CROSSINGS CAMPUS

Final Environmental Impact Report
State Clearinghouse No. 2021110079

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

October 2022

ESA

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CHAPTER 1
Introduction

1.1 Purpose of the Final EIR

The City of Culver City (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed Crossings Campus Project (Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprise the Final EIR.

As described in CEQA Guidelines Sections 15088, 15089, 15090 and 15132, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

1.2 Project Summary

As further described in Chapter 2, Project Description, of the Draft EIR, the Project Site encompasses an approximately 4.46-acre (194,334-square-foot [sf]) site at 8833 and 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886, and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel). The Project 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 Culver City Parcel is currently developed with two warehouse buildings: (1) a 9,739-sf building that is currently used for storage; and (2) a 9,082-sf building that is currently vacant. The two existing buildings total 18,821 sf of floor area. The balance of the Culver City Parcel consists of surface parking and vehicular access that supports the existing uses on the Project Site. The Los Angeles Parcel is currently improved with an 86,226-sf warehouse building that has been partitioned into six separate spaces consisting of 51,500 sf of office and 34,726 sf of retail. In addition to the floor area, there are 70 spaces of enclosed vehicular parking.

The Project would involve demolition of the three existing buildings on the Project Site, totaling 105,047 sf, to support the proposed 536,000-sf integrated office complex. The Project would consist of two buildings, one on each of the two properties that comprise the Project Site. Building 1 (on

the Culver City Parcel) involves demolition of existing surface parking and two buildings totaling 18,821 sf and construction of a new 167,000-sf office building. Building 1 would be four stories, measuring up to 56 feet in height to the top of the roofline, with a three-level subterranean garage containing 478 vehicular parking spaces and 51 bicycle parking spaces. Building 2 (on the Los Angeles Parcel) involves demolition of the existing building totaling 86,226 sf and construction of a new 369,000-sf office building. Building 2 would be four to five stories, measuring 56 feet to 75 feet in height to the top of the roof, with a three-level subterranean garage containing 738 vehicular parking spaces and 124 bicycle parking spaces.

The Project would include office space suitable for approximately 2,400 occupants and could include associated production spaces for multimedia content creation and capture.[1] Amenities for the building tenants would include an employee cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The total floor area for the Project at final build-out would be 536,000 sf, with a floor area ratio (FAR) of 2.76:1. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, a 7,120 sf publicly accessible, privately maintained amenity area along Washington Boulevard, as well as a 51,600-sf internal courtyard for the use of employees and occasional private tenant events.

Vehicular access to the new below-grade parking, as well as loading docks and trash areas, would be provided via two driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and a new driveway and curb cut adjacent to the existing Helms alley driveway along Venice Boulevard. Both driveways would provide right-turn only ingress and right-turn only egress. A third, secondary driveway from Washington Boulevard would provide right-turn ingress for employee vehicles and emergency vehicles to the Culver City and Los Angeles Parcels.

The Project would provide a total of 1,216 vehicular parking spaces within two garages on the Culver City Parcel and the Los Angeles Parcel, respectively, each containing three-level subterranean parking and electric vehicle (EV) spaces that would comply with the Comprehensive Plan in Culver City and the CPIO, as proposed to be amended. in Los Angeles.

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

Pedestrian access to the buildings would be provided from entrances located on the perimeter of the Project Site from National Boulevard and Venice Boulevard. The Project would enhance pedestrian circulation and promote an active streetscape with connections to Helms Bakery

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

Complex, Ivy Station, and the Metro "E" Line Station, through increased sidewalk and parkway widths, enhanced parkway landscape and street trees along National Boulevard and Venice Boulevard. The Project would include the development of a publicly accessible, privately maintained amenity area along Washington Boulevard.

The Project Site would be served by an existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Station. The shuttle would run between 8 a.m. and 6 p.m., Monday through Friday, with a 10-minute to 15-minute frequency. Specific pick-up/drop-off locations might include other Apple-occupied buildings in the area and the Culver City Station transit drop-off location on Robertson Boulevard. There would be a curbside cut-out on Venice Boulevard to serve as a pick-up and drop-off area for the Project Site. The employee shuttle stop would be designed with sufficient distance as to not interfere with the function of the municipal bus stop located on the southeast corner of the Venice and National Boulevard intersection. Additionally, the Project Site would be served by future commuter shuttle service, providing employee transportation from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours.

1.3 Overview of the CEQA Public Review Process for the Draft EIR

In compliance with the CEQA Guidelines, the City, as the Lead Agency for the Project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact and solicit input from the public and various State, regional, and local government agencies and other interested parties on the Project.

1.3.1 Initial Study/Notice of Preparation

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

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 45-day review period commencing November 4, 2021 and ending December 20, 2021. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A of the Draft EIR for a copy of the NOP.

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments,

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

During the public review period for the NOP, 38 commenters submitted responses to the NOP. Correspondence was received from the State of California Department of Transportation (Caltrans), Native American Heritage Commission, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), Los Angeles Department of Water and Power (LADWP), Los Angeles County Metropolitan Transportation Authority (Metro), and the City of Los Angeles Bureau of Sanitation, as well as interested organizations, and interested parties. All written comments are provided in Appendix A, of the Draft EIR.

1.3.2 Draft Environmental Impact Report

In accordance with the provision of CEQA Guidelines Sections 15085(a) and 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library, Baldwin Hills Branch Library, and City of Los Angeles Central Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website at: https://www.culvercity.org/City-Projects/G-Planning-Projects); (5) sent a NOA to all property owners within 1,000 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on July 21, 2022 and ended on September 6, 2022 for a total of 47 days.

During the Draft EIR public review period, the City Planning Division received eleven (11) comment letters on the Draft EIR from agencies and organizations through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters, of this Final EIR. Also during the Draft EIR public review period, the City conducted a Public Meeting focused on the Draft EIR on August 16, 2022. This Public Meeting was not required by the CEQA Guidelines, but rather conducted by the City to provide an additional opportunity for public input. The Public Meeting on the Draft EIR provided an overview of the findings in the Draft EIR, explained the process for providing comments on the document, and outlined the remaining process for completion of a Final EIR. Copies of the materials provided at the Public Meeting on the Draft EIR are included in Appendix B of this Final EIR. All written comments received during the public

review period and also during the Public Meeting on the Draft EIR are presented, and responses are provided in Chapter 2, *Comments and Responses*, of this Final EIR.

1.4 Organization of the Final EIR

The Final EIR consists of the following four chapters:

Chapter 1, Introduction. This chapter describes the purpose of the Final EIR, provides a summary of the Project, summarizes the Draft EIR public review process, and presents the contents of this Final EIR.

Chapter 2, Comments and Responses. This chapter presents all comments received by the City during the 47-day public review period of the Draft EIR (July 22, 2022 to September 6, 2022) and during the virtual Public Meeting held on August 16, 2022 as well as the responses to those comments. A total of eleven (11) comment letters were received during the public comment period.

Chapter 3, Revisions, Clarifications and Corrections to the Draft EIR. This chapter includes revisions to the Draft EIR that represent minor changes or additions in response to some of the comments received on the Draft EIR, and additional edits to provide clarification to the Draft EIR text. Changes to the Draft EIR are shown with ~~strikethrough~~ text for deletions and double underline text for additions. These changes do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR.

Chapter 4, Mitigation Monitoring Program. The Mitigation Monitoring Program (MMP) is the document that will be used by the City to ensure the implementation of the Project's mitigation measures and project design features. Mitigation measures and project design features are listed by environmental topic where applicable.

Appendices to the Final EIR. The following list sets forth the appendices as referenced throughout the Final EIR.

- Appendix A: Original Comment Letters on the Draft EIR
- Appendix B: Draft EIR Public Meeting Materials
- Appendix C: Human Health Risk Assessment
- Appendix D: Soil Pre-Characterization Survey for Disposal
- Appendix E: Supplemental Air Quality Emissions Calculations

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CHAPTER 2
Comments and Responses

CEQA Guidelines Section 15088(a) states that: "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this chapter of the Final EIR provides responses to each of the comments on the Draft EIR received during the public comment period. **Table 2-1,** *Summary of Comments on the Crossings Campus Project Draft EIR,* provides a list of the comment letters received and the corresponding issues that were raised in response to the Draft EIR.

Section 2.1, Responses to Individual Comments, presents comments submitted during the 47-day public review comment period for the Draft EIR from State agencies, as well as from individuals and organizations as listed on Table 2-1. Each letter is assigned a number and arranged by agency first, and then by individuals and other interested parties in chronological order, as indicated in Table 2-1. Note as discussed in Chapter 1, *Introduction,* of this Final EIR, the City held a Public Meeting on the Draft EIR on August 16, 2022, during which oral comments were received. These comments are addressed below within Letter 4.

Each comment that requires a response within the letters is also assigned a number. For example, the first State Agency (Letter 1) to provide comments was the California Department of Toxic Substances Control (DTSC) and therefore this is Letter 1. The first comment received from DTSC within the letter is therefore labeled Comment 1-1 and the responses to each comment are correspondingly numbered, (i.e., Response 1-1). A copy of each comment letter is provided in Appendix A, Original Comment Letters on the Draft EIR, of this Final EIR.

Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR. As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided for comments that do not relate to environmental issues.

TABLE 2-1
SUMMARY OF COMMENTS ON THE CROSSINGS CAMPUS PROJECT DRAFT EIR

Letter No.	Name	Date Received	Environmental Category				
			Air Quality/ GHG	Cultural/ Tribal Resources	Hazards	Traffic	Other
1	California Department of Toxic Substances Control (DTSC) Email: Jose.Diaz@dtsc.ca.gov	7.27.2022			X		
2	Gabrieleno Tribe of Mission Indians – Kizh Nation Email: admin@gabrielenoindians.org	7.28.2022		X			
3	LA Sanitation and Environment (LASAN) Address: 2714 Media Center Drive Los Angeles, CA 90065	8.2.2022					X
4	Los Angeles Department of Water & Power (LADWP) Address: 111 N. Hope Street Los Angeles, CA 90012	8.29.2022					X
5	California Department of Transportation (Caltrans) Address: 100 S. Main Street, MS 16 Los Angeles, CA 90012	9.1.2022				X	
6	Lozeau Drury, LLP Address: 1939 Harrison Street, Suite 150 Oakland, CA 94612	9.2.2022					X
7	Arts District Residents Association of Culver City Address: 5610 South Garth Avenue Los Angeles, CA 90056	9.6.2022				X	
8	KOA Address: 300 Corporate Pointe, Suite 470 Culver City, CA 90230	9.6.2022				X	
9	South Coast Air Quality Management District (SCAQMD) Address: 21865 Copley Drive Diamond Bar, CA 91765	9.6.2022	X				
10	UNITED HERE Local 11 Address: 801 South Grand Avenue, 11th Floor Los Angeles California, 90017	9.6.2022	X				X
11	Walter N. Marks Incorporated Address: 8758 Venice Boulevard Los Angeles, CA 90034	9.6.2022				X	X
PMC	Questions from the Public Meeting on the Draft EIR	8.16.2022				X	X

Source: ESA, 2022

2.1 Responses to Individual Comments

Responses to individual comments are included on the following pages.

Letter 1

California Department of Toxic Substances Control (DTSC)
Jose.Diaz@dtsc.ca.gov
Email received July 27, 2022

Comment 1-1

According to the Initial Study, soil vapor, indoor air, and groundwater sampling investigation was conducted on the Project Site that included the collection and analysis of 16 subsurface soil vapor samples, three groundwater samples, and 12 indoor air samples, and five outdoor air samples at various locations. Soil vapor sampling results were compared to Department of Toxic Substances Control (DTSC) and USEPA vapor intrusion screening levels for commercial land use. Perchloroethene (PCE; also referred to as tetrachloroethene) was detected in sub-slab soil vapor in the northern portion of the Project Site at concentrations above its screening level for commercial land use. Several other volatile organic compounds (VOCs) were also detected but at concentrations below their screening levels for commercial land use. Follow-up indoor air sampling conducted within the Venice Boulevard buildings did not identify PCE or other VOCs at concentrations above their respective screening levels.

Response to Comment 1-1

This comment accurately summarizes the soil vapor, indoor air, and groundwater sampling investigation that was performed for the Project Site as provided in the Phase I Environmental Site Assessment, included in Appendix H, Phase I ESA, of the Draft EIR. This comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Comment 1-2

The full nature and extent of PCE contamination should be investigated and a human health risk should be performed to determine if those detections would pose a risk to human health in an unrestricted land use scenario. If the property or portions of the property do not meet the unrestricted land use scenario institutional controls such a land use restrictions or mitigation measures should be implemented to protect future occupants of the property.

Response to Comment 1-2

This comment requests that a human health risk assessment be performed to determine if detections of vapor intrusion would pose risk to human health. A preliminary Human Health Risk Assessment (HHRA) using conservative assumptions was performed for the Project and is included as Appendix C of this Final EIR. The analysis in the HHRA studied the human health risks for future on-site office workers, and valet parking personnel and workers within the food preparation and office space in parking level 1 (collectively referred to as "parking level 1 office space"). The HHRA concluded that the potential human health risks for future on-site office workers (referred

to as C/I workers in the HHRA) and parking level 1 office space workers [estimated incremental lifetime cancer risk of 1 x 10-6 and Health Index (HI) of 0.02] are at and below applicable target risk levels established by DTSC. Based on maximum concentrations in the soil vapor dataset, the nature of the Project's subterranean garage with vapor barriers, and application of the appropriate DTSC attenuation factor, it is not anticipated that volatile organic compounds (VOCs) in soil vapor will pose a significant risk to future on-site office workers or parking level 1 office space workers. With regard to future valet parking personnel, potential human health risks (estimated incremental lifetime cancer risk of 1 x 10-5 and HI of 0.2) are above and below target risk levels, respectively. VOCs in soil vapor may pose a significant risk to future valet parking personnel without mitigation. It is critical to note that the contemplated Project, which includes excavation, soil removal, dewatering and construction of the subterranean parking garages with a vapor barrier installed, will significantly reduce the potential for vapor intrusion into the proposed office buildings. As recommended in the HHRA, the Applicant will conduct at least two rounds of indoor and garage air sampling post-construction and prior to occupancy to confirm that all on-site workers and valet parking personnel are adequately protected and potential human health risks due to vapor intrusion are below target risk levels. As shown in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR, Mitigation Measure HAZ-MM-2 has been supplemented to include the collection of this additional data as recommended in the HRRA to fully investigate and implement measures to ensure potential vapor intrusion risks are less than significant. Additionally, a Soil and Groundwater Management Plan (SGMP) will be developed that will include health and safety measures to ensure protection of workers during construction activities. This clarification of Mitigation Measure HAZ-MM-2 does not materially change the purpose and intent of the mitigation measure, which was previously prescribed for the Project in part to ensure any potential soil vapor risks to workers at the Project Site are addressed prior to occupancy of the building. The potential for vapor risk was identified in the impact analysis included under Thresholds HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR. Because the revised mitigation measure is not a new mitigation measure, not related to a new significant environmental impact or an increase in the severity of an impact that would result from the Project, or otherwise indicate the Draft EIR was fundamentally flawed, the addition to the mitigation measure does not require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

Comment 1-3

The Department of Toxic Substances Control (DTSC) oversees the investigation and cleanup of properties contaminated with hazardous substances and/or wastes. DTSC has professional staff that works on site characterization and cleanup activities and provides guidance through its Site Mitigation & Restoration Program (SMRP). The SMRP enables parties to assess and remediate contaminated properties in a cost-effective cooperative manner.

Additional information on the Voluntary Agreements can be found on our website using the following link. Thank you for your attention to this matter.

https://dtsc.ca.gov

https://dtsc.ca.gov/brownfields/voluntary-agreements-guick-reference-guide/

https://dtsc.fluxx.io/user_sessions/new

Response to Comment 1-3

This comment provides a general conclusion as well as additional information regarding the Department of Toxic Substances Control (DTSC). This comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Letter 2

Gabrieleno Tribe of Mission Indians – Kizh Nation
admin@gabrielenoindians.org
Email received July 28, 2022

Comment 2-1

Thank you Mr. Anderson for the great relationship, understanding and respect. We agree to the mitigations your provided July 7, this can conclude consultation.

Response to Comment 2-1

This comment concluding tribal consultation is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Letter 3

LA Sanitation and Environment (LASAN)
2714 Media Center Drive
Los Angeles, CA 90065
Letter received August 2, 2022

Comment 3-1

This is in response to your July 21, 2022 Notice of Completion and Availability of Draft Environmental Impact Report and Public Meeting for the proposed office building, auto parking and two sewage ejectors project located at 8833, 8825 National Boulevard and 8771 Washington in Culver City, CA 90232; and 8876, 8884, 8886 and 8888 Venice Blvd and 8827, 8829 National Blvd, Los Angeles, CA 90232. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is in the final stages of the California Environmental Quality Act review process and requires no additional hydraulic analysis. Please notify our office in the instance additional environmental review is necessary for this project.

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

Response to Comment 3-1

This comment affirming that no additional hydraulic analysis is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Letter 4

Los Angeles Department of Water & Power (LADWP)
111 N. Hope Street
Los Angeles, CA 90012
Received August 29, 2022

Comment 4-1

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Crossings Campus Project (Project) located at 8833 and 8825 National Boulevard and 8771 Washington in Culver City, CA 90232; and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, CA 90232. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. Based on our review of the Draft Environmental Impact Report (EIR) prepared for the Project, we respectfully submit the comments below:

Response to Comment 4-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Response to Comments 5-2 through 5-4.

Comment 4-2

Joint System:

1. This response shall not be construed as an approval for any project.

Response to Comment 4-2

This comment stating that the response is not construed as an approval for any project is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 4-3

Water System:

Chapter 5 Alternatives

1. The Santa Monica Basin (SMB), a medium-priority basin designated by the California Department of Water Resources and managed by the Santa Monica Basin Groundwater Sustainability Agency (SMBGSA), underlies the project site. Based on our review of the draft EIR, it is our understanding that the project's alternatives propose construction methodologies that would extend excavations below the depth to groundwater (historical high and levels encountered during site exploration), necessitating the use of a dewatering system, potentially affecting the SMB's groundwater resources. We recommend that the Project be submitted to the SMBGSA for verification of conformity with the rules and regulations, particularly those pertaining to groundwater extractions. More information

about the SMBGSA is available by calling (310) 458-8231 or visiting https://www.santamonica.gov/gsp.

Response to Comment 4-3

This comment raises concerns regarding dewatering necessitated under the Project's proposed alternatives. As noted in Table 5-1, in Chapter 5, *Alternatives*, of the Draft EIR, both the Project and alternatives would include the development of subterranean parking that would reach 50 feet below ground surface (bgs). As with the Project, excavations for the alternatives would require dewatering to facilitate construction of the parking garages and foundations for the buildings. As with the Project, the alternatives would be required to comply with applicable National Pollutant Discharge Elimination System (NPDES) permitting requirements and the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge requirements (WDRs) for discharges of groundwater from construction and project dewatering to surface waters in coastal watersheds of Los Angeles and Ventura counties. With compliance with existing regulations, impacts associated with the discharge of dewatering effluent during construction of the Project and the alternatives would be less than significant. In addition, the underground parking garages under both the Project and alternatives would be designed properly such that permanent dewatering would not be required and would not impact groundwater supplies. That is, no long-term extraction affecting groundwater would occur. For these reasons, the Project would not be expected to impede sustainable groundwater management of the Santa Monica Basin. Nonetheless, while no long-term extractions would occur, the Applicant will contact the Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) for verification of conformity with the rules and regulations, particularly those pertaining to groundwater extractions.

Comment 4-4

For any questions regarding the above comments, please contact Ms. Jazmin Martin of my staff at (213) 367-1768 or Jazmin.Martin@ladwp.com.

Response to Comment 4-4

This comment provides a general conclusion to this correspondence. The comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Letter 5

California Department of Transportation (Caltrans)
100 S. Main Street, MS 16
Los Angeles, CA 90012
Received September 1, 2022

Comment 5-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project Site is currently improved with low-rise warehouses that have been converted into retail and office uses as well as surface and enclosed parking lots serving the existing uses on the Project Site. The Project would demolish the existing buildings on the Project Site and construct two four- to five-story buildings that would provide a total of 536,000 square feet (sf) of new office floor area, which is intended to be occupied by Apple Inc. The Project would provide a total of 1,216 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 175 bicycle parking spaces. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, a publicly accessible, privately maintained amenity area along Washington Boulevard in a small park-like setting, as well as an internal courtyard for the use of employees and occasional private tenant events.

