramirez, Current Planning Manager
- Jeff Anderson, Contract Planner

8.2 Project Applicant and Applicant Team

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8.3 Environmental Impact Report Preparation

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- Jay Ziff, Director – Project Director
- Mike Harden, Senior Managing Planner – Project Manager
- Jacqueline De La Rocha, Managing Planner – Deputy Project Manager
- Alan Sako, Principal Associate
- Tony Chung, Principal Associate
- Victoria Hsu, Managing Associate
- Elbert Hsiung, Senior Associate
- Tim Witwer, Senior Associate
- Monica Strauss, Vice President
- Margarita Jarabek, Ph.D., Director
- Shannon Papin, Senior Managing Associate

- Kyle Garcia, Senior Managing Associate
- Fatima Clark, Senior Associate
- Michael Burns, Senior Technical Associate
- Lorena Christman, Senior Technical Associate
- Shadde Rosenblum, Senior Technical Associate
- Denise Kaneshiro, Senior Graphics Manager
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- Gary Gick, Senior Word Processor
- Aaron Guzman, Word Processor
- Darrien Williams, Production Lead

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- James Kelly, Principal

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Civil Engineering and Hydrology

KPFF Consulting Engineers
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Los Angeles, CA 90017

- Octavio Trujillo, Project Engineer

Hazards and Hazardous Materials

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Daly City, CA 94014

- Paul B. Hoffey, Project Manager

8.4 Agencies Consulted

Culver City Fire Department
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Culver City, CA 90232

- Battalion Chief David Rindels

Culver City Police Department
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Culver City, CA 90232

- Assistant Chief of Police Jason Sims

City of Los Angeles, Planning Department
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

- Milena Zasadzien, Senior City Planner
- William Lamborn, City Planner
- Bob Babajian, Planning Assistant

Los Angeles Fire Department
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Los Angeles, CA 90012

- Fire Marshal Kristin Crowley

Los Angeles Police Department
100 West 1st Street
Los Angeles, CA 90012

- Andre Rainey, Lieutenant II

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CHAPTER 9
Standard Terms, Acronyms, and Abbreviations

AAI	All Appropriate Inquiry
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily trip
AEGL	Acute Exposure Guideline Levels
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AMI	Advanced Metering Infrastructure
ANSI	American National Standard Institute
AP	Accredited Professional
APPP	Art in Public Places Program
AQI	Air Quality Index
AQMP	Air Quality Management Plan
AR4	Fourth Assessment Report
AR5	Fifth Assessment Report
ASHRAE	American Society of Heating and Air-Conditioning Engineers
AST	regulatory program covering aboveground storage tanks
ATCM	Airborne Toxic Control Measure
ATSP	Active Transportation Strategic Plan
BACT	best available control technology
BAU	business-as-usual
BEN	Bicycle Enhanced Network
BEP	Business Emergency Plan
BERD	Built Environment Resources Database
BEV	Battery Electric Vehicle
BLS	basic life support
BMP	best management practice
BSD	Building Safety Division
BTEX	benzene, toluene, ethylbenzene, and xylenes
C_2F_6	hexafluoroethane
$C_2H_4F_2$	1,1-difluoroethane
C_2H_6	ethane
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
Cal-EMA	California Emergency Management Agency
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division

CALGreen	California Green Building Standards
CalSTA	California State Transportation Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAS	Climate Adaptation Strategy
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CF	cubic feet
CCFD	Culver City Fire Department
CCMC	Culver City Municipal Code
CCPD	Culver City Police Department
CCR	California Code of Regulations
CCTV	closed-circuit television
CDFA	California Department of Food and Agriculture
CDR	carbon dioxide removal
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERFA	Community Environmental Response Facilitation Act
CF_4	tetrafluoromethane
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_2FCF_3	1,1,1,2-tetrafluoroethane
CH_4	methane
CHC	Cultural Heritage Commission
CHF_3	trifluoromethane
CHRIS	California Historical Resources Information System
CI	compression ignition
CMP	Construction Traffic Management Plan
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COG	Council of Governments
CoIWMP	Los Angeles Countywide Integrated Waste Management Plan
COMPSTAT	Computer Statistics Unit
CPA	Clean Power Alliance
CPIO	Community Plan Implementation Overlay
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRA	Community Risk Assessment
CRT	Crisis Response Team
CTC	County Transportation Commission
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code
CY	cubic yards
dB	decibels
dBA	A-weighted decibels
DFD	Design for Development

