Culver CITY
PLANNING DIVISION
9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507
(310) 253-5710
FAX (310) 253-5721

INITIAL STUDY

Project Title: Project Crossings

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

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

Project Sponsor: Culver Crossings Properties, LLC

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

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

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

☒ The Initial Study identified potentially significant effects, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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

www.culvercity.org

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

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

Culver CITY

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INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

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

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

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

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

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

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

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

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☒ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

November 2, 2021

Interim Current Planning Manager, City of Culver City — Date

PURPOSE OF THE INITIAL STUDY:

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- "Less than Significant Impact with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.

- "Less than Significant Impact" applies where the project creates no significant impacts, or only Less Than Significant impacts. An impact may be considered "less than significant" if "project design features" would be implemented by the project or if compliance with applicable regulatory requirements or standard conditions of approval would ensure impacts are less than significant.

- "No Impact" applies where a project does not create an impact in that category. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project would not displace existing residences). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to toxic pollutants, based on a project-specific screening analysis).

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resource Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
X. HYDROLOGY AND WATER QUALITY – Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	☒	☐	☐	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☒	☐	☐	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☒	☐	☐	☐
(iv) impede or redirect flood flows?	☒	☐	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐
XI. LAND USE AND PLANNING – Would the Project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
XII. MINERAL RESOURCES – Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
XIII. NOISE – Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐
XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☒	☐	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

ATTACHMENT A
PROJECT DESCRIPTION

A. INTRODUCTION

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

B. PROJECT LOCATION AND SURROUNDING USES

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

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

SOURCE: Open Street Map, 2021

Project Crossings

Figure A-1
Regional and Project Vicinity Locations

ESA

SOURCE: Nearmap, 2021

Project Crossings

Figure A-2
Project Location – Aerial Photograph

ESA

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

C. EXISTING CONDITIONS

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

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

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

D. EXISTING PLANNING AND ZONING

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

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

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

E. DESCRIPTION OF PROPOSED PROJECT

1. Proposed Land Uses

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

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

Table A-1
Existing and Proposed Floor Area

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

sf = square feet
SOURCE: 2021.

2. Open Space and Landscaping

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

SOURCE: Trammell Crow Company, 2021

Project Crossings

Figure A-3
Conceptual Site Plan

ESA

3. Height, FAR, and Setbacks

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

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

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

4. Access, Circulation, and Parking

Vehicular and Pedestrian Access and Parking

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

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

Public Transit

The Project Site is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Most significantly, the Project Site is located one block east from the Culver City stop of the Metro E (Exposition) Line light rail. Other transit operations in the vicinity of the site include Metro Bus Lines 33 and 617, Dash Commuter Express 437A, Culver CityBus 1, 5, and 7, and Big Blue Bus line 17. The Metro E (Exposition) Line and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day. Based on the Project Site's location in an area well served by public transportation, the Project Site is identified as being in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City of Los Angeles Zoning Information File (ZI) 2452.

5. Lighting and Signage

Exterior lighting would incorporate low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with CCMC and Los Angeles Municipal Code (LAMC) requirements. New street and pedestrian lighting within the public right-of-way would comply with applicable city regulations and would require approval from the jurisdiction having authority in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

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

6. Site Security

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

7. Sustainability Features

The Project would be designed to LEED Gold equivalent, inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen. These standards are intended to reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and

drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces that would meet or exceed the respective city codes; solar photovoltaic power, Energy Star–labeled appliances; and water-efficient landscape design.

8. Construction Schedule/Activities

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

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

F. NECESSARY APPROVALS

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

1. Culver City Parcel

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

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

2. Los Angeles Parcel

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

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

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

ATTACHMENT B
EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[2] City of Culver City, Historic Preservation, https://www.culvercity.org/Explore/Arts-Culture/Preservation#section-2. Accessed October 5, 2021.
[3] City of Los Angeles, Historic Places LA, http://historicplacesla.org/map. Accessed October 8, 2021.