Response to Comment 5-1

This comment provides a general introduction to the comments raised in this correspondence. This comment also provides an accurate summary of the Project. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 5-2

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

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

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

Response to Comment 5-2

This comment introduces the mission of Caltrans in providing a safe and reliable transportation network and the CEQA mandated review of VMT in determining transportation impacts. As the

comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Comment 5-3

The project features, location, and design would be consistent with both City's plans, programs, ordinances, and policies that support alternative transportation and have been adopted to protect the environment. Therefore, the project would have a less than significant impact on both City's transportation-related plans, programs, ordinances, and policies.

The project is not projected to substantially increase hazards, conflicts, or preclude City action to fulfill or implement projects associated with surrounding transportation networks and will contribute to overall walkability through enhancements to the project site and streetscape. Therefore, the project is expected to have a less than significant impact.

The project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT as it is located less than 600 feet from the Metro E Line Culver City Station, well within the ½ mile from a key Transit Priority Area as identified in Threshold 2, Transportation Study Criteria and Guidelines (TSCG). Therefore, a less than significant impact is presumed. However, the Project proposes voluntary TDM measures which would reduce project traffic.

Response to Comment 5-3

This comment concurs with the findings provided in Section 4.12, *Transportation*, of the Draft EIR as it relates to the analysis for Threshold TRAF-1, conflict with program, plan, ordinance or policy addressing the circulation system; Threshold TRAF-2, which relates to CEQA Guidelines Section 15064.3, Subdivision (b); and Threshold TRAF-3, substantially increase hazards due to geometric design feature or incompatible uses. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 5-4

The following voluntary TDM measures will be implemented to reduce vehicle trips generated by the project. The project will offer a wide variety of options to support employees choose to use a commute alternative to reach their destination. These programs are designed to make non-auto commutes attractive and viable options by providing employees with mobility once they arrive at work, access to needed services during the day, or financial incentives to participate.

1. TDM Support Services,
2. Marketing and Communications,
3. Public Transit,
4. Rideshare,
5. Bicycling,
6. Walking,

7. Pre-tax Commuter Benefit,
8. Commuter Club,
9. Commute Expert Program,
10. Guaranteed Ride Home Program,
11. Intercampus Shuttles,
12. Campus Bike Share Program, and
13. On-site Services.

Response to Comment 5-4

This comment accurately summarizes the voluntary transportation demand management (TDM) measures as described in Project Design Feature TRAF-PDF-2, provided on pages 4.12-25 and 4.12-26 in Section 4.12, *Transportation*, of the Draft EIR. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 5-5

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

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

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

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

Response to Comment 5-5

This comment encourages the Lead Agency to evaluate the potential of TDM strategies and Intelligent Transportation System (ITS) applications and provides resources to access the recommended strategies. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 5-6

On page 81 of the Transportation Impact Study, "The addition of Project traffic under all three analysis scenarios is not projected to cause or add to a queue extending onto the freeway mainline by less than two car lengths. Therefore, the Project is expected to cause a less than significant safety impact." As a reminder, existing signal timing should use the actual signal timing for the queuing analysis to produce accurate analysis.

Response to Comment 5-6

This comment states that the existing signal timing should use the actual signal timing for the queuing analysis. This comment is noted. As part of the analysis provided in the Transportation Impact Study, included in Appendix M of the Draft EIR, Fehr & Peers obtained current signal timing plans from the cities of Culver City and Los Angeles for each signal studied, as well as performed field verification of the signal timing. The timing plans were inputs to the Synchro analysis.

Comment 5-7

Any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.

Response to Comment 5-7

This comment regarding oversized trucks requiring a permit and recommendation that large-size truck trips be limited to off-peak commute periods is noted. Because this comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 5-8

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-04008-DEIR.

Response to Comment 5-8

This comment provides Caltrans contact information in the event additional information is needed. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Letter 6

Lozeau Drury, LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
Received September 2, 2022

Comment 6-1

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the project known as Crossings Campus (Case No. P2022-0144-CP/ZCMA, P2021-0272-EIR), including all actions related or referring to the construction of two four- to five-story buildings that would provide a total of 536,000 square feet of new office floor area and a total of 1,216 vehicular parking spaces within two three-level subterranean garages under each proposed building, located at 8833 and 8825 National Boulevard and 8771 Washington Boulevard in the City of Culver City, and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in the City of Los Angeles ("Project").

Response to Comment 6-1

This comment provides a general introduction to commenter (SAFER) and the comments raised in this correspondence. Responses to the specific comments raised are provided below in Response to Comments 7-2 through 7-3.

Comment 6-2

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Planning Division address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

Response to Comment 6-2

This comment stating that the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts is noted. However, the commenter does not provide any substantive facts or support for these concerns or opinions. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Comment 6-3

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Response to Comment 6-3

This comment stating that the commenter reserves the right to supplement the comments provided in this correspondence is noted herein. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Letter 7

Arts District Residents Association of Culver City
5610 South Garth Avenue
Los Angeles, CA 90056
Received September 6, 2022

Comment 7-1

This letter is written on behalf of an association of concerned individuals sometimes referred to as the Arts District Residents Association of Culver City ("Residents Association"). These associations are comprised of members of the Culver City community who are concerned about the above-referenced Project.

We have reviewed the Draft EIR and are in agreement with the proposed location of a traffic signal and entrance on Venice Boulevard. We also acknowledge that another workable solution would be to move the entrance approximately 50 yards further west.

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

Response to Comment 7-1

This comment acknowledging support for a traffic signal on Venice Boulevard as analyzed under Alternative 4 in the Draft EIR is noted. This comment also states that another workable solution would be to move the driveway entrance 50 yards further west from the proposed location under the Project. However, moving the entrance would conflict with the Project design and with access to alternative transportation facilities (i.e., bus and future shuttles) along Venice Boulevard. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Letter 8

KOA
300 Corporate Pointe, Suite 470
Culver City, CA 90230
Received September 6, 2022

Comment 8-1

KOA Corporation has performed a cursory review of the Crossings Campus office development (the "Project") proposed by Culver Crossings Properties, LLC, and intended to be occupied by Apple Inc. at the following addresses in the Cities of Culver City and Los Angeles:

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

The City of Culver City, as Lead Agency, has prepared a Draft Environmental Impact Report (EIR) for the Project pursuant to the requirements of the California Environmental Quality Act (CEQA). The City of Culver City is in the process of collecting comments during the Draft EIR public review period from July 21, 2022 to September 6, 2022. As part of our review, we have the following comments on the Transportation Impact Study (TIS) prepared for the Project by Fehr & Peers in July 2022 and included as Appendix M to the Draft EIR.

Response to Comment 8-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Response to Comments 9-2 through 9-17.

Comment 8-2

PROJECT TRAFFIC
In order to develop the weekday peak-hour vehicle trip estimates for the proposed Project land use, the General Office Building land use code was utilized from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). The ITE manual describes a General Office Building as "a location where affairs of businesses, commercial or industrial organizations, or professional persons or firms are conducted. An office building houses multiple tenants that can include, as examples, professional services, insurance companies, investment brokers, a banking institution, a restaurant, or other service retailers." Given that the Project would house a single tenant, it would not be considered a General Office Building housing multiple tenants. The Project would be a single-tenant office building, with Apple Inc. utilizing 100 percent of the 536,000 square feet of office floor area. Therefore, the more appropriate ITE land use code to use for vehicle trip estimation is Single Tenant Office Building, which ITE defines as an office building that "generally contains offices, meeting rooms, and space for file storage and data processing of a single business

or company and possibly other service functions including a restaurant or cafeteria." A comparison of the vehicle trip generation rates between the General Office Building and Single Tenant Office Building land use codes shows that single-tenant office buildings generate vehicle trips at higher rates than general office buildings, whether based on office floor area or number of employees, during both the weekday AM and PM peak hours. The use of the General Office Building vehicle trip rates in the TIS, therefore, understates Project impacts in both the CEQA and non-CEQA transportation analyses.

Response to Comment 8-2

This comment suggests that the use of the General Office Building land use for the Transportation Impact Study understates Project impacts for both the CEQA and non-CEQA transportation analyses. Fehr & Peers, with City approval, selected trip generation rates from the "Dense Multi-Use Urban" setting for ITE Code 710 "General Office Building" based on the Project's location in an established, dense urban environment with a walkable, bikeable, and high-quality transit network surrounding the Project Site. The Code 710 Dense Multi-Use Urban trip rates are based on observations of offices located in environments with high quality walking, biking, and transit access. The Project is located immediately adjacent to a major transit hub with several frequent (more often than every 15 minutes throughout the day) lines serving all directions. Although it is true that the proposed office building would be occupied solely by Apple Inc., trip generation rates for ITE Code 715 Single Tenant Office are based only on "general urban/suburban" observations which are not as representative for this development environment. Offices in general urban/suburban areas have higher vehicle trip generation not primarily because there is a single business occupant, but because these locations have generally poor access to transit and few opportunities to walk or bike to and from the office compared with dense urban areas like this portion of Culver City.

Comment 8-3

Further, the Draft EIR indicates that the proposed single-tenant office buildings will include 536,000 square feet of gross floor area and be designed to accommodate 2,400 employees. Given that office land use vehicle trips correlate better with number of employees than the amount of gross floor area, number of employees is the more accurate and conservative independent variable to use for the estimation of proposed Project vehicle trips.

Response to Comment 8-3

This comment suggests that as vehicle trips better correlate with the number of employees rather than the amount of gross floor area, the number of employees is the more accurate and conservative independent variable to use for the estimation of Project vehicle trips. As noted in Response to Comment 9-2, above, Fehr & Peers' professional opinion is that ITE Code 715 is not as representative of a trip generation category for the Project context. While the proposed office building is designed to accommodate 2,400 employees, this does not necessarily equate to the anticipated daily trip activity, especially under post-pandemic conditions where many employees may continue to use remote or hybrid work schedules. Furthermore, the most appropriate ITE land use code, 710, does not provide a per employee trip generation rate. Therefore, gross floor area is considered to be a more appropriate variable for this Project.

Comment 8-4

In addition, the TIS took existing use vehicle trip credits for 51,500 square feet of office space and 24,600 square feet of furniture retail space presumed to be active on the Project site. However, the report describes the furniture retail space as being active prior to October 2020, while the traffic volume counts for the study intersections and street segments were collected in March and May 2022. As such, vehicle trips from the inactive furniture retail space were not present during collection of the 2022 traffic counts, and no trip deductions for this prior use should have been assumed in the Project trip generation calculations. Use of empirical data to determine the existing use traffic volumes would be preferred, as the primary existing use driveway was counted as part of the May 2022 data collection.

Response to Comment 8-4

This comment suggests that the Transportation Impact Study inaccurately took credit for the furniture retail use on the Project Site that was inactive at the time of the traffic counts conducted in March and May 2022. This is a minor oversight that has been revised in the Transportation Impact Study. Removing this existing land use credit would result in only 4 new trips in the AM peak hour and 9 in the PM peak hour, which would have only an incremental effect on the LOS analysis and is not a CEQA issue. The updated net new Project trips are 407 in the AM peak hour 421 in the PM peak hour. The updated pages to the Transportation Impact Study which reflects this incremental change in trips are provided in Chapter 3, *Revisions, Clarifications*, *s and Corrections to the Draft EIR*, of this Final EIR. As shown therein, the revisions do not affect Chapter 3, CEQA Transportation Analyses, of the Transportation Impact Study. The revisions only nominally affect limited traffic data in Chapter 4, Non-CEQA Transportation Analysis, of the Transportation Impact Study. The changes to the Transportation Impact Study do not affect the transportation analysis included in Section 4.12, *Transportation*, of the Draft EIR. The changes made to the TIS do not provide significant new information resulting in a new impact or substantial increase in the severity of an impact and as such, does not require recirculation per CEQA Guidelines Section 15088.5.

Comment 8-5

It is requested that a more refined, intersection-level Project trip distribution pattern be provided for the Project. The trip distribution pattern provided in Figure 7 (page 45) of the TIS does not provide the level of detail suitable for an in-depth review of inbound and outbound turning movement assumptions at area intersections.

Response to Comment 8-5

This comment requests that a more refined, intersection-level Project trip distribution pattern be provided for the Project. The Transportation Impact Study includes Project-only volume figures immediately following Figure 7 (see on pages 46 and 47) which allow a reader to review the detailed inbound and outbound turning movement assumptions at all study intersections.

Comment 8-6

INTERSECTION AND SEGMENT OPERATIONS ANALYSES

Per the City of Culver City *Transportation Study Criteria and Guidelines* (TSCG) adopted in July 2020, analyses of signalized and non-signalized intersections in transportation studies shall be conducted using the latest version of the Highway Capacity Manual (HCM) published by the Transportation Research Board (TRB). Recent versions of the HCM were released earlier this year (2022), in 2016, and in 2010. While the Project TIS report indicates that the Synchro software and 2016 version of the HCM were used for intersection analyses, the TIS appendices show that the 2000 version of the HCM was used for the majority of the study intersection analyses (8 of 13). No explanation is provided for the use of a 22-year-old version of the HCM for the analysis of a majority of the study area.

Response to Comment 8-6

This comment calls into question the use of the Highway Capacity Manual (HCM) 2000 methodology. Although the HCM 2000 methodology is becoming dated, there are certain intersection conditions for which newer HCM methodologies cannot easily or accurately be applied. Newer HCM methodologies, beginning with HCM 2010, have changed how intersection delay is calculated by allowing for more variables related to signal timing and other modes such as bicycling and walking. However, the trade-off with newer versions of the HCM is that it is unable to account for some more complex traffic signal phasing implementations or lane configurations. In the Synchro software used for this analysis, the HCM 2010 methodology cannot be applied to intersections with more than four approaches (e.g., Venice Boulevard & Robertson Boulevard/Exposition), nor to intersections with exclusive pedestrian phases or "non-NEMA" phasing which affects numerous intersections along Washington Boulevard which incorporated transit signal priority phasing and bicycle signals as part of the MOVE Culver City project. However, the HCM 2000 edition is still a valid method for analyzing these intersections as it captures the major variables affecting traffic delay which are the signal phases, signal cycle length, intersection capacity, and volume, to report overall intersection delay and allows for estimation of approach delays and queues. It is also the methodology selected by the Culver City, as lead agency. It would also be possible to analyze some of these intersections under HCM 2010 or newer by inputting signal timing that would be compatible with the HCM 2010 methodology, but does not reflect the actual configuration, which does not necessarily produce a more accurate result simply by applying a more recent edition of the methodology. Culver City staff and Los Angeles Department of Transportation (LADOT) staff reviewed and accepted the analysis as presented.

Furthermore, intersection delay analysis is not a CEQA issue and is included in the Transportation Impact Study per the Transportation Study Criteria and Guidelines (TSCG) and LADOT Transportation Assessment Guidelines (TAG) to inform the City of non-CEQA issues related to traffic operations efficiency that can be addressed through signal timing adjustments and re-striping, and to identify the need for non-motorized and non-capacity-enhancing alternative strategies around the Project Site.

Comment 8-7

In terms of accurately describing existing traffic operations and forecasting future traffic operations at intersections in the vicinity of the Project site, the Synchro software has limitations. Intersections are analyzed as stand-alone facilities within Synchro and do not account for the effects of nearby intersections and downstream congestion. As described in the approved Memorandum of Understanding (MOU) included as Appendix A to the TIS, it was assumed "that the intersection analysis will require microsimulation in the immediate vicinity of the Project site to correctly evaluate the closely-spaced intersections and new geometric and signal changes that have taken place since 2019." Given the high level of congestion in the Project area, especially for westbound and eastbound traffic along the Venice Boulevard/Washington Boulevard corridors during the weekday AM and PM peak hours, respectively, a microsimulation analysis is necessary to accurately determine traffic operations and Project impacts. However, no microsimulation analysis is included in the TIS.

Response to Comment 8-7

This comment suggest that use of the Synchro software has limitations, and a microsimulation analysis is necessary to accurately determine traffic operations and Project impacts. It is correct that Synchro and any other deterministic method for analyzing intersection operations does not fully account for the effects of nearby intersections and downstream congestion, which are better accounted for using a stochastic method such as microsimulation. During the study, Fehr & Peers did conduct microsimulation analysis around the Project Site to supplement their findings and facilitate further development of the Project access plan. Microsimulation analysis is not included in the Transportation Impact Study for two reasons. First, it would have been impossible to accurately calibrate the simulation model with the information available at the time. Conducting a microsimulation, like the response above about the use of various HCM methods or even selecting a trip generation rate, is not as simple as performing the task and getting a "right" answer. Microsimulation is not the most appropriate method of analysis if a model cannot be reasonably calibrated to reflect existing or baseline conditions. Without this calibration, the results of any future analysis including the effects of the project would be questionable. When the study was initiated, the MOVE Culver City project was only just being installed and Culver City was planning (but had not implemented) an update to traffic signal timing throughout the area. Secondly, conducting the microsimulation exercise with the data available did lead to a follow-up discussion with Culver City staff to identify a concern that because the fundamental traffic network had changed as a result of the MOVE Culver City project, it was unreasonable to expect that traffic patterns would remain the same as demand began to return. This led to a request to and approval from the City to gather new counts in May 2022 to reflect the recent "hybrid" return to work many employers in the area had enacted, which better reflects how travel patterns have settled after two years of the pandemic. The City of Culver City approved this methodology for the TIS. With new counts showing substantially lower volumes, and the City still developing an updated signal timing plan for Washington Boulevard, further microsimulation analysis would not have affected the CEQA analysis of impacts. For non-CEQA purposes, the Transportation Impact Study is clear that the Project trips would have a substantial effect on delay at certain intersections.

Comment 8-8

Additionally, existing and future transportation analyses in the TIS were performed assuming that the MOVE Culver City Downtown Corridor project will be a permanent fixture along Washington Boulevard. Given that the mobility lane project is in the pilot phase and is not guaranteed for implementation in the future, analyses without and with the mobility lane project should be provided.

Response to Comment 8-8

This comment suggests that analysis with and without the Culver City Downtown Corridor project should have been conducted as part of the transportation study. Culver City staff gave the direction to assume the MOVE Culver City project would remain in place in the future for the purpose of the Transportation Impact Study, which is consistent with the desire to be "conservative" by assuming less capacity available for cars. While it is true that the MOVE Culver City project is technically in a pilot phase, given the project's alignment with Culver City's other goals it is a reasonable assumption that the MOVE Culver City project will remain a permanent fixture. This is also consistent with the shift in State law and CEQA thresholds to encourage multi-modal travel alternatives. Traffic congestions and intersection capacity is no longer a CEQA issue. The City did not require a non-CEQA intersection LOS analysis without the mobility lane project.

Comment 8-9

A detailed analysis should be provided of the Project's potential impacts to land uses and businesses that take access and deliveries from Washington Boulevard, along the roadway segments west and east of National Boulevard. These segments are currently affected by the MOVE Culver City Downtown Corridor project and would be most impacted by the Project's added vehicular traffic. If the Project is expected to add vehicle trips to segments of Washington Boulevard that presently have constrained access/egress conditions for neighboring properties, the Project should provide appropriate improvement measures to maintain adequate access/egress for these neighboring properties. Heavy vehicle access should be evaluated for neighboring properties, as well. The analysis should determine if the cumulative impact of the Downtown Corridor project roadway modifications, Project traffic, and related project traffic would impede heavy vehicle access to neighboring properties along Washington Boulevard. Vehicle queuing analyses should be performed at neighboring property driveways along these segments of Washington Boulevard, to ensure that expected vehicle congestion and queuing do not hinder vehicles from entering and exiting neighboring properties.

Response to Comment 8-9

This comment suggests that a detailed analysis should have been provided of the Project's potential impacts to land uses and businesses that take access and deliveries from Washington Boulevard. The analysis in the Transportation Impact Study disclosed the cumulative effects of Project traffic inclusive of the MOVE Culver City project along Washington Boulevard and the detailed intersection level of service reports were available to inform stakeholders of estimated changes at each study location, which includes much of Washington Boulevard. The Project would not alter

driveway access to land uses and businesses along Washington Boulevard. In addition, traffic delay, vehicle queuing and neighboring site access are not CEQA issues.