DNL	day-night average noise level
DOE	United States Department of Energy
DOSH	Division of Occupational Safety and Health
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EIA	U.S. Energy Information Administration
EIR	environmental impact report
EISA	Energy Independence and Security Act of 2007
EMD	Los Angeles Emergency Management Department
EMD	Environmental Monitoring Division
EMMA	Emergency Managed Mutual Aid
EMS	emergency medical services
EO	Executive Order
EOC	Emergency Operation Center
EOO	Emergency Operations Organization
EPA	United States Environmental Protection Agency
EPCA	Energy Policy and Conservation Act of 1975
EPCRA	Emergency Planning and Community Right-to-Know Act
EPO	Environmental Programs and Operations
ERF	Effective Response Force
ERO	Electric Reliability Organization
ERP	Emergency Response Plan
ERT	Emergency Response Team
ESA	Environmental Science Associates
ESA	environmental site assessment
EV	electric vehicle
EVSE	electric vehicle supply equipment
EVSE	electric vehicle charging stations
EWMP	Enhanced Watershed Management Program
FAR	floor area ratio
FBI	Federal Bureau of Investigation
FCC	Federal Communications Commission
FCMP	Final Construction Management Plan
FDC	Fire Department Connection
FED	functional equivalent document
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FIRM	flood insurance rate map
FIS	flood insurance studies
FMZ	fire management zone
FPS	Fire Preemption System
FTA	Federal Transit Administration
FYE	Fiscal Year Ending
GHG	greenhouse gas
GIS	geographical information system
GSA	groundwater sustainability agency
GSP	Groundwater Sustainability Plan
GSWC	Golden State Water Company
GWh	gigawatt-hours
GWP	global warming potential

H_2S	hydrogen sulfide
HASP	health and safety plan
HazMat	hazardous materials
HCM	Historic-Cultural Monument
HCS	Historic Context Statement
HDV	heavy duty vehicle
HEC	historical environmental condition
HFC	hydrofluorocarbon
HI	hybrid industrial
HMBP	Hazardous Materials Business Plan
HMGP	Hazard Mitigation Grant Program
HMIS	Hazardous Material Identification System
HMMP	Hazardous Material Management Program
HMTA	Hazardous Materials Transportation Act
HPAC	Historic Preservation Advisory Committee
HPOZ	Historic Preservation Overlay Zone
HQTA	High Quality Transit Area
HSC	California Health and Safety Code
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law
HWRP	Hyperion Water Reclamation Plant
IBC	International Building Code
IFC	International Fire Code
IFFAR	Information on Fire Flow Availably Request
IG	industrial general
IIPP	Injury and Illness Prevention Program
IL	light industrial
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Water Resources Plan
IT	information technology
ITA	Los Angeles Information Technology Agency
IWMA	Integrated Waste Management Act
kW	kilowatt
kWh	kilowatt-hour
LA3	Los Angeles and Equinix
LAA	Los Angeles Aqueduct
LACFCD	Los Angeles County Flood Control District
LADBS	Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAGWRP	Los Angeles-Glendale Water Reclamation Plant
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	City of Los Angeles Bureau of Sanitation
LASD	Los Angeles County Sheriff's Department
LBP	lead-based paint
LDV	light duty vehicle
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level over a specified period of time
LEV	low-emissions vehicle
LID	Low-Impact Development