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

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

Shade and Shadow

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

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

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

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

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

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

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

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

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

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

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

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

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

III. AIR QUALITY

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

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

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current 2016 Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollutions control measures needed to meet Federal particular matter (PM2.5) and Ozone (O_3) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs. The Project would increase the amount of air emissions which could affect implementation of the AQMP due to increased traffic and energy consumption, including potential increases in the amounts of gas and electricity needed to support the Project. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O3) standards, as well as the current particulate matter (PM10 and PM2.5) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard on the basis of source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designate the Los Angeles County portion of the basin as attainment for lead. The Project would result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O_3, PM10, and PM2.5. As such, implementation of the Project could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Project area. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

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

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

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

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

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

IV. BIOLOGICAL RESOURCES

Would the Project:

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

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

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

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

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

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

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

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

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

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

Mitigation Measure

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

1) Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed; or

2) If avoidance of the avian breeding season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) is not feasible, then:

   a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.

   b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area.

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

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

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

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

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

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

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

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

V. CULTURAL RESOURCES

Would the Project:

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

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

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.

(3) Any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, resources are considered historically significant if the resources are associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

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

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

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

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

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

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

VI. ENERGY

Would the Project:

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

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

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

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

VII. GEOLOGY AND SOILS

Would the Project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

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

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

ii. Strong seismic ground shaking?

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

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

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

iii. Seismic-related ground failure, including liquefaction?

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

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

iv. Landslides?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

VIII. GREENHOUSE GAS EMISSIONS

Would the Project:

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

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

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

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

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the Project:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

X. HYDROLOGY AND WATER QUALITY

Would the Project:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

iv. Impede or redirect flood flows?

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

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

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

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

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

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

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

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

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

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

XI. LAND USE AND PLANNING

Would the Project:

a. Physically divide an established community?

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

[11] California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles. Accessed October 6, 2021.
[12] City Culver City, Natural Hazards – Fire and Flooding, February 1, 2007.
[13] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996.

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

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

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

XII. MINERAL RESOURCES

Would the Project:

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

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

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

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

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

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

XIII. NOISE

Would the Project result in:

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

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

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

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

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

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

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

XIV. POPULATION AND HOUSING

Would the Project:

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

Less Than Significant Impact. The Project is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the RTP/SCS, and Regional Housing Needs Assessment (RHNA), in coordination with other State and local agencies. These documents provide guidelines for growth at the regional level, and include population, employment, and housing projections for the region and its subdivisions. On September 3, 2020, SCAG's Regional Council voted to approve and adopt the 2020-2045 RTP/SCS, which is an update to the previous 2016-2040 RTP/SCS. The 2020-2045 RTP/SCS reports demographic data for 2016, and projections for 2045.[15] The 2020-2045 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies.[16]

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

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

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

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

17 As provided by the Applicant.

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

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

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

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

XV. PUBLIC SERVICES

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

i. Fire protection?

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

ii. Police Protection?

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

iii. Schools?

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

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

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

iv. Parks?

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

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

v. Other public facilities?

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

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

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

XVI. RECREATION

a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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

XVII. TRANSPORTATION

Would the Project:

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

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

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

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

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

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

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

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

d. Result in inadequate emergency access?

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

[21] County of Los Angeles, Disaster Routes With Road Districts, September 24, 2021.
[22] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996.

XVIII. TRIBAL CULTURAL RESOURCES

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

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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

XIX. UTILITIES AND SERVICE SYSTEMS

Would the Project:

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

Water

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

Wastewater

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

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

Stormwater Drainage

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

Electric Power

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

Natural Gas

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

Telecommunications

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

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

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

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

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

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

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

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

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

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

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

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

Table B-1
Projected Solid Waste Generated During Operation

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

sf = square feet; lbs. = pounds

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

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

Source: ESA, 2021.

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

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

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

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

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

XX. WILDFIRE

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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

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

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix A
Street Tree Report

PROJECT CROSSINGS PROJECT

Street Tree Report

Prepared for

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

October 2021

PROJECT CROSSINGS PROJECT

Street Tree Report

Prepared for:
Culver Crossings Properties, LLC
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October 2021