Comment 8-10

It is also worth noting that the approved MOU included as Appendix A to the TIS describes a study area with 22 intersections. However, the Project TIS limits the study intersection analysis to only 13 intersections. The reasoning for the reduction in intersections is not provided. It is also noted that *net* Project turning movement volumes (proposed minus existing) were analyzed at the proposed Project driveway intersections, when the analysis should have been for *proposed* Project turning movement volumes. The Project driveway intersections should be analyzed using the vehicle trips labeled "TOTAL DRIVEWAY TRIPS" in Table 8 (page 44) of the TIS.

Response to Comment 8-10

This comment notes that the number of study intersection in the Memorandum of Understanding (MOU) and the number of study intersections analyzed in the Transportation Impact Study differ. Note that the City agreed to reduce the number of intersections following preparation of the MOU. Originally, the City required a larger number of study intersections that was not consistent with the objectives of the TSCG and covered intersections well beyond the Project area, whereas the purpose of the non-CEQA traffic operations analysis is to identify localized effects where Project traffic is concentrated. Culver City agreed to the reduction in study intersections based on a memorandum from Fehr & Peers dated April 27, 2022. Note that the Transportation Impact Study provided in the Draft EIR erroneously omitted this memorandum. The Transportation Impact Study has been updated to include this memorandum, and the revised Transportation Impact Study is included in Updated Appendix M of this Final EIR.

The commenter is correct that the net Project trip generation was erroneously applied at Project driveway locations and a revised analysis has been prepared and included in the revised Transportation Impact Study, provided in Updated Appendix M of this Final EIR.

Note that study locations are used for the purpose of measuring vehicle delay, which is not a CEQA issue, The number of study locations does not affect the impact analysis or conclusions included in Section 4.12, *Transportation*, of the Draft EIR.

Comment 8-11

The Project neighborhood street segment analysis indicates that the Project is expected to contribute a non-negligible number of vehicle trips to only one neighborhood street segment (Hutchison Avenue, between Venice Boulevard and Washington Boulevard). One neighborhood street segment seems like a low number, and provision of a more refined Project trip distribution pattern (see above) would go a long way in explaining the choice is neighborhood street segments for analysis. It is also worth noting that the Project comes very close to creating a significant condition on Hutchison Avenue (Project-related increase in daily volume of 11.9 percent where the significance threshold is 12.0 percent), and this is based on the use of less-than-conservative Project vehicle trip assumptions.

Response to Comment 8-11

This comment suggests that a more refined Project trip distribution pattern would serve to provide a more informed Project neighborhood street segment analysis. Hutchison Avenue was selected for neighborhood street analysis under the base Project access plan because it is the only street that has the potential to benefit Project-related egress by reducing travel times. Under the base Project access, drivers can only exit the site by making a right turn onto National Boulevard or onto Venice Boulevard. Any drivers whose ultimate destination is to the south or west of the site would need to turn around; some trips are assumed to make a U-turn on Venice Boulevard at Helms Avenue, while others would turn right onto Hutchison Avenue to Washington Boulevard and then either continue straight on Washington or turn onto National Boulevard. For site access (ingress), there are no neighborhood streets which provide a clear benefit for drivers based on the right-in driveway locations. The comment correctly notes that the Project effect was estimated to be close to the threshold, as is clearly disclosed in the analysis. Note that the neighborhood street volume analysis is not a CEQA issue and do not affect the impact analysis or conclusions included in Section 4.12, *Transportation*, of the Draft EIR.

Comment 8-12

TRANSIT OPERATIONS

The description of existing transit service in the Project study area is based on conditions prior to the COVID- 19 pandemic and, therefore, does not provide an accurate assessment of current transit service. While on its face this dated description may appear to have no bearing on the TIS findings, the use of pre-pandemic transit service levels may be used to:

- Justify the use of lower-than-appropriate vehicle trip generation rates associated with the Dense Multi-Use Urban setting per the ITE *Trip Generation Manual*
- Overstate the effectiveness of transit-related Transportation Demand Management (TDM) measures

Response to Comment 8-12

This comment suggests that the description of existing transit service in the Project study area is based on conditions prior to the COVID- 19 pandemic and, therefore, does not provide an accurate assessment of current transit service. While the transit service described in the Transportation Impact Study is based on conditions prior to the COVID-19 pandemic, the study area has consistently been and remains an area with frequent, high quality transit service, even through the pandemic when some line frequencies were temporarily reduced due to low ridership. Between the Los Angeles County Metropolitan Transportation Authority (Metro) E Line light rail and many bus routes with less than 15-minute headways serving multiple directions around the Project Site, the overall quality of the current transit service remains high. Transit service continues to adapt to changing circumstances, but no agency in this study is publicly planning for a permanent reduction in service to below 2019 levels; rather, all are striving to return service levels to pre-pandemic conditions, and some have accomplished this already. Metro had actually intended to improve bus frequency as part of its NextGen service restructuring, which would have produced even better transit service on Line 33 than was operating in 2019 levels. Based on published schedules available on September 12, 2022, the Metro E Line, Metro Line 33, and Culver City Line 1 are operating at

least every 15 minutes or better throughout the day; these are just a few examples of the rail and bus routes available immediately adjacent to the Project.

Comment 8-13

The Project TIS identified potential substantial issues for transit service along Venice Boulevard, specifically to Metro Local Line 33, due to the addition of Project transit trips. However, no improvement measures were proposed for the Project, as is recommended in the City of Culver City TSCG. It should also be noted that the "transit" trips evaluated in the Project TIS are actually transit vehicle-trip equivalents, per the Project trip generation calculations in Table 8 (page 44) of the TIS. These transit vehicle-trip equivalents should be converted to transit person trips to provide an accurate transit analysis of Project impacts.

Response to Comment 8-13

This comment questions why no improvement measures were proposed for the Project as it relates to potential issues for transit service along Venice Boulevard. On page 79, the Transportation Impact Study identifies that the delay effect on Metro Line 33 could be solved through the implementation of the City of Los Angeles' Mobility Plan strategy for Venice Boulevard, which includes implementation of a bus lane and states that the intent of the Mobility Plan is not for individual projects to implement these actions, nor would implementation just in the vicinity of the project necessarily solve the cumulative delay the route would experience.

Assuming an average vehicle occupancy of 1.1 for typical office uses would result in a 10 percent increase in transit riders. This results in a total of 165 AM riders and 171 PM riders. These additional calculated riders represent an incremental increase compared to what was originally stated and would not change the conclusions of the Transportation Impact Study.

Note that transit service delays and passenger capacity are not CEQA issues and do not affect the impact analysis or conclusions included in Section 4.12, *Transportation*, of the Draft EIR.

Comment 8-14

SITE DESIGN AND OPERATION

We have concerns about the close spacing of the Project's proposed driveways on Washington Boulevard and National Boulevard to the adjacent signalized intersections (at Wesley Street and Ivy Station, respectively). The TIS should explain better how these driveways will operate in conjunction with these existing signalized facilities.

Response to Comment 8-14

This comment notes concerns about the close spacing of the Project's proposed driveways on Washington Boulevard and National Boulevard to the adjacent signalized intersections (at Wesley Street and Ivy Station, respectively). The Project driveways on Washington Boulevard and National Boulevard are existing driveways, although the Project would substantially increase the peak use of these driveways and discontinue the driveway access at the now-signalized Ivy Station intersection on National Boulevard. Although these driveways are very close to signalized intersections, both are proposed to only permit right turns into the Project Site, and the National

Boulevard driveway would also permit right turns out of the Project Site. Prohibition of left turns in and out of both driveways prevents potential operational and safety conflicts with the neighboring intersections.

Culver City staff also requested analysis of several access alternatives which are described in Appendix F of the Transportation Impact Study, in part to address the proximity of the base proposed Project driveways to neighboring signalized intersections. One access alternative removes the Washington Boulevard driveway entirely and creates a new signalized intersection at the proposed Venice Boulevard driveway to permit left turns into and out of the site. Another access alternative considers replacing the right-in/right-out driveway on National Boulevard by using the existing driveway at the signalized Ivy Station intersection, as well as in conjunction with closing the Washington Boulevard driveway. Appendix F of the Transportation Impact Study provides a qualitative review of the effects of these changes on both CEQA and non-CEQA issues.

Comment 8-15

In addition, more detail is requested on the design and function of the eastern alley that would provide driveway connections to Washington Boulevard and Venice Boulevard. The driveway level of service (LOS) analysis in the Project TIS shows that average delays for northbound vehicles turning right from the Venice driveway to Venice Boulevard will exceed three minutes per vehicle during the weekday PM peak hour under Horizon Year conditions. Can the vehicle queuing associated with these considerable delays be accommodated on the eastern alley? Will queues extend into the Project parking structure? Will Helms Bakery traffic utilize this alley and has that traffic been accounted for in the analysis? A more complete picture of how the parking structure, eastern alley, and driveway to Venice Boulevard will function must be provided.

Response to Comment 8-15

This comment requests more detail on the design and function of the eastern alley that would provide driveway connections to Washington Boulevard and Venice Boulevard. The eastern alley of the Project Site, as shown Figure 2-3 of the Draft EIR, would be a new vehicular area immediately abutting the existing Helms alley to the east. The Applicant has been coordinating with the abutting Helms Bakery property owner on the conceptual design of the shared alley space to provide an on-site circulation plan that works for both properties. That design is not yet finalized, but will be done so in cooperation with the Helms Bakery property owner. Additionally, Appendix F of the Transportation Impact Study addresses three additional Project access alternatives as described in Response to Comment 9-14, above, one of which would further reconfigure the proposed Project Site alley jointly with the abutting property to operate as a signalized intersection. The Project would not physically alter or obstruct the existing Helms alley, and therefore the existing alley traffic would continue to use its own space. Note that internal site circulation and level of service is not a CEQA issue and does not affect the impact analysis or conclusions included in Section 4.12, *Transportation*, of the Draft EIR.

Comment 8-16

FREEWAY SAFETY ANALYSIS

As part of the CEQA transportation analysis, a Freeway Safety Analysis was performed for the Project. It is noted that the safety analysis evaluated three State of California Department of Transportation ("Caltrans") freeway off-ramp connections to the local surface street system. All three of the off-ramps were westbound off-ramps of the Interstate 10 (I-10) Freeway. Why were no eastbound off-ramps analyzed? The analysis of the I-10 Freeway/Robertson Boulevard Interchange does not appear to consider the extreme congestion in the area caused by traffic spillback on Robertson Boulevard, Robertson Place, Exposition Boulevard, National Boulevard, Ellis Avenue, and Venice Boulevard. The inefficiencies in circulation caused by the outdated design and extreme peak-period congestion on these facilities and the surrounding study area must be addressed as a part of the CEQA and non-CEQA operations and safety analyses.

Response to Comment 8-16

The commenter questions why no eastbound off-ramps were analyzed. As stated in the Transportation Impact Study, the Freeway Safety Analysis is a requirement of LADOT which has a specific threshold of 25 or more vehicle trips to trigger the need for analysis. Based on the traffic distribution, there are 18 Project trips exiting the freeway at the Robertson Boulevard ramp in the AM peak hour, and fewer in the PM peak. LADOT's guidance and CEQA do not require the Project to address the "outdated design" of the local road interface with the freeway off-ramps, which are part of the existing without project conditions that comprise the environmental baseline for the analysis.

Comment 8-17

SUMMARY

As outlined above, we have concerns about the depth of the Project's transportation impact analysis. The Project has been identified to have potentially substantial adverse effects to local intersections, neighborhood street segments, and transit operations. Yet, the Project proposes little in the form of mitigation and improvement measures. Even the voluntary TDM program's influence is nebulous, with no quantified reductions in vehicle trips, queuing, delay, and impacts to local businesses including access/egress to their properties for customers and deliveries. With the potential to have such a deleterious effect on mobility in an already constrained area, a more expansive set of improvements should be provided that is supported by calculated results.

Response to Comment 8-17

This comment provides a general conclusion regarding the comments raised in this letter. Refer to the Responses to Comments 8-2 through 8-16 above. As described above, the trip generation category selected reflects the built environment that would support a high proportion of transit use and other modes. The voluntary TDM program could further encourage people to make non-automotive trips, but related to earlier comments about offering a "conservative" analysis, F&P's and the City's professional judgment is that the use of dense urban/mixed-use office trip generation is the most appropriate for the location of this development and analyzing even further reductions would not be conservative.

Letter 9

South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Received September 6, 2022

Comment 9-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Culver City is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction.

Response to Comment 9-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Response to Comments 10-2 through 10-5.

Comment 9-2

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of demolition of single-story warehouses and surface parking lots and construction and operation of two buildings with subterranean parking totaling approximately 536,000 square feet on an approximately 4.46-acre site.[1] The Proposed Project is located on the northeast corner of National Boulevard and Washington Boulevard in the City of Culver City and in the City of Los Angeles. A Phase I Environmental Site Assessment (ESA) noted that a former gasoline service station site is located within 200 feet of the Proposed Project and that the former gasoline service station site was investigated and remediated for fuel that leaked from tanks.[2] Construction of the Proposed Project is anticipated to begin in the first quarter of 2023 and last approximately three years.[3]

1 Draft EIR. Executive Summary. Page ES-1.
2 *Ibid.* Hazardous and Hazardous Materials. Page 4.7-20.
3 *Ibid.* Project Description. Page 2-18.

Response to Comment 9-2

This comment provides an accurate summary of the Project. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 9-3

South Coast AQMD Staff's Comments on the Draft EIR

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities During Construction

Based on the Hazards and Hazardous Materials Section in the Draft EIR, Phase I ESA site investigation results indicated that elevated concentrations of components of gasoline and

perchloroethylene (PCE) have been detected in the groundwater at the former gasoline service station site near the Proposed Project site and that such contamination has reportedly migrated generally to the Proposed Project site.[4] Soil sampling investigations were thus conducted at the Proposed Project site to evaluate current conditions. This process showed that soil at the Proposed Project site may contain concentrations of gasoline components and PCE that are above the acceptance criteria for a receiving site or disposal facility.[5] To accommodate the subterranean parking for the Proposed Project, during construction fill and soil would be excavated and removed from under the current buildings to a depth of about 50 feet. Such soil would then be reused or disposed of offsite.[6] It is unclear in the Draft EIR, however, if the Lead Agency completely analyzed air quality impacts from such soil cleanup activities.

4 *Ibid.* Hazardous and Hazardous Materials. Page 4.7-19 through 4.7-20.
5 *Ibid.* Page 4.7-23 through 4.7-25.
6 *Ibid.* Page 4.7-25.

Response to Comment 9-3

This comment states that it is unclear if the Draft EIR completely analyzed air quality impacts from soil cleanup activities.

As discussed under Section 4.7, *Hazards and Hazardous Materials*, page 4.7-24, of the Draft EIR, testing revealed the presence of PCE in sub-slab soil vapor samples in the northern portion of the Project Site (beneath Venice Boulevard buildings) at concentrations above its vapor intrusion screening level for commercial land use. Follow-up indoor air sampling did not identify PCE or other VOCs at concentrations above their respective screening levels for commercial land use, although PCE was detected at measurable concentrations below screening levels for commercial land use in indoor air samples at the northern portion of the Project Site. The soil removed from the excavation would be reused or disposed of at an appropriate offsite location following sampling and characterization.

Based on the sampling conducted to date, the soil from the northern portion of the Project Site may contain PCE, and soil from the southern portion of the Project Site may contain benzene, toluene, ethylbenzene, xylenes, and naphthalene at concentrations above the acceptance criteria for the receiving site or disposal facility, depending on the acceptance criteria of the receiving facility. Although a few of the soil vapor readings were above commercial land use screening levels, it does not necessarily mean that the soil is contaminated. Indoor air sampling did not identify PCE or other VOCs at concentrations above their respective screening levels for commercial land use, which suggests that the chemicals are not coming from the soils but from the off gassing of chemicals from groundwater beneath the Project Site.

As discussed on page 4.7-24 of the Draft EIR benzene, toluene, ethylbenzene, xylenes, and naphthalene, all components of fuel, were detected in groundwater generally in the southern/southeastern portion of the Project Site at concentrations above their respective Maximum Containment Levels (MCLs). Note that these compounds were not detected in the soil vapor samples at concentrations above their respective regulatory vapor intrusion screening levels for commercial land use, which suggests that the chemicals are not coming from the soils but from the off gassing of chemicals from groundwater beneath the Project Site. Additionally, as indicated on

the Azusa Land Reclamation Landfill website (refer to https://www.wmsolutions.com/locations/details/id/181), this landfill accepts construction & demolition debris, as well as contaminated soils and special wastes. The transport of materials to the Azusa Land Reclamation Landfill was considered in the construction modeling assumptions and is reflected in the air quality construction emissions provided in Section 4.2, *Air Quality*, of the Draft EIR.

However, in response to this concern from the commenter and for a conservative analysis, should soil be found to include contaminants above the Total Threshold Limit Concentration (TTLC) and not be allowed to be disposed of at the Azusa Land Reclamation Landfill, the analysis in Section 4.2, *Air Quality*, of the Draft EIR has been conservatively revised to assume that some hazardous soils would need to be hauled to a Class I landfill facility. These revisions have been made to Chapter 3, *Revisions, Clarifications*, *and Corrections to the Draft EIR*, of this Final EIR and further discussion is provided below.

If any soils with contaminants above the TTLC are found during excavation, the materials would be hauled to the Kettleman Hills Hazardous Waste Facility, located at 35251 Old Skyline Rd, Kettleman City, CA 93239. The Kettleman Hills Hazardous Waste Facility is located approximately 182 miles from the Project Site. This would require haul trucks to travel approximately 70 miles within the South Coast Air Basin and 112 miles in the San Joaquin Valley Air Basin. Accordingly, this would require haul trucks to travel 40 more miles in the South Coast Air Basin than the assumptions in the Draft EIR, which assumed 30 miles to the Azusa Land Reclamation Landfill. Preliminary soil data within the Soil Pre-Characterization Survey for Disposal, prepared by EKI in September 2022 (included in Appendix D of this Final EIR) indicates approximately 75 cubic yards of material could potentially contain hazardous materials above the applicable TTCL limits. If hazardous materials above the applicable TTCL limits are found, approximately 1 to 2 trucks per day would be required to transport the material to the appropriate receiver location. Assuming 2 haul trucks would travel to the Kettleman Hills Hazardous Waste Facility per day, these haul truck trips would add about 0.90 pounds (lbs)/NOx per day. Given that the maximum emissions for NOx generated under Project construction is 92 lbs/NOx per day, the additional 2 haul truck trips at 40 miles per trip would increase maximum emissions to 93 lbs/NOx per day. As such, even with the increased mileage, the 100 lbs/day threshold for NOx during construction excavation would not be exceeded. See Appendix E of this Final EIR for the supplemental air quality calculations related to haul trucks travelling to the Kettleman Hills Hazardous Waste Facility. The increase in maximum daily emissions of other ozone precursor and criteria air pollutants (VOC, CO, SO_2, PM10, and PM2.5) would also be similarly negligible in magnitude and would not result in a material change or increase in emissions or result in a new significant impact that has not been previously identified in the Draft EIR. In addition, regarding the emissions occurring in the San Joaquin Valley, which are based on a per year threshold, assuming up to 16 total trucks (10 cy capacity trucks with 16 inbound + 16 outbound), emissions of NOx would be nominal. Approximately 0.02 tons per year is estimated to be emitted, which is less than the 10 tons per year threshold under the San Joaquin Valley Air Pollution Control District (SJVAPCD). The increase in maximum daily emissions of other ozone precursor and criteria air pollutants (VOC, CO, SO_2, PM10, and PM2.5) would also be similarly small in magnitude and would be well below the SJVAPCD annual significance thresholds. The increase in GHG emissions

and transportation fuel would also be similarly small in magnitude and would not result in GHG emissions that would have a significant impact on the environment or conflict with applicable GHG reduction plans, policies, and regulations or result in the wasteful, inefficient, or unnecessary consumption of energy or conflict with applicable plans for renewable energy or energy efficiency. As such, assuming some haul truck trips would be required to travel to the Kettleman Hills Hazardous Waste Facility, emissions from this extended mileage would still be under the respective thresholds for SCAQMD and SJVAPCD.