LOS	level of service
LRT	light rail transit
LST	localized significance threshold
LTCP	Long-Term Conservation Plan
LTWA	Long Term Water Agreement
LUST	leaking underground storage tank
MCE	maximum credible earthquake
MCL	maximum contaminant level
MDV	medium duty vehicles
MET	mental health evaluation team
MLD	most likely descendant
MM	mitigation measures
MMBtu	million British thermal units
MMRP	mitigation monitoring and reporting program
MMT	million metric tons
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MODRAT	modified rational method
MOU	Memorandum of Understanding
MPD	multiple property documentation
MPO	metropolitan planning organization
MPP	Policies and Procedures
MS4	Municipal Separate Storm Sewer Systems
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWh	megawatt-hour
MXD	mixed-use development
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NC	noise criteria
NEHRP	National Earthquake Hazards Reduction Program
NEN	Neighborhood Enhanced Network
NERC	North American Electric Reliability Corporation
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHMLAC	Natural History Museum of Los Angeles County
NHTSA	National Highway Traffic Safety Administration
NIBRS	National Incident-Based Report System
NMA	neighborhood mobility area
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	nitrogen oxide/oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OEHHA	California Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OHP	California Office of Historic Preservation
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OVA	organic vapor analyzer

PCB	polychlorinated biphenyls
PCE	perchloroethylene
PD	planned development
PDF	project design feature
PED	pedestrian enhanced district
PEV	plug-in electric vehicle
PFC	perfluorocarbons
PGA	peak ground acceleration
PGA	priority growth area
PHEV	plug-in hybrid electric vehicle
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIP	partnership in policing
PM	particulate matter
PM10	respirable particulate matter
PPV	peak particle velocity
PRC	California Public Resources Code
PV	photovoltaic
PVC	polyvinyl chloride
PWD	Public Works Department
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RHNA	Regional Housing Needs Assessment
RMS	root mean square
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SAR	Second Assessment Report
SAR	service advisory request
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAR	Sewer Capacity Availability Report
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SEL	sound exposure level
SEMS	Standard Emergency Management System
SF_6	sulfur hexafluoride
SFB	San Fernando Basin
SFHA	special flood hazard areas
SGC	Strategic Growth Council
SGF	sewage generation factors
SGMA	Sustainable Groundwater Management Act
SGMP	soil and groundwater management plan
SIP	state implementation plan
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SLM	sound level meter
SMGSA	Santa Monica Basin Groundwater Sustainability Agency
SMP	Stormwater Management Program
SO_2	sulfur dioxide

SO_{42}	sulfates
SoCalGas	Southern California Gas Company
SO_X	sulfur oxides
SRA	source receptor area
SRMP	Short-Range Mobility Plan
SRRE	Source Reduction and Recycling Element
SurveyLA	City of Los Angeles Historic Resources Survey
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWAT	special weapons and tactics
SWIRP	Solid Waste Integrated Resources Plan
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWQDv	stormwater quality design volume
SWQMP	Culver City Stormwater Quality Master Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAG	Transportation Assessment Guidelines
TCO	Temporary Certificate of Occupancy
TDM	transportation demand management
TDS	total dissolved solids
TEN	transit enhanced network
TeNS	Technical Noise Supplement
TMDL	total maximum daily load
TNM	Traffic Noise Model
TOD	transit-oriented development
TPA	Transit Priority Area
TPH	total petroleum hydrocarbons
TSCA	Toxic Substances Control Act
TSCG	Transportation Study Criteria and Guidelines
UFC	Uniform Fire Code
UFMP	Urban Forest Master Plan
ULARA	Upper Los Angeles River Area
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USGBC	United States Green Building Council
UST	underground storage tank
UWMP	Urban Water Management Plan
VCP	verified clay pipe
VdB	decibel notation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WBMWD	West Basin Municipal Water District
WDI	Waiver of Dedication and Improvement
WDR	waste discharge requirement
WSA	water supply assessment
WSAP	Water Supply Allocation Plan
WSCP	Water Shortage Contingency Plan
WSV	water supply verification
ZEV	zero-emission vehicle
ZI	zoning information
ZNE	zero net energy

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