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PROJECT CROSSINGS PROJECT

Street Tree Report

Introduction

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

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

Background and Assignment

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

Project Description

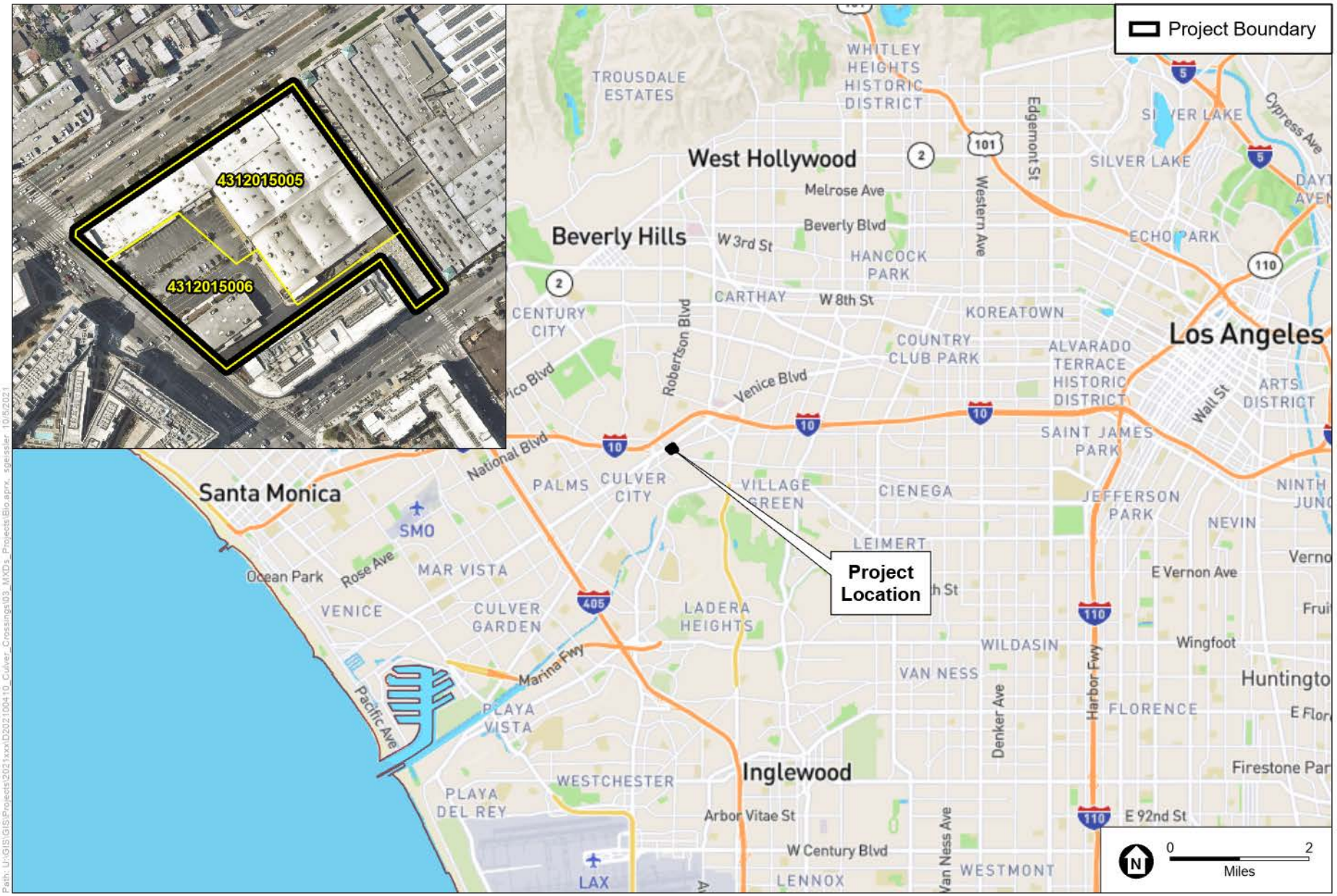
The proposed project would construct two four- to five-story buildings, that would provide a total of 536,000 sf of new office floor area. The two buildings would have the ability to be connected via a shared wall. The Project provides a total of 1,215 vehicular parking spaces within two separate three-level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

Existing Conditions

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

Methodology

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



SOURCE: Mapbox, 2021; ESA, 2021

Project Crossings

Figure 1
Project Location and Regional Vicinity

ESA

The following data was collected for each street tree:

Physical Characteristics

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

Physical Condition

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

Rating

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

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

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

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

Results

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

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

Impacts

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

Required Replacement

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

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

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

SOURCE: Nearmap, 2021

Project Crossings

Figure 2
Tree Plot Plan

ESA

If trees cannot be transplanted;

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

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

Bibliography

City of Culver City. 2018. Municipal Code. Accessed October 2021. https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-70171.