Comment 9-4

Since cleanup activities could include the removal and disposal of contaminated soil, and depending on the type of contamination, contaminated soil may not be accepted at the landfill site 30 miles away from the Proposed Project site,[7] such soil may need to be disposed of at a permitted hazardous disposal facility outside Los Angeles County with a one-way truck trip length that is longer than 30 miles. If it is reasonably foreseeable at the time of the release of the Draft EIR that the Proposed Project would likely involve remediation of contaminated soil, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of any reasonably foreseeable soil remedial or mitigation activities, quantify emissions from those activities, and include those emissions in the Proposed Project's regional construction emissions profile to be compared to South Coast AQMD's regional air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. If those emissions are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. If the reason for not including them in the Final EIR is because remedial or mitigation measures have not been fully developed or approved prior to the certification of the Final EIR, the Lead Agency should commit to evaluating the air quality impacts from those activities through a CEQA process when the measures become known and prior to allowing the commencement of any soil remedial or mitigation activities at the Proposed Project.

[7] *Ibid.* Air Quality. Page 4.2-41.

Response to Comment 9-4

Refer to Response to Comment 9-3 above, which states that preliminary soil data indicates that soils material on-site could potentially contain hazardous materials above the applicable TTCL limits. As such, air quality modeling assumptions have been conservatively updated to account for potential haul truck trips to the Kettleman Hills Hazardous Waste Facility. As analyzed, emissions from this extended milage would still be under the respective thresholds for SCAQMD and SJVAPCD and would not result in new or substantially increased air quality impacts compared to those evaluated in the Draft EIR.

Comment 9-5

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, when the Lead Agency's position is at variance with recommendations raised in

the comments, the issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Response to Comment 9-5

This comment provides a general conclusion as well as additional information regarding the South Coast Air Quality Management District (SCAQMD). The Lead Agency will provide the SCAQMD with written responses to all comments prior to the certification of the Final EIR. The issues raised by the SCAQMD were addressed in detail and in good faith. This comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Letter 10

UNITED HERE Local 11
801 South Grand Avenue, 11th Floor
Los Angeles California, 90017
Received September 6, 2022

Comment 10-1

On behalf of UNITE HERE Local 11 ("**Local 11**"), this office respectfully provides the following comments[1] to the City of Culver City ("**City**") with regard to the Draft Environmental Impact Report ("**DEIR**") for the proposed demolition of three existing warehouse structures totaling 105,047 square feet ("**sf**") and the proposed construction of a two-structure, 536,000-sf office complex ("**Project**") located on a 4.46-acre site with split-jurisdiction ("**Site**") intended to be occupied by Apple Inc. (DEIR, p. 2-1-2-2.) The Project includes a four-story (56'), 167,000-sf office building on a 1.63-acre parcel under the City's jurisdiction ("**Culver City Parcel**"); and a five or six- story (56' – 75'), 369,000-sf office building on a 2.83-acre parcel under the City of Los Angeles jurisdiction ("**Los Angeles Parcel**").[2]

In furtherance of the Project, Culver Crossing Properties, LLC ("**Applicant**") is seeking various project approvals under the Culver City Municipal Code ("**CCMC**"), including approvals for Planned Development; a Comprehensive Plan; extended Hours of Construction; and various other project approvals under the Los Angeles Municipal Code ("**LAMC**"), including a boundary change to the Expo TNP; Amendment of the CPIO; Site Plan Review; Waiver of Dedication; and Tree Removal Permit (collectively "**Entitlements**"). (See DEIR, pp. 2-24.) Additionally, for the California Environmental Quality Act ("**CEQA**"),[3] the Environmental Impact Report and associated approvals ("**EIR**")[4] will be considered for adoption by both the City (as lead agent) and the City of Los Angeles (as a responsible agent).

1 Herein, page citations are either the stated pagination (i.e., "**p. #**") or PDF-page location (i.e., "**PDF p. #**").
2 For purposes of CEQA, the City of Los Angeles is serving as Responsible Agency.
3 Including "**CEQA Guidelines**" codified at 14 Cal. Code. Regs. § 15000 et seq.
4 Inclusive of Draft EIR ("**DEIR**") and all associated appendices ("**APP-##**") retrieved from https://www.culvercity.org/City-Projects/G-Planning-Projects.

Response to Comment 10-1

This comment provides an accurate summary of the Project and the approval being sought. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 10-2

In short, the Project has a significant energy impact by failing to provide feasible onsite renewable energy. Additionally, adding this Project to existing office space by the same tenant (Apple, Inc.) will turn an entire city block into what Local 11 believes may be an underutilized, over-parked, single-tenant office district—contrary to sound mixed-use smart growth principles. If the City is serious about making strides toward its housing obligations, it needs to prioritize genuine mixed-

use projects with housing. So too, the DEIR fails to identify significant greenhouse gas ("**GHG**") impacts.

For these reasons, Local 11 respectfully asks the City not to grant the Entitlements and EIR (collectively "**Project Approvals**") until the issues discussed herein are addressed in a CEQA-compliant EIR that includes additional mitigation measures that reduce the Project's impact on energy, GHG, and housing impacts.

Response to Comment 10-2

This comment provides a general introduction to the comments raised in this correspondence and it expresses the commentors opposition to the Project Approvals. Responses to the specific comments raised are provided below in Response to Comments 11-3 through 11-16.

Comment 10-3

I. LOCAL 11'S STANDING

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix—including *thousands of members who live and/or work in the City and the City of Los Angeles*. The union has a First Amendment right to petition public officials in connection with matters of public concern, including compliance with applicable zoning rules and CEQA, just as developers, other community organizations, and individual residents do. Protecting its members' interest in the environment, including advocating for the environmental sustainability of development projects and ensuring the availability of housing and hotels (in compliance with state and local rules), is part of Local 11's core function. Recognizing unions' interest and union members' interest in these issues, California courts have consistently upheld unions' standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) Furthermore, Local 11 has public interest standing to challenge the Project Approvals given the City's public duty to comply with applicable zoning and CEQA laws, which Local 11 seeks to enforce. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; Weiss v. City of Los Angeles (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

Response to Comment 10-3

This comment provides a general introduction to commenter's client (UNITE HERE Local 11) and their right to litigate land use and environmental claims. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 10-4

II. SPECIFIC PROJECT/DRAFT EIR COMMENTS

A. SIGNIFICANT ENERGY IMPACTS ASSOCIATED WITH FAILURE TO PROVIDE AND MITIGATE WITH ON-SITE SOLAR

CEQA requires an EIR to analyze a project's energy consumption. (Pub. Res. Code § 21100(b)(3).) In addition to examining whether there is a "wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources," lead agencies must investigate whether any renewable energy features could be incorporated into the project. (CEQA Guidelines § 15126.2(b); *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 167-168 [duty to investigate renewable energy option is required as part of determining whether project impacts on energy resources are significant].) A project's compliance with building codes may not be enough where they do not address many considerations under Appendix F of the CEQA Guidelines, like "whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope … [,] energy impacts for a project intended to transform agricultural land into a regional commercial shopping center." (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.)

Here, the Project lacks any onsite solar even though the California Building Code ("**CBC**"), as adopted by the City, generally requires one kilowatt (1 kW) of solar photovoltaic system per 10,000 sf of new development. (DEIR, PDF pp. 235, 727 [CBC § 117.1].) Instead, the Project relies on an exception allowing it to pay an in-lieu fee to have solar built on other City properties. (DEIR, PDF p. 258, 343 [CBC § 117.2].) This fee option, however, should only apply if it is infeasible to install solar "due to the configuration of the proposed construction project" (CBC § 117.2), which begs the question: why would the Applicant configure the Project in such a way to make solar infeasible? Moreover, mere compliance with the CBC exemption does "not meet the requirements of appendix F of the CEQA Guidelines." (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264.) The relevant question is whether *wasteful use of energy can be avoided* or *renewable energy could be incorporated* into the Project. (CEQA Guidelines § 15126.2(b).)

Response to Comment 10-4

This comment raises questions regarding the provision of solar panels on the Project Site. The Project's energy consumption is analyzed in Section 4.4, *Energy*, and Section 4.14.4, *Electric Power, Natural Gas, and Telecommunication Facilities*, of the Draft EIR, and impacts were found to be less than significant. The comment refers to CEQA Guidelines Section 15126.2(b) to state that renewable energy should be incorporated into the project. However, CEQA Guidelines Section 15126.2(b) actually states:

> *"If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy,*

> *during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project".*

Pages 4.4-21 through 4.4-29 analyze the Project's construction and operational energy requirements and whether it would result in the wasteful, inefficient, unnecessary consumption of energy. As analyzed, the Project's construction and operational impacts would not result in the wasteful, inefficient, unnecessary consumption of energy. Additionally, as stated on pages 4.4-30, 4.4-31, 4.14.4-12, and 4.14.4-13 of the Draft EIR, based on the required load forecast projections by Southern California Edison (SCE), Los Angeles Department of Water and Power (LADWP), and Southern California Gas Company (SoCalGas), these utilities would be expected to meet the Project's demand, and the Project's operational electricity and natural gas services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Thus, in compliance with CEQA Guidelines Section 15126.2(b) since the Project's energy impacts would be less than significant, no mitigation is warranted to incorporate renewable energy features into the Project.

In a *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 167-168, the EIR did not comply with CEQA because the County did not identify or discuss impacts on renewable energy content as an element of the energy conservation analysis: despite being requested to address renewable energy. The Final EIR did not address either decreasing reliance on fossil fuels or increasing reliance on renewable energy resources. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211 found that the City's EIR failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options. These are not the case with the Project's Draft EIR. The Draft EIR discusses decreasing reliance on fossil fuels on pages 4.4-28 and 4.4-29 and discusses increasing reliance on renewable energy resources by SCE and LADWP and onsite resources on page 4.4-32. Moreover, the Project is likely to remain with SCE for its electricity needs and SCE must comply with SB 100; SB 100 increased California's Renewables Portfolio Standard and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024. As discussed on page 4.4-32, the Project will comply with the requirements of the Los Angeles Green Building Code and the CALGreen Code and comply with Culver City Municipal Code (CCMC) Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. The Draft EIR does not state that the fee will be paid in-lieu of putting in a photovoltaic system. However, as the Project has not been completely designed, it will either comply with City requirements to include a photovoltaic system or pay the in-lieu fee. With respect to other on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels.

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The case of *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264, is referring to a Draft EIR which relied on compliance with Title 24, implementation of additional sustainability features, and being served by a utility to determine that the proposed project would not directly require the construction of new energy generation or supply facilities, or result in the wasteful, inefficient, or unnecessary consumption of energy. That is not the case with the Project Draft EIR. Table 4.4-3, page 4.4-22 of the Draft EIR, provides the expected electricity, gasoline, and diesel usage for construction of the Project. Table 4.4-4, pages 4.4-24 and 4.4-25, highlights the electricity, natural gas, gasoline, and diesel usage for Project operations. The discussions provided in Section 4.4, *Energy*, of the Draft EIR state how much of the available supply the Project would utilize. Additionally, the analysis includes the effects of the Project on Local and Regional energy Supplies and on Requirements for Additional Capacity, pages 4.4-29 through 4.4-31 of the Draft EIR. Thus, the Draft EIR analyzes the energy impacts of construction and operation of the Project in compliance with Appendix F.

Comment 10-5

The DEIR fails to explain why solar cannot be incorporated into the Project. The Applicant's neighbor, the historic Helms Bakery district, found it feasible to add solar on roughly one-quarter of its rooftops—nearly twenty years ago.[5] Fast forward to today, single-family homes are expected to do their part to ready California for an all-electric future (e.g., onsite solar, battery storage, electric heat pumps, etc.).[6] Contrary to claims otherwise, the Project's lack of solar leads to wasteful energy use. There is no enforceable mitigation condition ensuring the Project will not opt out of the 100 percent renewable option (i.e., Clean Power Alliance) by instead choosing power provided by SoCal Edison ("**SCE**"), and where SCE already had difficulty meeting even 33 percent renewable energy portfolio target in 2020. (DEIR, pp. 4.4-10, 4.4-14.) There is no assurance that just because SCE and the Los Angeles Department of Water and Power ("**LADWP**") may have a "long-term plan," they will ultimately hit their 2030 and 2045 targets. (DEIR, p. 4.4-26.) Furthermore, providing solar onsite immediately reduces the Project's wasteful use of grid energy, compared to waiting an undetermined time for the City to use in-lieu fees. It seems that incorporating onsite solar would be the superior choice to avoid wasteful use of energy resources.

Only onsite solar capitalizes on this unique opportunity. The City is heavily built out, and its solar program does not apply to many uses (e.g., 1- and 2-family residences, parking structures, garages, etc.). (CBC § 117.1.A.) Thus, the Project presents a unique opportunity for the City to (i) *expand* its renewable energy sources while also (ii) decreasing the Site's reliance on potentially dirtier energy (i.e., furthering two of three goals listed in Appendix F). As the State moves closer to a full-electric future and more is demanded from the electrical grid, it must capitalize on opportunities to expand its renewable energy sources.

In sum, the Project's failure to provide onsite solar is a significant energy impact that requires more mitigation.

[5] Power Engineering (2/4/03) Historic Helms Bakery building taps into the sun with new solar power system, https://www.power-eng.com/renewables/historic-helms-bakery-building-taps-into-the-sun-with-new-solar-power-system/#gref.

[6] Cal. Energy Commission (8/11/21) Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions From Homes and Businesses, https://www.energy.ca.gov/news/2021-08/energy-commission-adopts-updated-building-standards-improve-efficiency-reduce-0.

Response to Comment 10-5

As discussed above in Response to Comment 11-4, energy impacts were less than significant and as such, the Project is not required to include solar as mitigation. Nonetheless, the Project will comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. Regarding the Clean Power Alliance, as stated on Page 4.14.4-5 in footnote 3, "[f]or the purposes of estimating energy demand the analysis conservatively assumes the Project would not switch electricity providers from SCE to the Clean Power Alliance (CPA) (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section if they chose 50 or 100 percent renewable electricity." Thus, since the energy analyses did not assume the utilization of power from the CPA, there is no need to have a mitigation measure to ensure the Project utilizes the CPA.

SCE and LADWP are required to comply with the Renewable Portfolio Standards (RPS). As provided on Table 4.4-2, on page 4.4-14 of the Draft EIR, SCE had a renewables percentage of 30.9 percent and LADWP had a renewable percentage of 36.7 percent, the RPS goal was 33 percent by 2020. Although SCE did not meet the 2020 goal, as discussed on page 4.4-14 of the Draft EIR, SCE anticipates it will meet its own climate change and renewables objectives that align with SB 100's 2045 renewables requirement. Nonetheless, as mentioned above, the Project's energy analysis did not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity. Additionally, as stated above, the Project will comply with CCMC Chapter 15.02.1005.

Comment 10-6

B. PROJECT PIECEMEALING LEADS TO AN OVERPARKED, SINGLE-USE, APPLE-ONLY DISTRICT

A project's CEQA review must assess "the whole of an action" to ensure that all of the project's environmental impacts are considered. (CEQA Guidelines § 15378; *San Joaquin Raptor/Wildlife Rescue Center v. Cnty. of Stanislaus* (1994) 27 Cal.App.4th 713, 730 [held use of "truncated project concept" violated CEQA where EIR was otherwise adequate].) That means the environmental consequences of a project cannot be "submerged by chopping a large project into many little ones – each with a minimal potential impact on the environment - which cumulatively may have disastrous consequences." (*Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283-284; see also *City of Santee*, 214 Cal.App.3d at 1452. Thus, there can be no segmenting of a large project into two or more smaller projects to mask serious environmental consequences or evade CEQA review. (See CEQA Guidelines § 15378(a); *McQueen v. Bd. of Supervisors* (1988) 202 Cal.App.3d 1136, 1146-47.)

Response to Comment 10-6

This comment provides background CEQA information on piecemealing. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted. See Response to Comment 11-7, below, for a discussion of piecemealing as related to the Project.

Comment 10-7

Here, the Project is a 536,000-sf Apple office development right next to an existing 4-story, 128,000-sf Apple offices with minimal ground-floor retail that completed construction within the year. (DEIR, pp. 2-2 – 2-4.[7]) Hence, in two projects, Apple will have converted an entire city block into an *Apple-office-only zone*, which is comprised of three office buildings, all 4-5 story tall, totaling 664,000 sf, on a whole city block (appx. 236,815 sf),[8] resulting in roughly 2.80 floor-area-ratio. The impacts of all this should be analyzed together, *in toto*.

Based on the Project's estimated employees (i.e., 2144) and combined site (i.e., 4.46-acre), the site generates roughly 480 employees per acre. (DEIR, APP-M, PDF p. 28.) Furthermore, at 1,216 automobile parking spots, the Project is admittedly overparked by at least 74 spaces. (DEIR p. 4.12-28.) This amounts to a single-use, single-tenant project that is overparked and leaves mixed- use and increased density off the table—a squandered opportunity to capitalize on the housing needs in the metro-adjacent area.

[7] See GoogleMaps (showing structure still being built as of November 2021); AppleWorld Today (10/8/21) Apple Is Building New Two Entertainment Facilities in L.A., https://www.appleworld.today/archives/77243; LAUrbanize (6/10/19) Apple's New Culver City Office Building is Topped Out, https://la.urbanize.city/post/apples-new-culver-city-office-building-topped-out.

[8] See http://zimas.lacity.org/.

Response to Comment 10-7

The comment asserts that because the Project Site to be occupied by Apple Inc. is located adjacent to an office building at 8777 Washington Boulevard that Apple currently occupies, the impacts of the already in operation adjacent office building and the Project should be evaluated together. The Applicant for the development of the office building at 8777 Washington Boulevard was Vitruvian Culver City, LLC, not Apple Inc. Vitruvian Culver City, LLC was in no way working with or affiliated with Apple in developing the office building at 8777 Washington Boulevard. The Mitigated Negative Declaration or "MND" (CEQA document) was circulated for public review in 2017 and identified Vitruvian Culver City, LLC. as the Applicant. According to an article in Variety1, Apple leased the 8777 Washington Blvd. building (which HBO had previously planned to occupy) in 2018. This followed completion of the MND prepared for the 8777 Washington Boulevard office building. Therefore, at the time of preparation of the MND, Apple in no way was connected to both the 8777 Washington site and the current Project Site. As such, there is no evidence in the record that suggests Apple Inc. segmented a larger project into two or more smaller

[1] Spangler, T., Variety article October 8, 2021: Apple is Building a Massive New Campus Straddling L.A. and Culver City, https://www.yahoo.com/lifestyle/apple-building-massive-campus-straddling-120023473.html. Accessed September 13, 2022.

projects to mask serious environmental consequences or evade CEQA review. As such, no piecemealing between the Project and the office building at 8777 Washington Boulevard occurred.

The 8777 Washington building is fully built and occupied and is therefore part of the CEQA environmental baseline. CEQA requires analysis only of the Project's impacts over the baseline; the Draft EIR does this. The Draft EIR fully analyzed the impacts of the Project. The commenter has provided no evidence that Apple's occupancy of the Project and existing 8877 Washington building will result in new or different impacts than disclosed in the Draft EIR.

The comment also asserts that the Project amounts to a single-use, single-tenant project that is overparked and leaves mixed- use and increased density off the table—a squandered opportunity to capitalize on the housing needs in the metro-adjacent area. As discussed in Chapter 2, Section 2.4, Existing General Plan Land Use and Zoning, page 2-5, of the Draft EIR, the Culver City Parcel is zoned Industrial General (IG) and has a land use designation of General Corridor. It is located within the East Washington Overlay Zone which provides a more limited range of allowable uses relative to the underlying IG zone. The Los Angeles Parcel is zoned C2-2D-CPIO and is designated community commercial. The C2 zone permits a wide variety of commercial uses. The Project is a commercial development and is consistent with current zoning and land use designations.

Moreover, as set forth in Section 5.4.4 of the Draft EIR, a mixed use project would not meet the Project's underlying purpose to provide a creative office campus for innovative entertainment, media, and/or technology companies. Furthermore, a residential use or a mixed-use residential project would not meet most of the Project's basic objectives or would meet them to a lesser extent as the Project and would not avoid or substantially lessen the Project's significant and unavoidable impacts. Therefore, a mixed use alternative was rejected from consideration in the Draft EIR.