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

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

Certification of Performance

I, Douglas Gordon-Blackwood, certify:

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

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

Signed:

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

This report comprises a total of 37 pages and four full-size maps. Unauthorized separation or removal of any portion of this report deems it invalid as a whole. Conditions represented in this report are limited to the inventory date and time. Rating for health and structure do no constitute a health or structural guarantee beyond that date.

Arborist Disclosure Statement

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

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

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

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

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

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Appendix A
Street Tree Inventory

APPENDIX A
STREET TREE INVENTORY

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

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

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

Appendix B
Street Tree Photographs

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

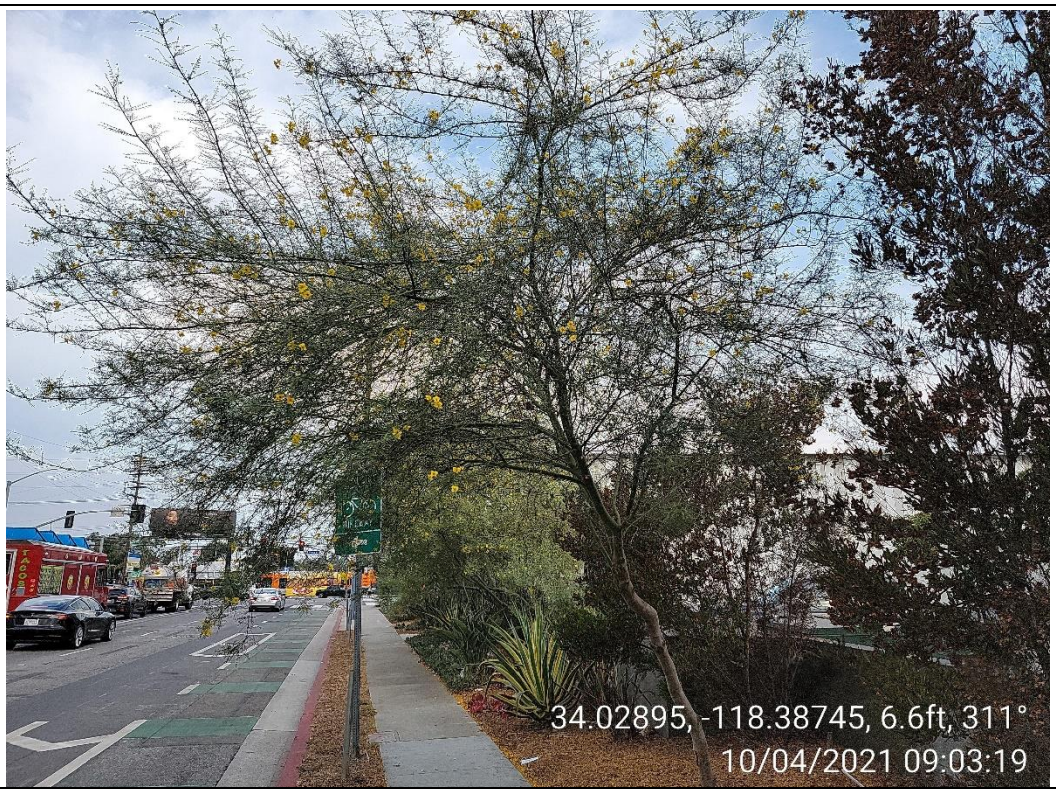

Photo 2: View of Tree #2 – Desert Museum palo verde, facing northwest. Unregulated Tree – Culver City.