The commenter's opinion that the Project is overparked is noted. As an employment center project near transit, the Project's parking impacts are deemed less than significant under SB 743. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 10-8

C. HOUSING IMPACTS NEED BETTER CEQA ANALYSIS

The CEQA Initial Study Checklist, used to determine whether a project may have significant environmental impacts, includes the question of whether a project may "[c]onflict with any applicable land use plan, policy, or regulation … adopted for the purpose of avoiding or mitigating an environmental effect." (*Guidelines*, appen. G; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 929 (EIR required to analyze project's inconsistency with City land use ordinance for planned developments).) A project is inconsistent if it conflicts with a fundamental, mandatory and specific land use policy. (*Families Unafraid to Uphold Rural etc. County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1342.) Furthermore, a project that causes a loss of housing stock, land available for housing, or violates zoning laws designed to encourage housing, can pose a potentially significant impact that must be considered under CEQA. (*Concerned Citizens v. Los Angeles Unified School District* (1994) 24 Cal.App.4th 826, 838 (SEIR acknowledged

significant adverse impact on affordable housing stock); *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1038-39 (loss of housing can constitute a potentially significant impact necessitating adequate mitigation measures).)

This overparked, Apple-only mega-block appears to be a continuation of development patterns that likely have led to the City's severe housing shortage.[9] The City recognizes the mismatch between jobs and house growth, most recently reflected in the City's Housing Element 2021-2029 ("**Housing Element**") [10] presented to City Council on August 8, 2022. For example, in 2016, the City's 2.8 jobs-to-housing ratio was more than double that of the County's 1.3 jobs-to-housing ratio; the City's jobs-to-housing ratio has only worsened in recent years. (Housing Element, pp. 11-12.) To put in context, the job-to-housing ratio in the relevant Competitive Market Area (i.e., nearby westside cities) would be 1.5:1—meaning "pent-up" demand for housing based on below 2020 numbers would be approximately 23,000 additional units.[11]

Table 6: Culver City Jobs to Housing Ratio

	2016	2020	2035	2045
Total Jobs	49,935	60,312	62,303	64,071
Housing Units	17,528	17,146	17,675	18,014
Jobs to Housing Ratio	2.8	3.5	3.5	3.6

Sources: American Community Survey 2012-2016; Census Transportation Planning Products 2012-2016; 2020 Regional Transportation Plan/Sustainable Communities Strategy Data/Map Book, SCAG 2017.

In addition to a poor track record, the City now faces a steep increase in its Regional Housing Need Allocation ("**RHNA**") obligations. Through the 2029 planning period, the City is looking at a 2,272 new affordable unit obligation (i.e., moderate income or below). (Housing Element, p. 38.) That is more than six times greater than the 333 net new housing units added by the City during the prior 2013-2021 Housing Element Cycle. (Id., at p. 15) (see below.)

Table 31: 2021-2029 Regional Housing Needs Assessment for Culver City

Extremely Low*	Very Low	Low	Moderate	Above Moderate	Total
554	554	604	560	1,069	**3,341**
16.5%	16.5%	18.0%	17.0%	32.0%	**100%**

In sum, the City cannot expect to improve the City's job-housing imbalance and start chipping away at its housing obligations if it continues to prioritize office projects like this over housing—especially near transit. This is a significant land use inconsistency not disclosed in the DEIR.

[9] See Housing Element, pp. B-8 (discussing non-residential development); UCLA (June 2020) Urban Design Report: Reimagining The Transit Gateway Of Culver City, pp. 15, 18 (discussing increase in employment population, rent-burden population, and City's low rate of permitting multi-family, https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f2b537946f58f297df7a323/1596674944940/3+Transit+Gateway+June+2020+Final.pdf; p. 5, 25, 29, 32-33 (nearly 50 times as many jobs as housing since 2002, City's job growth since 2002 has been nearly 2.5 times higher than LA County with information industry leading the way , exacerbating longer commutes as less than 10% of residents work in the City, and City has added 49 jobs per house unit as compared to the County's 2.4 jobs per housing unit.),

[10] https://www.culvercity.org/files/assets/public/documents/community-development/advance-planning/general-plan/housing-element/2022-08-08_att3_housing-element-redline.pdf.

[11] City (May 2020) General Plan Update: Socio-Economic Profile & Market Analysis, pp. 7-9, 32-33, 37-38, https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5ed154e8ef385f43440f6ff7/1590777081261/CCGPU_DemographicProfileMarketAnalysis_2020_0529.pdf.

Response to Comment 10-8

This comment speculates that the Project will result in significant housing impacts but provides no credible evidence thereof. As discussed above in Response to Comment 11-7, the Culver City Parcel is zoned IG and has a land use designation of General Corridor. It is located within the East Washington Overlay Zone which provides a more limited range of allowable uses relative to the underlying IG zone. The Los Angeles Parcel is zoned C2-2D-CPIO and is designated community commercial. The C2 zone permits a wide variety of commercial uses. The Project is a commercial development and is consistent with current zoning and land use designations. Additionally, a portion of the Project Site does not permit multifamily housing. Further, the Project Site was not identified for housing in Culver City's Housing Element Update approved in 2021.. Furthermore, the Project will not displace any existing housing or encroach into an existing neighborhood. The Draft EIR consider but rejected from consideration a mixed Residential/Mixed-Use Alternative in Chapter 5, *Alternatives*, Section 5.4.4, of the Draft EIR since it would not meet most of the Project objectives or meet them to a lesser extent, and would result in similar significant and unavoidable impacts.

Comment 10-9

D. DEIR'S GHG ANALYSIS IS FUNDAMENTALLY FLAWED

The California Supreme Court demands a robust GHG analysis to assess a project's impact on climate change. Lead agencies must provide "the contours of their logical argument," leaving no "analytical gaps" in the analysis, and supporting determinations "through substantial evidence and reasoned explanation." (*Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* ("*Newhall Ranch*") (2015) 62 Cal.4th 204, 227; see also *Cleveland National Forest Foundation v. San Diego Assn. of Governments* ("*Cleveland II*") (2017) 3 Cal.5th 497, 504, 519 [analysis must be "based to the extent possible on scientific and factual data … stay[ing] in step with evolving scientific knowledge and state regulatory schemes." (Quoting CEQA Guidelines § 15064(b)].) This analysis must include good faith efforts to disclose a project's anticipated emissions and consider consistency with the State's GHG reduction requirements, such as: reducing to 1990 GHG emission levels by 2020 (i.e., AB 32); 40 percent below 1990 levels by 2030 (i.e., SB 32); and 80 percent below 1990 levels by 2050 (i.e., Executive Order S-3-05). (See CEQA Guidelines § 15064.4.)

Here, the DEIR claims the Project has no GHG impacts because it would be consistent with the Southern California Association of Governments ("**SCAG**") 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy ("**RTP/SCS**"),[12] California Air Resources Board ("**CARB**") Climate Change Scoping Plan,[13] the City's Green Building Program, the Los Angeles Green New Deal, and the Los Angeles Green Building Code. (DEIR, pp. 4.6-42, 4.6-68.) However, this conclusion is incorrect for the following reasons.

[12] See e.g., SCAG (Apr. 2016) 2016-2040 RTP/SCS ("**2016 RTP/SCS**"), https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557, and associated Program EIR ("**2016 RTP/SCS PEIR**"),

https://scag.ca.gov/sites/main/files/file-attachments/2016dpeir_complete.pdf?1624320652; SCAG (9/3/20) 2020-2045 RTP/SCS ("**2020 RTP/SCS**"), https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, and associated Program EIR ("**2020 RTP/SCS PEIR**"), https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618.

13 See e.g., CARB (Nov. 2017) California's 2017 Climate Change Scoping Plan ("**2017 Scoping Plan**"), https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf; CARB (5/10/22) "**Draft 2022 Scoping Plan Update**," https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf.

Response to Comment 10-9

The comment states that the Draft EIR must comply with CEQA Section 15064(b) and must include a good faith effort to disclose a project's anticipated emissions and consider consistency with the State's GHG reduction requirements as outlined in CEQA Section 15064.4. The Draft EIR addressed the Project's GHG emissions in Section 4.6, *Greenhouse Gas Emissions*, and with supporting data provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR. CEQA Guidelines 15064.7(a) states that "[a] threshold of significance is an identifiable, quantitative, qualitative, or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." Although GHG emissions can be quantified, CARB, SCAQMD, and the City of Culver City and the City of Los Angeles have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the Project.

The California Natural Resources Agency (CNRA) has also clarified that the CEQA Guidelines focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)).[2] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[3] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[4] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."[5] Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions. Therefore, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or

2 See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pages 11-13, 14, and 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

3 CCR, Title 14, Section 15064(h)(3).

4 CCR, Title 14, Section 15064(h)(3).

5 CCR, Title 14, Section 15064(h)(3).

mitigation of GHG emissions. Using that evaluative methodology, the Draft EIR included substantial evidence that supported the appropriate conclusion that the Project's impacts on GHGs would be less than significant. The Project was found consistent with applicable plans, policies, regulation and requirements adopted to implement a Statewide, regional, or local plan for the reduction of GHG emissions and impacts were found to be less than significant. Furthermore, construction and operational GHG emissions were calculated for the Project to give the public and decisions makers an idea of what the Project GHG emissions would be.

Comment 10-10

1. Qualitative Analysis Relies on Non-Binding, Non-CAP Plans Not Specific to Local Land Use Projects

Referencing CEQA Guidelines §§ 15064(h)(3) and 15064.4(b), the Draft EIR suggests the referenced CARB, SCAG, and local plans are equivalent to a qualified GHG reduction plan or Climate Action Plan ("**CAP**(s)"). (See DEIR, pp. 4.6-35-36.) This is an inaccurate reading of these sections.

First, Section 15064(h)(3) permits lead agencies to find projects not cumulatively considerable when a project complies with an approved plan or mitigation program that "provides *specific requirements* that will avoided or substantially lessen the cumulative problems within the *geographic area in which the project is located* ... [and] the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable." (Emphasis added). When adopted, the Resources Agency explained that this subsection provides a "rebuttable presumption" for "certain" plans, such as local CAPs that "contain specific requirements with respect to resources that are *within the agency's jurisdiction* to avoid or substantially *lessen the agency's contributions to GHG emissions* …." (2009 Final Statement of Reason,[14] pp. 14-15.) As further explained, "consistency with plans that are *purely aspirational* (i.e., those that include only *unenforceable goals without mandatory reduction measures*), provides no assurance that emissions within the area governed by the plan will actually address the cumulative problem, *may not achieve the level of protection necessary to give rise to this subdivision's presumption*." (Id., at p. 16 [emphasis added]). Hence, lead agencies must "draw a link between the project and the specific provisions of a binding plan or regulation," before the subsection (h)(3) rebuttable presumption is to take effect. (Id. [emph. added].)

[14] Resources Agency (Dec. 2009) Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf.

Response to Comment 10-10

The Draft EIR found the Project to be consistent with the 2020-2045 RTP/SCS (Table 4.6-7, pages 4.6-54 and 4.6-55), Climate Change Scoping Plan (Table 4.6-6, pages 4.6-54 through 4. the Los Angeles Green New Deal/Sustainable City pLAn (Table 4.6-8, pages 4.6-56 through 4.6-58), and the Culver City Green Building Program and City of Los Angeles Green Building Code (pages 4.6-54, 4.6-58, and 4.6-59). As a result, GHG Project impacts would be less than significant based on the threshold of significance. Contrary to the comment, the requirements of these plans are

mandatory and directly or indirectly applicable to the Project as outlined in the discussions in the Draft EIR for each plan. Also contrary to the comment, the above GHG reduction plans do not need to qualify as Climate Action Plans or be specific to land use projects. CEQA Section 15064.4(b)(3) allows a lead agency to consider "[t]he extent to which the project complies with regulations or requirements adopted to implement a "*statewide, regional, or local plan*" for the reduction or mitigation of greenhouse gas emissions" (Emphasis added). Moreover, the 2020-2045 RTP/SCS is a CARB-certified GHG reduction plan. CEQA Section 15183.5(a) provides that a lead agency "may analyze and mitigate the significant effects of GHG emissions at the programmatic level, such as a general plan, a long-rage development, or a separate plan to reduce greenhouse gas emissions." The 2020–2045 RTP/SCS, Climate Change Scoping Plan, the Los Angeles Green New Deal/Sustainable City pLAn, and the Culver City Green Building Program and Los Angeles Green Building Code have all undergone a public review process and are applicable planning policies and/or development regulations.

Therefore, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions were evaluated consistent with CEQA Guidelines Sections 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Since the Project would not be in conflict with these applicable plans, policies, and regulations to reduce GHG emissions, Project impacts are less than significant.

Comment 10-11

Next, Section 15064.4(b)(3) states that a relevant factor for lead agencies' GHG analysis to consider is the "extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (*see, e.g., section 15183.5(b)*)." (Emph. added.) Section 15183.5(b) confirms that "[p]ursuant to *sections 15064(h)* … a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program *under specified circumstances*." (Emphasis added.) Those specified circumstances include the detailed plan elements needed for a CAP (i.e., inventorying of existing/anticipated GHGs, establishing reduction goal, anticipating project emissions, identifying specific measures including performance standards, monitoring CAP implementation, and adopting CAP via CEQA process). (Id., at subdivision (b)(1)(A)-(F).) As explained by the Resources Agency, section 15064.4(b)(3) was amended to specifically reference section 15183.5(b) because it was "needed to clarify that lead agencies may rely on plans *prepared pursuant to section 15183.5* in evaluating a project's [GHG] emissions ... [and] consistent with the Agency's Final Statement of Reasons for the addition of section 15064.4, which states that 'proposed section 15064.4 is *intended to be read in conjunction with ... proposed section 15183.5*. Those sections each indicate that local and regional plans may be developed to reduce GHG emissions.' [2009 Final Statement of Reason,[15] p. 27][.]" (2018 Final Statement of Reason, [16] p. 19 [emphasis added]).

Here, *none* of the plans cited by the Draft EIR—including the local plans—are a qualified CAP that includes project-specific measures and features that are project-specific, mandatory, tethered to quantifiable data, and directly serve to reduce the local projects' contribution to GHG emissions.

(DEIR, pp. 4.6-29-4.6-33, 4.6.36-4.6-37.) Additionally, the vast majority of the cited regulatory measures in the DEIR are not Project-specific and/or are entirely the responsibility of State and regional agencies to adopt regulations that the Project cannot claim credit for (e.g., Cap- and-Trade, Renewables Portfolio Standard, Low Carbon Fuel Standards, Advanced Clean Cars Program, Short-Lived Climate Pollutant Strategy, etc.). (DEIR, Tbls. 4.6-6, 4.6-7.) It would be "misguided" to suggest Cap-and-Trade or other state regulations cover mobile emissions from local land-use projects.[17] Furthermore, neither SCAG's RTP/SCS nor CARB's Scoping Plan are binding on local agencies' approval of local land use projects.[18]

In sum, the Draft EIR relies entirely on non-binding, aspirational GHG goals that are not specific to the reduction of the City's fair share of GHG emissions from local land use developments and, thus, do not meet the requirements of CEQA Guidelines §§ 15064(h)(3) or 15064.4(b)(3).

15 Ibid.

16 Resources Agency (Nov. 2018) Final Statement of Reasons for Regulatory Action: Amendments to The State CEQA Guidelines, https://files.resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf.

17 CARB (12/5/18) RE Centennial Specific Plan Final EIR, pp. 3-4, 6-7, 10-11, https://ww3.arb.ca.gov/toxics/ttdceqalist/centennialfeir.pdf; see also Draft 2022 Scoping Plan, p. 218 ("There is much local jurisdictions can do to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—*do not substitute for these local efforts*." Emphasis added.)

18 See e.g., 2020 RTP/SCS, p. xiv ("*There is no obligation* by a jurisdiction to change its land use policies, General Plan, or regulations *to be consistent with Connect SoCal* … SCAG will maintain communication with agencies that use SCAG's sub jurisdictional-level data to ensure that the '*advisory and nonbinding*' nature of the data is appropriately maintained." Emphasis added); 2020 RTP/SCS PEIR, pp. 3.8-33 ("[CARB] published the 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (CARB Report) which includes non-*binding* technical information on what level of statewide VMT reduction, in the judgment of CARB staff, would promote achievement of statewide GHG emission reduction targets." emphasis original); 2017 Scoping Plan, p. 99 ("Local government efforts to reduce emissions within their jurisdiction are *critical to achieving the State's long-term GHG goals* … To support local governments in their efforts to reduce GHG emissions, the following guidance is provided … While this guidance is provided out of the recognition that local policy makers are critical in reducing the carbon footprint of cities and counties, the decision to follow this *guidance is voluntary and should not be interpreted as a directive or mandate to local governments*." Emphasis added.)

Response to Comment 10-11

See Response to Comments 11-9 and 11-10 above for discussions on adoption of the significance threshold and the applicability of the 2020–2045 RTP/SCS, Climate Change Scoping Plan, the Los Angeles Green New Deal/Sustainable City pLAn, and the Culver City Green Building Program and Los Angeles Green Building Code as GHG reduction plans. The Draft EIR does not state or infer that any of the applicable planning documents referenced serve as a CAP for purposes of setting a GHG threshold of significance. CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions, which as evidenced above (Response to Comment 11-10), this Project does. Therefore, the Draft EIR does not rely on non-binding, aspirational GHG goals but on applicable plans, policies, regulations, and requirements that were adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Since the Project would not be in conflict with these applicable plans, policies, and regulations to reduce GHG emissions, Project impacts are less than significant.

Comment 10-12

2. Sustainable Features Are Overblown

As previously discussed, the Project suffers numerous flaws, including failing to incorporate onsite solar or provide any reasonable explanation for why solar would be infeasible. Additionally, rather than maximizing density and bringing a variety of uses that can capitalize on the Site's proximity to the Culver City Metro station, the Project leaves *increased density, including housing, off the table* and excludes all but *one use* and *one tenant* from this City-block. Furthermore, this 100 percent commercial Project will continue the same type of development pattern that likely has contributed to a serious housing imbalance in the City. These design flaws cut against numerous GHG reduction strategies cited by the Draft EIR (e.g., Million Solar Roofs Program, develop residential and employment developments, net zero carbon by 2030, 95 percent of electricity generation would be zero carbon, etc.). (DEIR, pp. 4.6-45, 4.6-54, 4.6-57,4.6-62.) We also note the Project's proposed removal of 19 street trees. (DEIR, pp. 2-12, 4.1-22; Initial Study, Street Tree Report,[19] PDF p. 76.) The removal of trees can also be considered a significant impact warranting mitigation. To the extent mature street trees can remain in place and be accommodated on site, they should not be removed. If replacement is required, we ask that the City consider mitigation to the following effect:

> *All required replacement street trees shall be comprised of California native/indigenous trees. California native/indigenous trees include but are not limited to the trees designated "California Native" on the Tree People City of Los Angeles Approved Street Tree List: https://www.treepeople.org/wp-content/uploads/2021/02/TreePeoples-LA-City-Approved-Street-Tree-List.pdf.*
> *When feasible, new landscaping shall be comprised of California native/indigenous water-conserving plants, in substantial conformance with project plans (provided in Attachment B). California Native/indigenous plants include but are not limited to plants listed by the Metropolitan Water District and the California Native Plant society in their Planting Guide for LA County: https://www.bewaterwise.com/assets/mwd_plantguide-screen_la_4_23.pdf.*

[19] https://www.culvercity.org/files/assets/public/documents/community-development/current-projects/8825-national-project-crossings/ceqa-documents/project-crossings-initial-study.pdf.

Response to Comment 10-12

See Response to Comments 11-4 through 11-10 for discussions on solar, housing/mixed-use land use, GHG thresholds and comparison to GHG reduction plans. Regarding the removal of 19 on site trees, as stated on page 2-12 of the Draft EIR, for any street tree removed in the City of Culver City, the Project would comply with the City of Culver City's Transit Oriented District Streetscape Plan and applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City of Culver City's requirements, the Project is required to plant two new Street Right of-Way trees or Parkway trees for each tree that is removed from the right-of-way. The size and location of the replacement trees would be determined by the Transit Oriented District

Streetscape Plan and by the Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. For any street tree removal in the City of Los Angeles, Project landscaping would comply with applicable LAMC and Urban Forestry Division requirements, which currently require street tree replacement on a 2:1 basis and approval by the Board of Public Works. The Venice Boulevard and National Boulevard Streetscapes would be enhanced with widened sidewalks, street trees and landscaped parkways, providing greater separation from the roadways and improving the pedestrian experience along the Project frontages. The Project would provide streetscape improvements, including a double row (colonnade) of trees along Venice Boulevard's 29-foot-deep public right-of-way. The Project would provide 13-15 feet along National Boulevard for a 7-foot deep, landscaped parkway and 6-8-foot sidewalk. Based on jurisdictional requirements (Culver City/City of Los Angeles), six street trees would be planted along the Building 1 frontage on National Boulevard and a total of 28 street trees would be planted along the Building 2 frontages on Venice and National Boulevards (City of Los Angeles). Street trees could consist of *Platanus x Acerifolia* (London Plane) along Venice Boulevard and *Lagerstroemia indica 'Natchez'* (Crape Myrtle) along National Boulevard. Accent trees at building entrances could be *Ulmus parviflora* (Chinese elm). Since the Project would comply with applicable City of Culver City and City of Los Angeles requirements, impacts from tree removal would be less than significant.

Comment 10-13

3. Quantitative Analysis Is Lacking, and Improper Rejection of SCAQMD Thresholds Hides the Project's GHG Significance

The Draft EIR refuses to use any numeric threshold and explicitly rejects the use of South Coast Air Quality Management District ("**SCAQMD**") multi-tier GHG thresholds[20] because they purportedly were "not formally adopted." (DEIR, pp. 4.6-27, 4.6-37.) This reasoning is inconsistent with the DEIR's use of SCAQMD's guidance elsewhere on methodology (DEIR, p. 4.6-39), and repeated use of the Los Angeles Green New Deal despite being "not an adopted plan." (DEIR, p. 4.6- 32.) Additionally, lead agencies routinely use SCAQMD's multi-tier thresholds, including the City of Los Angeles' prior use of Tier 3 screening threshold of 1,400 metric tons of CO2 equivalent per year ("**MTCO2e/yr**") for commercial projects[21] and 3,000 MTCO2e/yr for mixed-use projects or non- industrial projects,[22] and SCAQMD's Tier 4 performance standards of 4.8 (2020 year) and 3.0 (2035 year) MTCO2e/yr per service population (i.e., residents and employees) or similar efficiency standards.[23]

[20] See SCAQMD (Oct. 2008) Draft Guidance Document – Interim CEQA GHG Significance Threshold, pp. 3-10 – 3-16, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa- significance-thresholds/ghgattachmente.pdf; see also SCAQMD (12/5/08) Board Letter, p. 5, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2; SCAQMD (9/28/10) Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group # 15, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse- gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

[21] See e.g., DCP Case No. ENV-2017-3855 (Oct. 2018) MND, PDF pp. 49-50, https://planning.lacity.org/odocument/423baae0-300e-476d-add1-70364bb43d09/ENV-2017-3855.pdf.

[22] See e.g., DCP Case No. ENV-2017-4170 (Dec. 2018) MND, PDF pp. 112-114The , https://planning.lacity.org/odocument/03048272-13c8-4ed5-9331-01c45f38396f/ENV-2017-4170.pdf; DCP Case No. ENV-2015-897 (Jan. 2016) Initial Study, PDF pp. 89-91, http://planning.lacity.org/eir/nops/333LaCienega/is.pdf; DCP Case No. ENV-2016-1604 (Apr. 2017) MND, PDF

pp. 86-87, https://planning.lacity.org/staffrpt/mnd/Pub_033017/ENV-2016-1604.pdf; DCP Case No. ENV-2017-3896 (Dec. 2018) MND, PDF pp. 41, https://planning.lacity.org/odocument/77719943-bf70-4633-bc5d-19ad5c7f8a39/ENV-2017-3896.pdf; DCP Case No. ENV-2016-1367-EIR (1/1/17) IS, PDF pp. 87-88, https://planning.lacity.org/eir/EdinburghAve/DEIR/Appendix%20A%20-%20NOP%20IS%20and%20Comment%20Letters.pdf; DCP Case No. ENV-2016-2384 (Jan. 2018) MND, PDF pp. 101-103, https://clkrep.lacity.org/onlinedocs/2018/18-0827_misc_1_08-28- 2018.0001.pdf; Bureau of Engineering ("BOE") W.O. E1908381 (3/13/19) CE, PDF pp. 4, 18, https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf; Council File ("CF") No. 18-0392 project (3/13/19) CE, PDF pp. 547, 578, https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf; DCP Case No. ENV-2014-4288 (Oct. 2015) DEIR, PDF pp. 31-32, https://planning.lacity.org/eir/5750HollywoodBlvd/DEIR/4.C_Greenhouse_Gas_Emissions.pdf; DCP Case No. ENV-2016-1662 (Jun. 2017) DEIR, PDF p. 50, https://planning.lacity.org/eir/ProvidenceTarzanaMedicalCtr/Deir/files/D_IVD.pdf; DCP Case No. ENV-2017-628 (2/6/19) MND, PDF p. 72-73, https://planning.lacity.org/odocument/64056bf9-e4b7-4085-b33f-89ced0b9dac5/ENV-2017-628.pdf; DCP Case No. ENV-2019-6290 (Feb. 2021) MND, PDF p. 114-115, https://planning.lacity.org/odocument/7cb38074-68db-4b01-b2bd-cb2034240cd5/ENV-2019- 6290.pdf; DCP Case No. ENV-2020-5838 (Jul. 2021) NegDec, PDF p. 106, https://planning.lacity.org/odocument/6dd1558c-675d-46dd-85a3-cfa19e776b30/ENV-2020-5838.pdf; DCP Case No. ENV-2019-5520- MND (Jul. 2021) IS, PDF pp. 84-85, https://planning.lacity.org/odocument/37473b1c-89af-485c-a16b-1db96fb4b9c4/ENV-2019-5520.pdf; DCP Case No. ENV-2020-6951 (Aug. 2021) MND, PDF p. 55, https://planning.lacity.org/odocument/85a03721-39db-4b70-9078-f7220c76f336/ENV-2020-6951.pdf; ENV-2017- 3972 (Sep. 2021) Subsequent MND, PDF pp. 82-85, https://planning.lacity.org/odocument/b718e33a-4781-437f-a2a9-194d28bf36e4/ENV-2017-3972.pdf; Case No. ENV-2020-2497 (Apr. 2020) SCEA, PDF p. 72, https://planning.lacity.org/odocument/eb7f30da-32a8-4c66-810b-49d3431a1473/6_Sustainable_Communities_Environmental_Analysis.pdf; ENV-2019-2314 (Mar. 2020) SCEA, PDF p. 35-37, https://planning.lacity.org/odocument/2b972b78-9efa-4bc9-9b38-e6adcb55efc1/VI_Sustainable_Communities_Environmental_Analysis.pdf; Case No. ENV-2018-5594 (Sep. 2019) SCEA, PDF pp. 57-58, https://planning.lacity.org/eir/sceas/documents/thatcheryard/V%20SCEA%20Initial%20Study%20Checklist.pdf; Case No. ENV-2015-4131 (Sep. 2019) MND, PDF p. 63, https://planning.lacity.org/odocument/f809dc18-39a9-4874-8f39-9b2bcd43a8db/ENV-2015-4131.pdf; Case No. ENV-2019-7321 (Oct. 2020) MND, PDF p. 51, https://planning.lacity.org/odocument/001ce94f-037b-42cb-a1c6-a79939b171a6/ENV-2019-7321.pdf; Case No. ENV-2014-3179 (Mar. 2020) MND, PDF p. 59, https://planning.lacity.org/odocument/12c43f0f-86dc-4932-b385-4fb33e8a211d/ENV-2014-3179.pdf; Case No. ENV-2019-1065 (Aug 2019) MND, PDF pp. 33-34, https://planning.lacity.org/odocument/30b4f3bc-b498-4392-81c4-164f92c94b38/ENV-2019-1065.pdf; Case No. ENV-2019-0686 (May 2019) MND, PDF p. 41, https://planning.lacity.org/odocument/1e701bbd-6286-425e-99af-e1bea3861173/ENV-2019-686.pdf and Appendix B, PDF p. 10, https://planning.lacity.org/odocument/83cc6338-cd86-43b9-9a6f-b0d4b3178e00/ENV-2019-686-B.pdf; Case No. ENV-2018-7122 (May 2019) MND, PDF p. 42, https://planning.lacity.org/odocument/a0a072c7-6a41-4204-b52f-596f704d1e8c/ENV-2018-7112.pdf and Appendix B, PDF p. 21, https://planning.lacity.org/odocument/3df9f721-f978-47c2-8bca-0d721c35b3b2/ENV-2018-7112-B.pdf; Case No. ENV-2017-613 (May 2019) MND, PDF p. 42, https://planning.lacity.org/odocument/6fbd4854-fd37-4f50-bd30-c813dff9a747/ENV-2017-613.pdf and Appendix A, PDF pp. 4-5, https://planning.lacity.org/odocument/aba55507-7fd6-49ff-abb1-4e7045a583a2/ENV-2017-613-A.pdf; Case No. ENV-2017-713 (Aug. 2019) MND, PDF p. 74, https://planning.lacity.org/odocument/b50b48c4-d6f8-4a83-9e0d-3a488b26b524/ENV-2017-713.pdf; Case No. ENV-2019-5436 (Oct. 2019) MND, PDF p. 50, https://planning.lacity.org/odocument/319eeb30-cc17-455f-b322-8d0eb498fc4c/ENV-2019-5436.pdf; Case No. ENV-2019-3845 (Oct. 2019) MND, PDF pp. 41-42, https://planning.lacity.org/odocument/2ad7c32a-9ae9-4ee1-ace0-2c33f991b052/ENV-2019-3845.pdf; Case No. ENV-2019-4650 (Oct. 2019) MND, PDF pp. 86-87, https://planning.lacity.org/odocument/70edaa4e-52c0-4bdb-9960-f798e74b9dea/ENV-2019-4650.pdf; Case No. ENV-2015-4630 (Aug. 2018) DEIR, PDF p. 25, https://planning.lacity.org/eir/1375_St_Andrews_Apts/DEIR/DEIR%20Sections/IV.F.%20Greenhouse%20Gas%20Emissions%20(1375%20St%20Andrews)%20Public%20Review.pdf; Case No. ENV-2015-3603 (Jan. 2018) DEIR, PDF p. 53, https://planning.lacity.org/eir/6200WestSunset/Deir/files/D_IVD.pdf; Case No. ENV-2015-1853 (Jun. 2016) DEIR, PDF pp. 8, 12, https://planning.lacity.org/eir/Clarendon/DEIR/files/DEIR/4_2%20DEIR%20GHG.pdf; DCP Case No. ENV-2014-3995 (Feb. 2016) DEIR, PDF p. 16, https://planning.lacity.org/eir/andorasubdivision/DEIR/DEIR/12_IV.F_GHG.pdf.

[23] See e.g., DCP Case No. ENV-2016-1951 (Apr. 2018) DEIR, PDF pp. 40, 53-54, https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/D_IVC.pdf & GHG Appendix, PDF pp. 18-20, https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/App_C.pdf; DCP Case No. ENV-2016-3909 (Apr. 2018), DEIR, PDF pp. 38-40, 75, https://planning.lacity.org/eir/Promenade_2035/DEIR/files/D_IVD.pdf; DCP Case No. ENV-2015-244 (Oct. 2016) DEIR, PDF p. 139, https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20Sections/DEIR%20SunWest_Sections%20Compiled.pdf; DCP Case No. ENV-2016-3177 (Feb. 2020) DEIR, PDF pp. 45-46, https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/D.IV.E.pdf and Appendix C, PDF pp. 62-65,

https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/Appendix_C.pdf; DCP Case No. ENV-2014-1362 (Jul. 2016) DEIR, PDF pp. 52-53, https://planning.lacity.org/eir/ICONshermanOaks/DEIR/files/D_IVC.pdf; DCP Case No. ENV-2016-3576 (Sep. 2017) DEIR, PDF p. 23, https://planning.lacity.org/eir/668SoAlamedaStreet/Deir/4.5%20Greenhouse%20Gas%20Emissions.pdf; DCP Case No. ENV-2016-4889 (Jun. 2018) DEIR, PDF pp. 53-53, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Sections/IV.F%20GHG.pdf and Appendix E, PDF pp. 220-221, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Appendices/E-1%20-%20AQ%20and%20GHG%20Modeling.pdf; DCP Case No. ENV-2016-4313 (Dec. 2016) MND, PDF pp. 136-137, http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1_misc_7_02-22-2017.pdf; DCP Case No. ENV-2016-4394) MND, PDF pp. 164- 165, https://planning.lacity.org/odocument/42685ced-64ab-4c78-9f70-f5f63f805823/ENV-2016-4394.pdf; DCP Case No. ENV-2008-1421 (Oct. 2015) Addendum to Certified EIR, PDF pp. 28-31, http://clkrep.lacity.org/onlinedocs/2016/16-0033_misc_1_01-08-2016.0001.pdf; DCP Case No. ENV-2008-1773 (Sep. 2015) DEIR, PDF pp. 23-25, http://planning.lacity.org/eir/theReef/deir/DEIR%20Sections/IV.G.%20 Greenhouse%20Gases.pdf; DCP Case No. ENV-2013-194 (Feb. 2014) DEIR, PDF pp. 17-19, https://planning.lacity.org/eir/MuseumSquare/DEIR/DEIR%20Sections/IV.E.%20Greenhouse%20Gases_Global%20Climate%20Change.pdf.

Response to Comment 10-13

This comment claims that, instead of a qualitative threshold, the Draft EIR should have used a draft numeric threshold proposed by SCAQMD Staff in 2010 but never adopted. CEQA Guidelines Section 15064.4(a) expressly provides that the City, as lead agency, has the discretion to determine whether to use a quantitative GHG emissions threshold or a qualitative or performance-based one. In the absence of any applicable adopted numeric threshold, the Draft EIR assessed the Project's GHG impacts qualitatively by considering whether the Project complies with the 2020–2045 RTP/SCS, Climate Change Scoping Plan, the Los Angeles Green New Deal/Sustainable City pLAn, and the Culver City Green Building Program and Los Angeles Green Building Code as GHG reduction plans. The DEIR demonstrates that the Project is consistent with the applicable provisions of these plans. Therefore, the DEIR properly concluded that the Project's GHG impacts would be less than significant. For more discussion on this topic, refer to Response to Comments 10-9 through 10-11.

Comment 10-14

In fact, the Project exceeds SCAQMD's multi-tier GHG thresholds. The Project is not CEQA exempt (Tier 1), and there is no applicable CAP (Tier 2). As compared to the Site's baseline emissions (i.e., 2,045 MTCO2e/yr), the Project is estimated to generate 9,264 MTCO2e/yr (i.e., 7,216 MTCO2e/yr net emissions)—which far exceeds SCAQMD's Tier 3 screening thresholds (i.e., 1,400 and 3,000 MTCO2e/yr for commercial and non-industrial projects, respectively). (See DEIR, p. 4.6- 65.) Given the 7,216 MTCO2e/yr generated by the Project's 2,144 employees (i.e., 3.36 MTCO2e/yr/sp), the Project also exceeds SCAQMD's Tier 4 performance standard (i.e., 3.0 MTCO2e/yr/sp for year 2035). (Id.; see also DEIR, APP-B, PDF p. 403.) Hence, the City should find a significant GHG impact requiring additional mitigation measures and perhaps offset credits (Tier 5).

Under the circumstances, SCAQMD's Tier 3 and Tier 4 thresholds are most consistent with evolving standards applied by other air districts and agencies. Notwithstanding being proposed prior to the State's adoption of more aggressive GHG reduction goals of 40 percent 1990 levels by 2030 (i.e., SB 32), SCAQMD's Tier 3 screening thresholds and Tier 4 efficiency standards are akin to and most consistent with bright-line/efficiency thresholds adopted by numerous other air districts

in recent years, including Sacramento Metropolitan AQMD,[24] Bay Area AQMD,[25] Placer County APCD,[26] and San Luis Obispo County APCD.[27] Similarly, the Association of Environmental Professionals ("**AEP**") has proposed a 2030 land-use efficiency threshold of 2.6 MTCO2e/yr/sp.[28] Here, the DEIR fails to adequately justify its qualitative GHG analysis as staying in step with evolving scientific knowledge and state regulatory schemes. (See *Cleveland II*, 3 Cal.5th at 504, 519 [quoting CEQA Guidelines § 15064(b)].)

[24] SMAQMD (May 2018) Guide to Air Quality Assessment in Sacramento County, pp. 6:1-3, 6:10-12 ("(GHG) emissions adversely affect the environment through contributing, on a cumulative basis, to global climate change … *the District recommends that lead agencies address the impacts of climate change on a proposed project and its ability to adapt to these changes in CEQA documents* … [thus urging] evaluating whether the GHG emissions associated with a proposed project will be responsible for making a cumulatively considerable contribution to global climate change."[emphasis original]), http://www.airquality.org/LandUseTransportation/Documents/Ch6GHGFinal5-2018.pdf; *see also* SMAQMD Thresholds of Significance Table, http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf.

[25] BAAQMD (May 2017) CEQA Air Quality Guidelines, p. 2:1-4 ("No single project could generate enough GHG emissions to noticeably change the global average temperature [but rather] [t]he combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts."), http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[26] PCAPCD (Oct. 2016) CEQA thresholds of Significance Justification Report, pp. E-2, 2, 17-22 ("CEQA requires that the lead agency review not only a project's direct effects on the environment, but also the cumulative impacts of a project and other projects causing related impacts. When the incremental effect of a project is cumulatively considerable, the lead agency must discuss the cumulative impacts in an EIR. [citing CEQA Guidelines § 15064]"), https://www.placer.ca.gov/DocumentCenter/View/2061/Threshold-Justification-Report-PDF; see also PCAPCD (11/21/17) CEQA Thresholds And Review Principles, http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples.

[27] SLOAPCD (Mar. 28, 2012) GHG Threshold and Supporting Evidence, pp. 5, 25-30, 42 ("No single land use project could generate enough GHG emissions to noticeably change the global average temperature. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions.), https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Greenhouse%20Gas%20Thresholds%20and%20Supporting%20Evidence%204-2-2012.pdf.

[28] AEP (Oct. 2016) Beyond Newhall and 2020, pp. 25, 34, 40 40, https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf.

Response to Comment 10-14

In the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions were evaluated consistent with CEQA Guidelines Sections 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Since the Project would not be in conflict with these applicable plans, policies, and regulations to reduce GHG emissions, Project impacts are less than significant. For further discussion, refer to Response to Comments 10-9 through 10-13, above.

Comment 10-15

4. Failure To Consider Project-Level Mitigation Measures

The above analysis constitutes substantial evidence that the Project will have significant GHG emissions warranting further mitigation. The City should consider project-specific mitigation

measures and strategies urged by CARB, SCAG, the California Air Pollution Control Officer Association ("**CAPCOA**") [29] —such as those listed in CARB's 2017 Scoping Plan provided below:

B. <u>Examples of potentially feasible mitigation measures that could be considered for individual projects under CEQA when the local jurisdiction is the lead agency</u>

Construction

- Enforce idling time restrictions for construction vehicles
- Require construction vehicles to operate with the highest tier engines commercially available
- Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible
- Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance
- Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators
- Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available
- Require diesel standard fleets to be lowered emitting than any current emission standard

Operation

- Comply with lead agency's standards for mitigating transportation impacts under SB 743
- Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals
- Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate[1]
- Dedicate on-site parking for shared vehicles
- Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects
- Provide on- and off-site safety improvements for bike, pedestrian, and transit connections, and/or implement relevant improvements identified in an applicable bicycle and/or pedestrian master plan
- Require on-site renewable energy generation
- Prohibit wood-burning fireplaces in new development. and require replacement of wood-burning fireplaces for renovations over a certain size developments
- Require cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing
- Require solar-ready roofs
- Require organic collection in new developments
- Require low-water landscaping in new developments. Require water efficient landscape maintenance to conserve water and reduce landscape waste
- Achieve Zero Net Energy performance targets prior to dates required by CALGreen

- Require new construction, including municipal building construction, to achieve third-party green building certifications, such as the GreenPoint Rated program or the LEED rating system
- Require the design of bike lanes to connect to the regional bicycle network
- Expand urban forestry and green infrastructure in new land development
- Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use
- Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT
- Develop a rideshare program targeting commuters to major employment centers
- Require the design of bus stops/shelters/express lanes in new developments to promote the usage of mass-transit
- Require gas outlets in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available
- Require the installation of electrical outlets on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment
- Require the design of the electric boxes in new residential unit garages to promote electric vehicle usage
- Require electric vehicle charging station (Conductive/inductive) and signage for non-residential developments
- Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands

[1] This is not to be confused with the Americans with Disabilities Act (ADA) requirements or other minimum parking requirements for dedicating space to clean air vehicles and/or EV charging infrastructure

[29] 2017 Scoping Plan, Appendix B-Local Action, p. 7-9, https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf; SCAG (Dec. 2019) Final Program EIR, pp. 2.0-18 – 2.0-71 (see "project-level mitigation measures" for air quality, GHG, and transportation impacts), https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618; CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf.