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

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

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

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

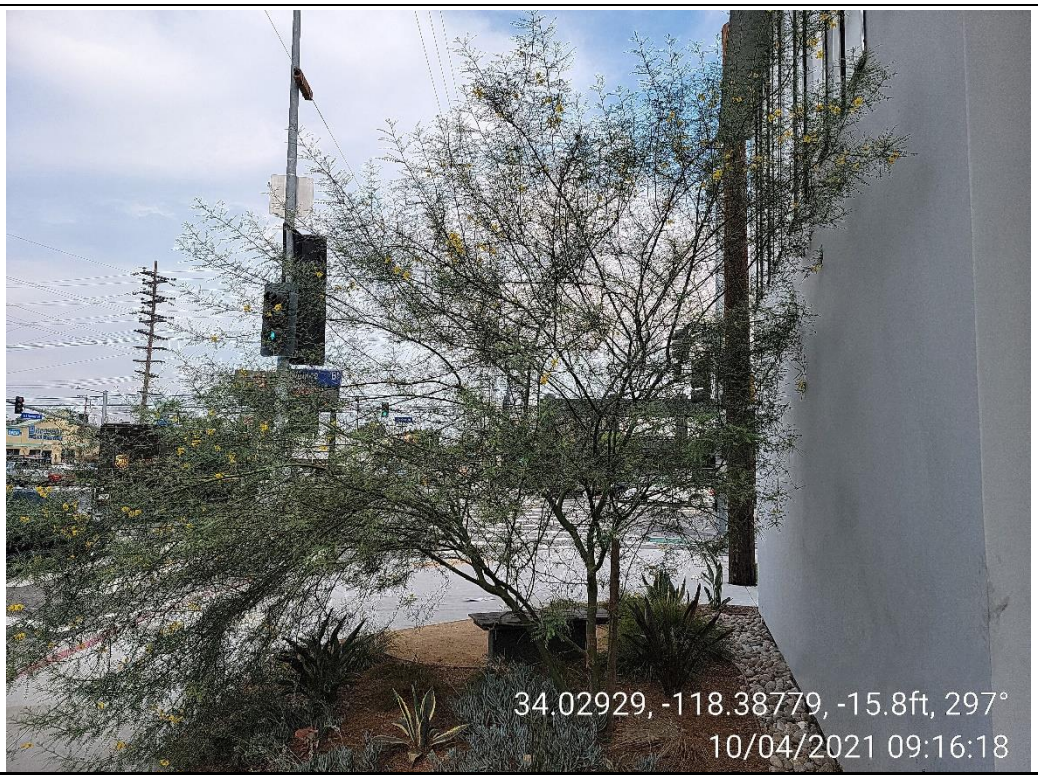

Photo 7: View of Tree #7, Desert Museum palo verde, facing northwest. Unregulated Tree – Culver City.

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

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

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

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

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

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

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

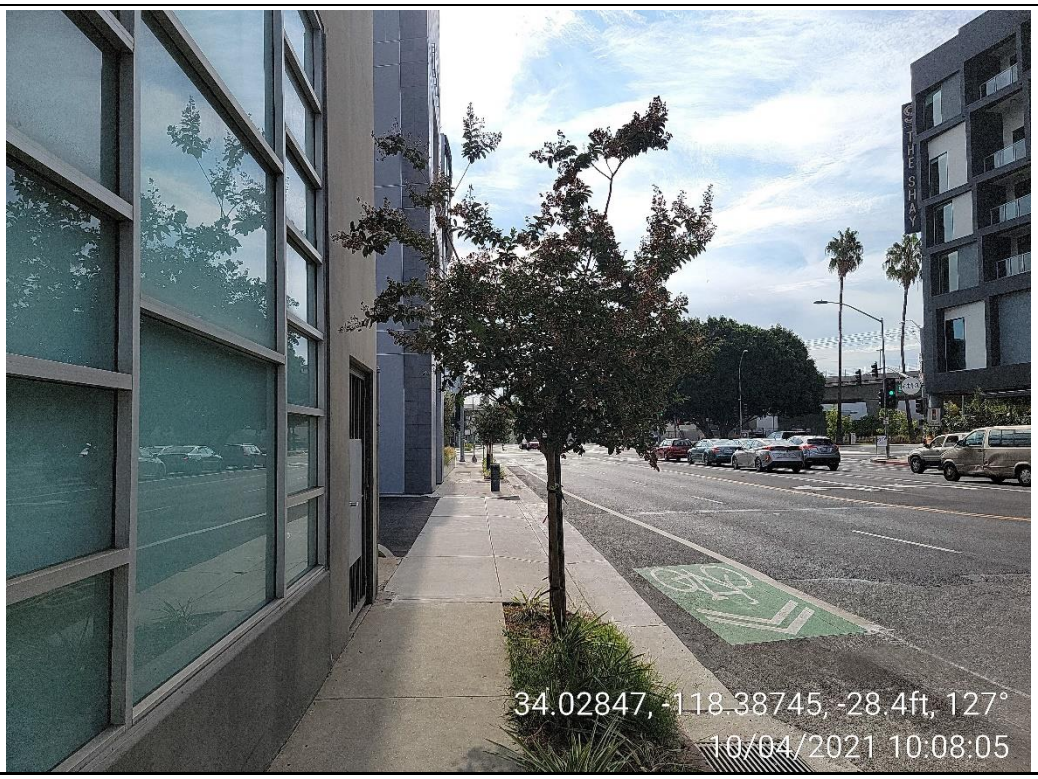

Photo 15: View of Tree #15 – Crape myrtle, facing southeast. Regulated Tree – Culver City.