Response to Comment 10-15

The comment contends that the Draft EIR fails to disclose the Project's significant impacts related to GHG emissions and lists a series of mitigation measures which the comment asserts should be incorporated into the Project. The comment's unsupported claim that the Draft EIR fails to analyze and disclose the Project's significant GHG impacts, which would require mitigation measures, is incorrect. The Draft EIR addressed GHG impacts in Section 4.6, *Greenhouse Gas Emissions*, with supporting data provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR. As analyzed therein, GHG impacts would be less than significant. CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. Refer to Response to Comments 10-9 through 10-14 for a discussion on the use of a qualitative threshold and whether the Project

complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Tables 4.6-10 (page 4.6-64) and 4.6-11 (page 4.6-65) of the Draft EIR provide the Project's estimated construction and annualized unmitigated operational GHG emissions with and without implementation of GHG reduction characteristics, features, and measures. This comparison is provided to evaluate the Project's efficiency with respect to GHG emissions but is not the threshold of significance used for impact analysis. The analysis assumes the "Project without implementation of GHG reduction characteristics, features, and measures" scenario would incorporate the same land uses and building square footage as the Project. Furthermore, this analysis is consistent with the most current regulatory policies and GHG quantification methods. Although the quantification of GHG emissions was not measured against a significance threshold because none have been adopted that are applicable to the Project, it nevertheless provides the extent to which the Project would increase greenhouse gas emissions as compared to the existing environmental setting. Therefore, as the Project does not result in a significant GHG impact based on the qualitative threshold above chosen by the lead agency, mitigation measures are not required.

Thus, consistent with CEQA Guidelines Section 15162.4(a)(3) which states that mitigation measures are "not required for effects which are not found to be significant", the Draft EIR concluded that no mitigation measures were necessary (page 4.6-67). Accordingly, in addition to not warranting any mitigation measures since the Draft EIR provides substantial evidence that the Project's GHG emissions impacts would be less than significant, the comment's list of mitigation measures is neither supported by facts substantiating the contention that mitigation measures are necessary nor any analysis of the value of the proposed mitigation measures. That is, the comment is devoid of facts to support the need for the mitigation measures and the effectiveness of the proposed measures. The list merely represents the commenter's arbitrary selection of features which are not required by CEQA or regulatory mandates.

Comment 10-16

III. CONCLUSION

In sum, Local 11 respectfully urges the City not to grant the Project Approvals until the abovementioned issues are addressed in a CEQA-compliant EIR that includes additional mitigation measures that reduce Project impacts on energy, land use, and GHGs.

Local 11 reserves the right to supplement this appeal justification at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under State or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092.) Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Floor, LA, CA 90017 (jordan@gideonlaw.net).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Response to Comment 10-16

This comment provides a general conclusion to this correspondence. The commenter will be added to the notification list. The comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Letter 11

Walter N. Marks Incorporated
8758 Venice Boulevard
Los Angeles, CA 90034
Received September 6, 2022

Comment 11-1

Please accept this letter as our written comment to the DEIR related to the Project noted above. As the property owner of the Helms Bakery campus, immediately adjacent to the subject site, we are addressing several impacts herein.

Response to Comment 11-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Response to Comments 12-2 through 12-8.

Comment 11-2

Please note that the City of Culver City has designated its portion of the Helms Bakery campus has a historic resource. As such, our ability to make modifications today, and in the future, to the physical plant, ensuring the operation of our campus, is limited.

Response to Comment 11-2

This comment notes that a portion of the Helms Bakery campus is designated as a historic resource. The analysis provided in Section 4.3, *Cultural Resources*, of the Draft EIR, acknowledges the Helms Bakery complex as a historic resource for purposes of the CEQA analysis. Based on the analysis therein, the Project was determined to have a less than significant impact with regard to historical resources and no mitigation measures were required.

Comment 11-3

We **support** the Project as described in the DEIR. We **do not support** Alternative 2 (Zoning Compliant), nor Alternative 3 (Reduced), and most importantly **do not support** Alternative 4 (Access Alternative).

Response to Comment 11-3

This comment indicates support for the Project as described and analyzed in the Draft EIR, and states that the commenter does not support the various alternatives that were analyzed in Chapter 5, *Alternatives*, of the Draft EIR. This comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Comment 11-4

Alternative 4, if implemented, would severely impact to the operations of our campus. Our private alley, between Venice Boulevard and Washington Boulevard, is a bi-directional means for ingress

and egress serving for all types of vehicles, including daily trash haulers, furniture delivery trucks of all sizes, including 55 foot trailers, employees and our patrons. Moreover, our private alley is also a life safety exit path for our patrons on foot.

We do not support the removal of office-related vehicular access from Washington Boulevard, Alterative 4, serving the Project. Strangely, the DEIR does not mention if our ingress and egress to our property would be restricted as well. We must ensure the ability to continuously use our private alley is not compromised and that the new Project Access Alley does not create hazardous traffic conditions, especially at the signalized intersection of Washington Boulevard and Wesley Street.

The access to this Project, bounded on three sides by three significant boulevards, needs to be shared equally. If Washington Boulevard access was restricted, and the vehicular loads are shifted to the Venice Boulevard as the dominant access point, as noted above, our ability to continuously use our private alley would be compromised and that the new Project Access Alley would create hazardous and confusing traffic conditions.

Response to Comment 11-4

This comment expresses opposition to removal of office-related vehicular access from Washington Boulevard proposed in Alternative 4. Opposition to this alternative is noted. Note that neither the Project nor any of the access alternatives studied in the Transportation Impact Study would alter the existing Helms alley or restrict access into or out of the Helms Bakery complex at either end of the Helms alley. The City of Culver City requested examination of the access alternatives limited to the Project Site. The final site circulation use of the proposed new alley on the Project Site, immediately abutting the existing private alley, is not finalized and the Applicant will continue to coordinate with the commenter and his representatives.

Comment 11-5

The introduction of the signal on Venice Boulevard, Alternative 4, not only skews the distribution and intersection volumes, but introduces impacts. The potential for cut-through traffic from Ivy Street in Los Angeles, north of Venice Boulevard, is real. The creation of hazardous conditions between in-coming vehicles to our campus and exiting vehicles from the Project are concerning. Moreover, the traffic volumes along Venice Boulevard are returning to the 2019 levels and as such, during peak traffic hours, we foresee queues exiting the Project with nowhere to merge into a clogged westbound Venice Boulevard.

Response to Comment 11-5

This comment suggests that the introduction of a signal on Venice Boulevard, as contemplated by Alternative 4, introduces new impacts related to cut-through traffic and hazardous conditions. The potential for cut-through traffic north from the Project onto Ivy Street was analyzed in Appendix F of the Transportation Impact Study prepared for the Project and provided in Appendix M of the Draft EIR. Note that while minor revisions have been made to the Transportation Impact Study as part of this Final EIR (see Chapter 3, *Revisions, Clarifications and Corrections to the Draft EIR*), no changes were made with regard to the cut-through traffic analysis. As discussed therein, cut-through traffic was not found to surpass the threshold set by the City of Los Angeles for significant

impacts to neighborhood streets. Project trips to and from the north of the Project Site gain little, if any, travel time benefit from using Ivy Street as a cut through, because it is a lower-speed neighborhood street with additional stop-controlled intersections before reaching another street that leads out of the area (i.e., Cattaragus Avenue to the east or National Boulevard to the west). Furthermore, it is possible to design the new signalized intersection such that movements between the Project driveway and Ivy Street (north-south across the intersection) would be prohibited whether by signage or even physically restricting Ivy Street access to right turns only, which is effectively the existing condition. This consideration was raised with LADOT in discussion when developing this access alternative, but for conservative non-CEQA traffic analysis, assumptions were included for neighborhood cut-through traffic.

Although traffic volumes have continued to rise in recent months as compared to pandemic lows, the regional congestion levels remain lower than 2019 levels. The traffic counts collected in May 2022 reflect the beginning of the return-to-office trend while schools were still in session. The analysis includes a future and horizon year forecast adjustment to these volumes to identify potential queueing issues as traffic volumes grow. Alternative 4 does indeed change the distribution and volumes of the Project, but the overall outcome for traffic circulation in the area is positive compared with the base Project access because it does not require all Project trips to exit to the east and then requiring dozens of trips to circulate around the block if their ultimate destination is to the west or south. Alternative 4 provides a more direct path of travel and therefore reduces the number of intersections affected by Project trips. If a shared alley configuration is agreed upon for the Project Site and Helms alley, Alternative 4 would also benefit vehicles using the adjacent existing private alley which today are also not able to turn left onto Venice Boulevard.

Comment 11-6

See the attached photos taken today depicting morning traffic volumes as vehicles are backed up beyond the signalized intersection at Helms Avenue, east of the Project.

Response to Comment 11-6

This comment depicts morning traffic volumes at the signalized intersection at Helms Avenue, east of the Project Site. Note that the City of Los Angeles traffic signals on Venice Boulevard are linked to the City's centralized adaptive traffic network, Automated Traffic Surveillance and Control (ATSAC), and a single-day observation particularly following nearly two years of highly unusual traffic flows does not necessarily represent typical operations. The City's traffic signal system adapts over time to changing conditions, and traffic patterns continue to change in this area as people return to driving to work and school. Furthermore, the Applicant has already been in and will continue discussions with LADOT regarding Project access to ensure traffic operations are optimized to the extent possible. Finally, the Project is adjacent to one of the most significant transit hubs in the western portion of the County of Los Angeles. As traffic congestion returns to pre-pandemic levels and individuals begin to develop or redevelop commute habits, people will begin returning to transit at a greater rate. If Venice Boulevard and Washington Boulevard are saturated with vehicles, people will choose travel alternatives that the Cities of Los Angeles and Culver City have begun to prioritize, including transit and bicycling.


Helms Av
Helms Av

Comment 11-7

It is unclear if the Project considered the City of Los Angeles's "Venice Boulevard Safety and Mobility" project (https://ladotlivablestreets.org/projects/venice). This plan will create a new, dedicated bus lane along Venice Boulevard, west of National Boulevard, west of the Project. Thus, westbound Venice traffic will lose a vehicle lane, known to the lay as a bottleneck. This situation will result in an increase in vehicular backup along Venice Boulevard, east of the Project and east of Helms Bakery. This condition conflicts with, and exacerbates, the goals of any introduction of a signal at the Project Access Alley.

Response to Comment 11-7

This comment states that it is unclear if the City of Los Angeles's "Venice Boulevard Safety and Mobility" project was considered in the Project transportation analysis. The Venice Boulevard Safety and Mobility project was not publicly known at the time the City issued the Notice of Preparation, so the reconfiguration of Venice Boulevard lanes west of National Boulevard was not included in the Project transportation analysis. Alternative 4 seeks to minimize Project trip circulation around the block as a result of driveways being right-in/right-out only, and the creation of a bus lane on Venice Boulevard would not conflict with that goal. In fact, allowing signalized left turns out of the site would be a better outcome for both the Project Site and bus operations on Venice Boulevard because it eliminates more than 100 trips that would turn right onto Venice Boulevard and then need to turn right again onto Hutchison Avenue to circulate around the block back to the intended direction.

Comment 11-8

This letter, as well as our letter dated, December 17, 2021, brings to light the City's need to further study all access related impacts realized by this Project. Thank you.

Response to Comment 11-8

This comment provides a general conclusion to this correspondence. The comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is warranted.

Public Meeting Comments (PMC)

Questions from the Public Meeting on the Draft EIR
Received August 16, 2022

Comment PMC-1

Ken Mand: Thank you, everybody. I just want to say thank you to the project team for the studying and its apparent advancement of the possibility for mobility or transportation alternative number one, utilizing the new traffic signal up on Venice. It really is something that is very important to the residents of Culver City and the Arts District that the vehicles come in off of Venice and just want to you know, for the record, you know, thank you guys and very much support both transportation alternative number one and, should there be any opportunity to meet with DOT, which sounds like it might be the last hurdle within getting that fully implemented into the project, I'm happy to meet and share some perspective with the team, thank you.

Response to Comment PMC-1

This comment acknowledging support for the first alternative access option (i.e., signalized Venice Driveway Alternative) analyzed in the Transportation Impact Study and studied in the Draft EIR as Alternative 4 is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PMC-2

Jillian Gotlib: Thank you so much, I would like to just comment that right now we are on reduced transportation lanes on Washington Boulevard going east and west at that juncture. I'm curious will there be a light at that little alley for the ingress and I encourage there to be also traffic light at Venice on the opposite side and that all of the major trucks delivering supplies and construction, you know opportunities, would be incoming from Venice and not on Washington. We have a tremendous amount of back traffic and a big traffic jam there already. Thank you.

Response to Comment PMC-2

This comment raises questions regarding traffic signals and truck haul routes. Specifically, this comment inquires whether there will be a traffic signal at the driveway on Washington Boulevard. A traffic signal was not proposed as part of the Project. This comment also encourages there to be a traffic light at the driveway on Venice Boulevard. As noted in Chapter 5, *Alternatives*, of the Draft EIR, Alternative 4 analyzes the potential for a traffic signal on Venice Boulevard at the intersection of Venice Avenue and the proposed driveway along Venice Boulevard. With regard to haul routes, this comment requests that all of the major trucks delivering supplies and construction be incoming from Venice Boulevard and not Washington Boulevard. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PMC-3

Michael Monagan: I just wanted to voice my support for transportation alternative number one, and thank you Apple for being flexible on this and developers. So that's it. Thank you.

Response to Comment PMC-3

This comment acknowledging support for the first alternative access option (i.e., signalized Venice Driveway Alternative) analyzed in the Transportation Impact Study and studied in the Draft EIR as Alternative 4 is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PMC-4

Steve Webb: Thank you very much for the report. Clearly, one of the major issues is going to be construction traffic in the short term, and I understand you're going to have a construction management plan supposedly to deal or mitigate these issues. Will we be given the opportunity to review and comment on that construction management plan? Well, that that's my comment, I think that that there are some important businesses on Washington Boulevard that can be severely impacted relative to construction and we'd like the opportunity to review and comment on it. Thank you.

Response to Comment PMC-4

This comment regarding opportunities for public review and comment of the construction management plan is noted. As provided in Project Design Feature TRAF-PDF-1, prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the surrounding community with information on the FCMP.

Comment PMC-5

Kenji Haroutunian: I appreciate Apple by investing in our neighborhood and I am in support of transportation option number one that prioritizes Venice Boulevard as the entre [*sic]* ingress and out. That's my comment. Thank you.

Response to Comment PMC-5

This comment acknowledging support for the first alternative access option (i.e., signalized Venice Driveway Alternative) analyzed in the Transportation Impact Study and studied in the Draft EIR as Alternative 4 is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PMC-6

Stacey Hardkey: Hi, I just wanted to reiterate what's already been said. Apple, thank you so much for your consideration of our neighborhood it really means a lot to us that you're being so open minded to our requests. I want to reiterate my support for the proposal to have the ingress and egress on Venice Boulevard and also reiterate again that, if we could mitigate the traffic, so that is

focused on Venice and alleviate the pressure that's already existing on a neighborhood on Washington Boulevard we'd be so very grateful Thank you so much for your time.

Response to Comment PMC-6

This comment acknowledging support for the first alternative access option (i.e., signalized Venice Driveway Alternative) analyzed in the Transportation Impact Study and studied in the Draft EIR as Alternative 4 is noted. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

CHAPTER 3
Revisions, Clarifications, and Corrections to the Draft EIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132 (a), this Chapter of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These changes and additions are due to recognition of inadvertent errors or omissions, and to respond to comments received on the Draft EIR during the public review period. The changes described in this Chapter do not add significant new information to the Draft EIR that would require recirculation of the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. CEQA Guidelines Section 15088.5 specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

CEQA Guidelines Section 15088.5 also provides that "[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

As demonstrated in this Final EIR, the changes presented in this Chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft EIR are indicated below under the respective EIR section heading, page number, and paragraph. Paragraph reference is to the first full paragraph on the page. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline.

Executive Summary

1. Page ES-4 and ES-5, revise the last sentence beginning on page ES-5 as follows:

Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor residential units at receptor locations R1, R2, and R3 ~~to the west of the Project Site~~, construction noise would remain significant and unavoidable.

2. Page ES-19, under Project Design Feature NOISE-PDF-8, revise the 6th sentence as follows:

Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section ~~111.02~~ 112.01, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction.

3. Page ES-19, under Project Design Feature TRAF-PDF-1, revise the 3rd sentence in the first paragraph as follows:

The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning ~~managers~~ staff for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

4. Page ES-22, under Project Design Feature TRAF-PDF-2, revise the seventh bullet point as follows:

Intercampus Shuttles: The Project will provide on request a~~nd~~ fixed route intercampus shuttles between other Apple-occupied buildings ~~occupied by the Applicant~~ during work hours, as well as commuter shuttles from select points in and around the Los Angeles basin to the Project site during morning and evening commute hours.

5. Page ES-25 and ES-25, revise Mitigation Measures CUL-MM2 and CUL-MM-3 as follows:

CUL-MM-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries

in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City ~~(City)~~ and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City~~(City)~~ and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resource(s). The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City of Culver City or City of Los Angeles, depending on the location/jurisdiction where the resource is located. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be

implemented that is at least as equally effective to mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

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

6. Page ES-26, revise Mitigation Measure GEO-MM-3 as follows:

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

7. Pages ES-27 through ES-28, under Mitigation Measure HAZ-MM-2 beginning at the last paragraph, revise as follows:

The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction. For example, as part of the vapor intrusion evaluation, at least two rounds of indoor and garage air sampling (including the parking level 1 office space) shall be conducted post-construction and prior to occupancy of the Project to confirm that future workers, valet parking personnel, and workers within the parking level 1 office space are adequately protected and potential human health risks due to vapor intrusion are at or below target risk levels established by DTSC, as applicable.

Sampling activities shall include collection of samples when the HVAC system is on and off and also when the parking garage ventilation system is on and off. Given that benzene is a component of gasoline and will be present in the garage due to the parked cars, the air sampling activities shall focus on PCE to confirm that residual PCE in soil vapor does not pose a significant vapor intrusion risk to office workers, valet parking personnel, and workers working within the parking level 1 office space. The first round of sampling should be conducted before the buildings are occupied and the garages are in use. These air sampling activities will aid in the evaluation of the efficacy of the liner and the garage itself to mitigate vapor intrusion. These sampling activities will also help evaluate if any preferential pathways (e.g., utility conduits and elevator shaft) need to be addressed. The second round of sampling shall be conducted either 1) after preferential pathways have been mitigated, if any are identified based on the first round of sampling, 2) during the summer months if the first round of sampling was conducted during the fall or winter and air concentrations were below screening levels, 3) or a few months after the first round if it was conducted during the spring or summer and air concentrations were below screening levels. In the event the indoor air data indicate that risks are above target DTSC risk levels, as applicable, after pathways are sealed, the garage's ventilation system shall be adjusted to reduce vapor intrusion levels below acceptable risk levels, as applicable.

8. Page ES-28, under Mitigation Measure NOISE-MM-1, add the below sentence to the end of the mitigation measure as follows:

At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions. The study will include a fencing/sound barrier plan for City review.