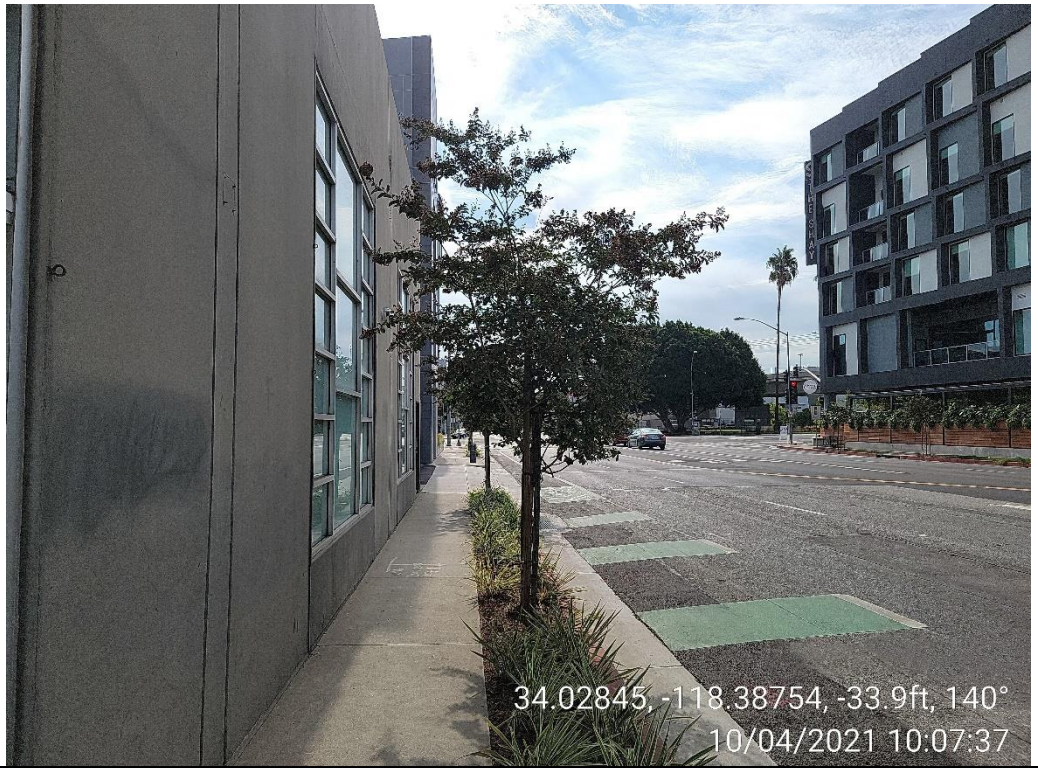

Photo 16: View of Tree #16 – Crape myrtle, facing southeast. Regulated Tree – Culver City.

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

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

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

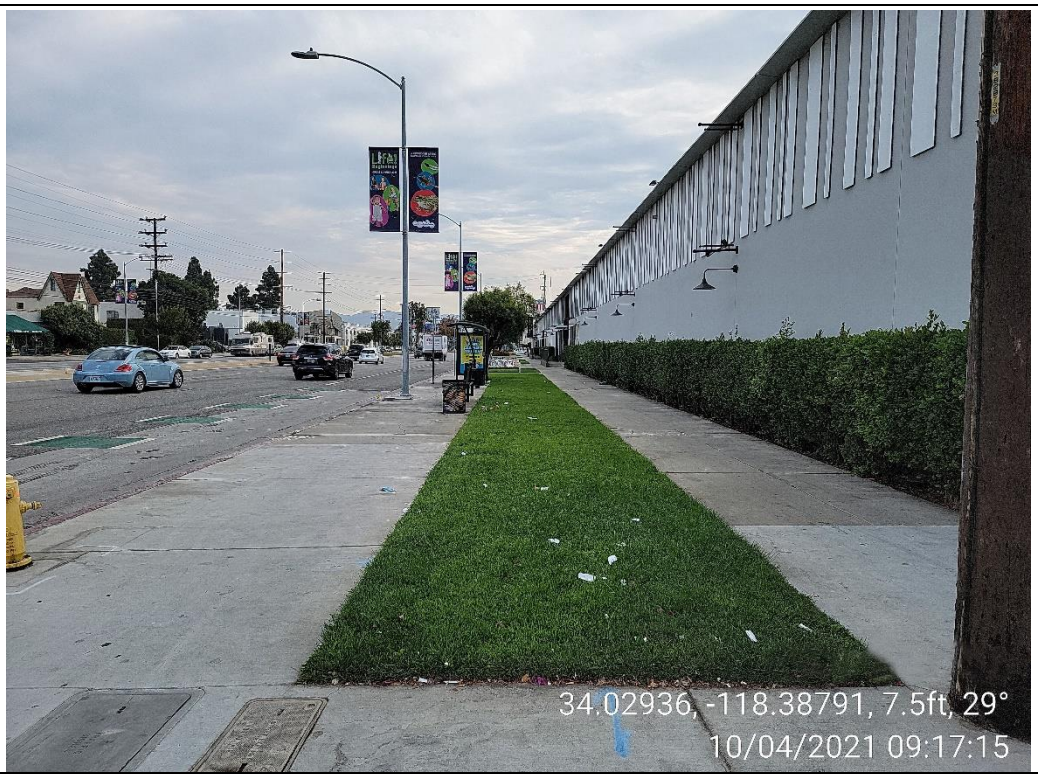

Photo 20: View east along Venice Boulevard from intersection of Venice Boulevard and National Boulevard

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

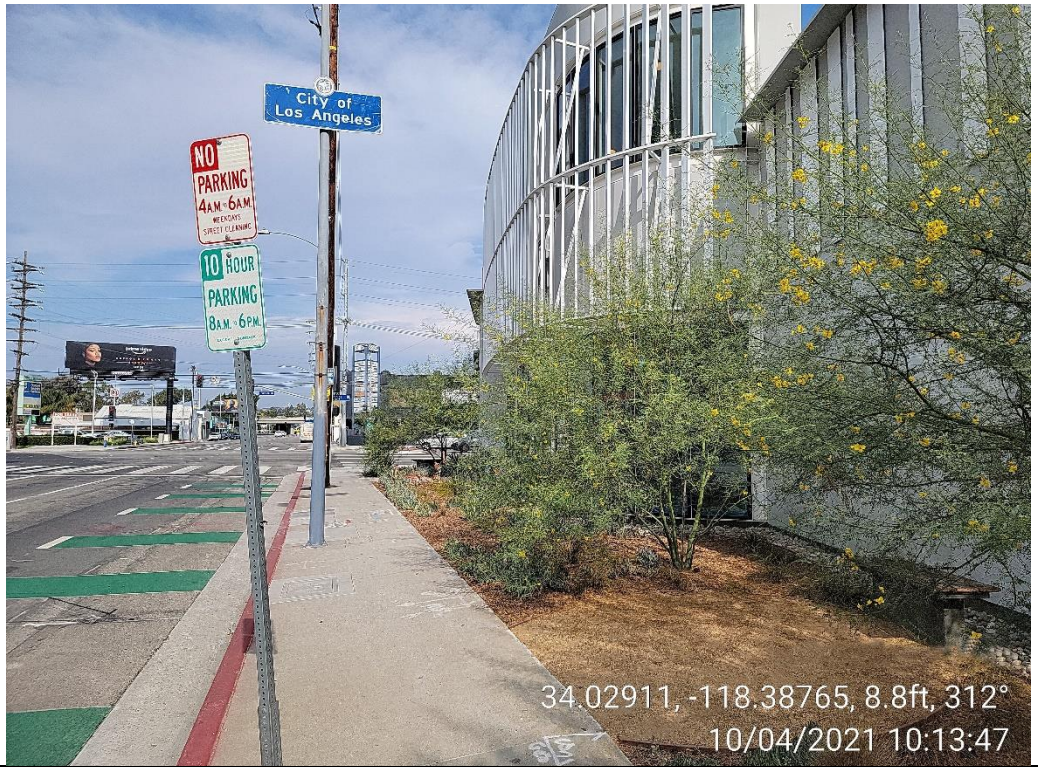

Photo 22: View northwest along National Boulevard towards Venice Boulevard. Photo depicts trees beyond parkway and sidewalk.