9. Pages ES-29 and ES-30, revise Mitigation Measure TCR-MM-1, TCR-MM-2 and TCR-MM-3 as follows:

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

Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native

American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.

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

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

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

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

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the

Applicant and the City of Culver City and/or City of Los Angeles. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City of Culver City and/or City of Los Angeles shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.

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

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

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

Chapter 2, Project Description

1. Page 2-8, Update Figure 2-3, Revised Conceptual Site Plan, to remove the shuttle bus cut-out along National Boulevard.

See updated Figure 2-3 on following page.

2. Page 2-13, revise the 4th sentence in the first paragraph as follows:

The Project would ~~dedicate~~ provide 13-15 feet along National Boulevard for a 7-foot-deep, landscaped parkway and 6-8-foot sidewalk.

3. Page 2-16, revise the fourth paragraph as follows:

The Project Site would be served by an existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Station. The shuttle would run between 8 a.m. and 6 p.m., Monday through Friday, with a 10-minute to 15-minute frequency. Specific pick-up/drop-off locations might include other Apple-occupied buildings in the area and the Culver City Station transit drop-off location on Robertson Boulevard. There would be ~~two~~ a curbside cut-out~~s~~ on Venice Boulevard to serve as pick-up and drop-off area~~s~~

SOURCE: Gensler, 2022

Crossings Campus

Revised Figure 4-2
Conceptual Site Plan

ESA

for the Project Site.~~, one located in front of Building 1 on National Boulevard, and the other in front of Building 2 along Venice Boulevard.~~ The employee shuttle stop would be designed with sufficient distance as to not interfere with the function of the municipal bus stop located on the southeast corner of the Venice and National Boulevard intersection. Additionally, the Project Site would be served by future commuter shuttle service, providing employee transportation from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours.

4. Page 2-20, under Project Design Feature NOISE-PDF-8, revise the 6th sentence as follows:

Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section ~~111.02~~ 112.01, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction.

5. Page 2-21, under Project Design Feature TRAF-PDF-1, revise the 3rd sentence in the first paragraph as follows:

The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning ~~managers~~ staff for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

6. Page 2-23, under Project Design Feature TRAF-PDF-2, revise the 6th bullet point on this page as follows:

Intercampus Shuttles: The Project will provide on request a~~nd~~ fixed route intercampus shuttles between other Apple-occupied buildings ~~occupied by the Applicant~~ during work hours, as well as commuter shuttles from select points in and around the Los Angeles basin to the Project site during morning and evening commute hours.

Section 4.1, Aesthetics

1. Page 4.1-23, revise the 2nd sentence in the first full paragraph as follows:

The Project would provide streetscape improvements, including a double row (colonnade) of trees along Venice Boulevard's 29-foot-deep public right-of-way. The Project would provide 13-15 feet along National Boulevard for a 7-foot-deep, landscaped parkway and 6-8-foot sidewalk.

Section 4.2, Air Quality

1. Page 4.2-38, revise second full paragraph as follows:

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

2. Page 4.2-38, revise fourth full paragraph as follows:

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

3. Page 4.2-39, revise first full paragraph as follows:

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

4. Pages 4.2-39 through 4.2-40, starting with the last paragraph as follows:

The Project would be consistent with the City of Los Angeles General Plan Air Quality Element and Plan for a Healthy Los Angeles. As the City of Los Angeles General Plan Air Quality Element would seek to reduce reliance on single occupancy vehicle trips, the Project would be consistent

with this goal Th through its location near public transit, project design, and TDM Program. As described above and in Section 4.12, *Transportation*, of this Draft EIR, the Project would provide bicycle access and on-site bicycle parking facilities, pedestrian access, an existing fixed-route intercampus shuttle program with connection to the Metro "E" Line Station, future commuter shuttle service, and various on-site amenities and financial incentives as part of a TDM Program. The TDM Program would cover TDM Support Services, Marketing and Communications, Public Transit, Rideshare, Bicycling, Walking, Pre-tax Commuter Benefit, Commuter Club, Commute Expert Program, Guaranteed Ride Home Program, Intercampus and Commuter Shuttles, Campus Bike Share Program, and On-Site Services. The TDM Program would support a safe neighborhood, consistent with the Plan for a Healthy Los Angeles, by providing a Guaranteed Ride Home Program and these other resources. As part of the TDM Support Services, the Project would offer tailored trip planning assistance with in-house TDM coordinators. The Project would also provide a comprehensive website detailing up-to-date alternative transportation options as part of a Commute Program to share with employees on a regular basis. This would improve awareness between personal behavior and air pollution in efforts to reduce air pollution, which is consistent with the goals of the City of Los Angeles Air Quality Element. Furthermore, it would cohesively address land use, transportation, and air quality.

5. Page 4.2-41, revise second full paragraph as follows:

Individual construction activities with different types of off-road heavy-duty construction equipment and numbers of vehicle trips (workers, vendors and haul trips) will overlap over the 3-year construction period and was considered in determining the maximum daily emissions for the air quality impact analysis. For example, the foundation/concrete pour and general construction of Building 1 will occur at the same time as the excavation activities for Building 2. Similarly, during the construction of both buildings there will be days where general building construction activities, architectural coating and paving will all occur. The estimated maximum daily emissions were calculated by reviewing the schedule overlaps and determining which concurrent activities resulted in the maximum daily emissions. The overlapping activities were evaluated for each pollutant independently to determine each pollutant's maximum daily emissions. The activities resulting in the maximum daily VOC emissions, for example, involve architectural coating and paving phases, while the days and activities resulting in the maximum daily NO_X emissions are those with intensive heavy-duty equipment usage and large numbers of haul and vendor trucks. The landfill site for soil haul is approximately 30 miles from the Project Site and on-road emissions from soil haul trucks contribute heavily to the regional emissions from the Project during days where large amounts of soil are exported. These maximum daily emissions do not represent the emissions that would occur every day during Project construction, which would be lower on construction days under typical or below average construction activity conditions. Note, in the event that contaminated soils containing hazardous materials are encountered during excavation of the Project, soils would need to be hauled to the Kettleman Hills Hazardous Waste Facility, located approximately 182 miles from the Project Site. Preliminary soil data indicates approximately 75 cubic yards of material that could potentially contain hazardous materials above the applicable Total Threshold Limit Concentration (TTCL) limits. If hazardous materials above the applicable TTCL limits are found, approximately 1 to 2 trucks per day would be required to transport the material to the Kettleman Hills Hazardous Waste Facility. This would result in a maximum of 2 haul trucks per day to travel

approximately 70 miles within the South Coast Air Basin and 112 miles in the San Joaquin Valley Air Basin. These potential extended haul truck trips are accounted for in the analysis. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

6. Pages 4.2-42 through 4.2-43, revise Table 4.2-6, lines 5, 15, 16, 25, 29, 30, 31, 32, 40, and 43 as follows:

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

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
Construction Sub-Phases						
B1 Grading/Excavation 2023	3	46~~45~~	28	<1	4	2
B2 Grading/Excavation 2023	4	59~~58~~	40	<1	5	2
B2 Grading/Excavation 2024	4	56~~55~~	40	<1	5	2
Site Preparation (B1), Grading/Excavation (B1) – 2023	4	60~~59~~	43	<1	5	2
Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2) – 2023	13	127~~126~~	104	<1	9	5
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2023	13	126~~125~~	105	<1	10	5
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2024	13	122~~121~~	104	<1	10	5
Building Construction (B1), Grading/Excavation (B2) – 2024	6	72~~71~~	61	<1	7	3
Maximum Daily Emissions[c]	40	127~~126~~	105	<1	10	5

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

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

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

[c] Note that for haul truck trips occurring in the San Joaquin Valley Air Basin, which is within the San Joaquin Air Pollution Control District (SJVAPCD), resulting emission were calculated to be approximately 0.02 tons of NOx per year. This is well below the the 10 tons per year threshold under the SJVAPCD. The increase in maximum daily emissions of other ozone precursor and criteria air pollutants (VOC, CO, SO_2, PM10, and PM2.5) would also be similarly small in magnitude and would be well below the SJVAPCD annual significance thresholds.

SOURCE: ESA, 2022.

7. Pages 4.2-47 through 4.2-48, revise Table 4.2-9, lines 5, 15, 16, 25, 29, 30, 31, 32, 40, and 43 as follows:

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

Source	VOC	NO_X	CO	SO2	PM10[b]	PM2.5[b]
B1 Grading/Excavation 2023	1	31~~30~~	40	<1	4	1
B2 Grading/Excavation 2023	2	38~~37~~	58	<1	4	1
B2 Grading/Excavation 2024	2	38~~37~~	58	<1	4	1
Site Preparation (B1), Grading/Excavation (B1) – 2023	2	34~~33~~	57	<1	4	1
Foundations/Concrete Pours (B1), Site Preparation (B2), Grading/Excavation (B2) – 2023	9	88~~87~~	125	<1	7	3
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2023	10	93~~92~~	124	<1	8	4
Foundations/Concrete Pours (B1), Building Construction (B1), Grading/Excavation (B2) – 2024	10	91~~90~~	123	<1	8	4
Building Construction (B1), Grading/Excavation (B2) – 2024	3	46~~45~~	80	<1	5	2
Maximum Daily Emissions[c]	38	93~~92~~	125	<1	8	4

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

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

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

[c] Note that for haul truck trips occurring in the San Joaquin Valley Air Basin, which is within the San Joaquin Air Pollution Control District (SJVAPCD), resulting emission were calculated to be approximately 0.02 tons of NOx per year. This is well below the the 10 tons per year threshold under the SJVAPCD. The increase in maximum daily emissions of other ozone precursor and criteria air pollutants (VOC, CO, SO_2, PM10, and PM2.5) would also be similarly small in magnitude and would be well below the SJVAPCD annual significance thresholds.

SOURCE: ESA, 2022.

Section 4.3, Cultural Resources

1. Pages 4.3-38 and 4.3-39, revise Mitigation Measures CUL-MM2 and CUL-MM-3 as follows:

CUL-MM-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of

the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City ~~(City)~~ and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City~~(City)~~ and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resource(s). The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact; or (4)

not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

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

Section 4.4, Energy

1. Pages 4.4-28 through 4.4-29, revise starting last paragraph as follows:

The Project would concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. The Project is well serviced by transit, the existing fixed-route intercampus shuttle program, future commuter shuttle service, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) E Line and several bus routes serviced by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro E Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, Santa Monica Big Blue Bus Line 17, and LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program and future commuter shuttle service as part of the Project's TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, which runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project (also known as the Tactical Mobility Lane Pilot project), dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular fuel consumption. In addition, the Project will promote alternatives to conventionally fueled automobiles by installing 122 EV charging stations.

2. Pages 4.4-33 through 4.4-34, revise last paragraph as follows:

The Project would concentrate office uses within an HQTA in an urban infill location in proximity to multiple public transit stops. The Project is well serviced by transit, the existing fixed-route

intercampus shuttle program, future commuter shuttle service, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metro E Line and several bus routes serviced by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro E Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, Santa Monica Big Blue Bus Line 17, and LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle ~~program~~ service and future commuter shuttle service as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, which runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular fuel consumption. In addition, the Project would promote alternatives to conventionally fueled automobiles by installing 122 EV charging stations.

3. Page 4.4-36, revise first full paragraph as follows:

The Project would also be consistent with and not conflict with regional planning strategies that address energy conservation. As discussed above and in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focus on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's design and its location on an infill site within an HQTA in proximity to transit; its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations; and its walkable environment would achieve a reduction in VMT. These land use characteristics are included in the transportation fuel demand for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in Section 4.2*, Air Quality,* and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would also benefit from fuel and automotive manufacturers' compliance with CAFE fuel economy standards and the Pavley Standards, which are designed to result in more efficient use of transportation fuels. In addition, the existing fixed-route intercampus shuttle ~~program~~ service and future commuter shuttle service as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project.

Section 4.5, Geology and Soils

1. Page 4.5-28, revise Mitigation Measure GEO-MM-3 as follows:

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

Section 4.6, Greenhouse Gas Emissions

1. Page 4.6-46, revise Table 4.6-6, line 1 as follows:

CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. GHG emissions generated by transit trips by Project employees and the existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Station and the future commuter shuttle service that would transport employees from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours as designated by the TDM Program, as required by Project Design Feature TRAF-PDF-2, would be reduced under this regulation.

2. Page 4.6-47, revise Table 4.6-6, line 1 as follows:

SB 375 requires SCAG to direct the development of the RTP/SCS for the region, which is discussed in this Draft EIR. The Project would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern, as further discussed below in Table 4.6-7. The Project would be constructed on an existing developed site and would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's development pattern or transportation network. As shown in the VMT Calculator in Appendix B, the Project is anticipated to generate approximately 3,786 average daily weekday vehicle trips. The Project is located less than one-tenth of a mile from the Metro "E" Line Culver City Station across National Boulevard from the Project Site and well within a key Transit Priority Area (TPA). Therefore, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT. As part of Project Design Feature TRAF-PDF-2, the Project would be served by an existing fixed-route intercampus shuttle program that would transport employees between Apple buildings in Culver City and the Metro "E" Line Culver City Station as well as the future commuter shuttle service that would transport

employees from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours, which would further reduce VMT. As such, the Project would not conflict with the VMT reduction standards of the 2020–2045 RTP/SCS. Thus, the Project would be compliant with, and would not conflict with, applicable 2020–2045 RTP/SCS actions and strategies to reduce GHG emissions.

3. Page 4.6-51, revise last paragraph as follows:

As similarly described in Section 4.12, *Transportation*, the Project is well served by transit, the existing fixed-route intercampus shuttle program, future commuter shuttle service, and bicycle/pedestrian facilities. With regard to public transit, the Project Site and Study Area are currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program and the future commuter shuttle service that would transport employees from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours between Apple buildings in Culver City and the Metro "E" Line Station as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project. In addition, the Project is served by the Ballona Creek Bike Path, a Class I facility, that runs approximately 0.75 miles south of the Project Site, and Class II bike lanes along Venice Boulevard, providing a connection to the Ballona Creek Bike Path via a Class I shared-use bike path on National Boulevard. Under the MOVE Culver City pilot project, dedicated bus and bicycle lanes were installed along Washington and Culver Boulevards, along with new bus-only traffic signals and bicycle signals. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective city codes. All of the streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions, and would not conflict with the VMT Reduction Strategies and Policies of the 2020–2045 RTP/SCS.

4. Page 4.6-52, revise first full paragraph as follows:

As described above, the Project would concentrate office spaces in an area served by several transit providers within the immediate vicinity of the Project Site. The 2020–2045 RTP/SCS focuses on orienting job growth in Priority Growth Areas served by high quality transit and into other infill areas where urban infrastructure including housing and other services already exists. The Project supports this by locating office spaces in an area well served by public transit, an existing fixed-route intercampus shuttle program, future commuter shuttle service, and bicycle/pedestrian facilities. Furthermore, the Project would also provide 175 bicycle spaces. Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions, which would not conflict with the goals of the 2020–2045 RTP/SCS.

5. Page 4.6-55, revise Table 4.6-7, line 1 as follows:

No Conflict. While this action applies to local jurisdictions, SCAG and CTCs, the Project is currently served by the Metro "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle as well as the future commuter shuttle service that would transport employees from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours between Apple buildings in Culver City and the Metro "E" Line Station as part of the TDM Program, as required by Project Design Feature TRAF-PDF-2, would reduce single occupancy vehicle trips and VMT associated with the Project.

6. Page 4.6-57, revise Table 4.6-8, line 8 as follows:

No Conflict. While this action applies primarily to the City, the Project would encourage the use of transit as the Project Site and Study Area are currently served by the Metro "E" Line and several bus routes served by Metro, Culver City Bus, Big Blue Bus, and LADOT. Existing transit lines include Culver City Bus Line 1, 4, 5, 7, Metro "E" Line, Metro Bus Line 33, 35/38, 37, 105, 217, 617, and Santa Monica Big Blue Bus Line 17, LADOT Commuter Express Route 431 and 437A. The local and regional bus line services and the existing fixed-route intercampus shuttle program between Apple buildings in Culver City and the Metro "E" Line Station as well as the future commuter shuttle service that would transport employees from select points in and around the Los Angeles basin to the Project Site during morning and evening commute hours as part of the TDM Program would reduce single occupancy vehicle trips. The Project would reduce VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. The Project would also provide 175 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes.

Section 4.7, Hazards and Hazardous Materials

1. Page 4.7-24, revise first full paragraph as follows:

The Project includes the excavation of soil to construct three levels of underground parking garages under each building. As discussed above in the Existing Conditions subsection, soil vapor, groundwater, indoor air, and outdoor air samples were collected and analyzed for chemicals of potential concern identified for the Phase I ESA. Testing revealed the presence of PCE in sub-slab soil vapor samples in the northern portion of the Project Site (beneath Venice Boulevard buildings) at concentrations above its vapor intrusion screening level for commercial land use. Follow-up indoor air sampling did not identify PCE or other VOCs at concentrations above their respective screening levels for commercial land use, although PCE was detected at measurable concentrations in indoor air samples. The presence of PCE in soil vapor has the potential to exceed environmental screening levels, but is unlikely to exceed the multiple orders of magnitude higher OSHA construction worker respiratory standards. Although PCE was not detected at concentrations above

its indoor air screening level, PCE was detected above detection limits and only a limited number of samples were collected as part of the screening-level soil vapor survey; higher concentrations of PCE may be present in soil vapor in areas not sampled. Based on the presence of PCE in soil vapor, this is a potentially significant impact and mitigation measures are provided below. The prescribed mitigation measures to be implemented prior to Project operation would address potential impacts to construction workers and future on-site workers.

2. Page 4.7-26, revise second full paragraph as follows:

Although the chemicals detected in groundwater and sub-slab soil vapor samples (i.e., PCE, benzene, toluene, ethylbenzene, xylenes, and naphthalene) were not detected in indoor air samples at concentrations above their respective indoor air screening levels for commercial use, the chemicals were detected above laboratory reporting limits; higher concentrations of the chemicals may be present in soil, soil vapor and groundwater in areas not sampled. However, the excavation of fill and soil to 50 feet below ground surface for the underground parking garages would result in the removal of all fill and soil, along with any contaminants in the fill and soil beneath the buildings, thus removing the potential sources for the PCE in soil vapor and indoor air. Nonetheless, as stated in Mitigation Measure HAZ-MM-2, the Project's Soil and Groundwater Management Plan (SGMP) would provide measures for the reevaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with applicable regulatory procedures and performance standards. In addition, because the excavation for the underground parking garages would be to about 50 feet deep, below the 28.5 to 33-foot depth to groundwater, each parking garage would require the installation of a groundwater barrier, i.e., a water-proof liner, to prevent groundwater from entering the garages. The groundwater barrier would also serve to prevent intrusion of vapors from the groundwater surface into the indoor air of the structures and reduce the related groundwater impact to less than significant.

3. Page 4.7-26, revise the last paragraph as follows:

To reduce ~~the~~ potential impacts to the public or the environment from ~~to construction workers during the excavation and handling of contaminated~~ hazardous materials, the Applicant shall implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2.

4. Page 4.7-28, under Mitigation Measure HAZ-MM-2, revise the second paragraph as follows:

The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor

intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction. For example, as part of the vapor intrusion evaluation, at least two rounds of indoor and garage air sampling (including the parking level 1 office space) shall be conducted post-construction and prior to occupancy of the Project to confirm that future workers, valet parking personnel, and workers within the parking level 1 office space are adequately protected and potential human health risks due to vapor intrusion are at or below target risk levels established by DTSC, as applicable. Sampling activities shall include collection of samples when the HVAC system is on and off and also when the parking garage ventilation system is on and off. Given that benzene is a component of gasoline and will be present in the garage due to the parked cars, the air sampling activities shall focus on PCE to confirm that residual PCE in soil vapor does not pose a significant vapor intrusion risk to office workers, valet parking personnel, and workers working within the parking level 1 office space. The first round of sampling shall be conducted before the buildings are occupied and the garages are in use. These air sampling activities will aid in the evaluation of the efficacy of the liner and the garage itself to mitigate vapor intrusion. These sampling activities will also help evaluate if any preferential pathways (e.g., utility conduits and elevator shaft) need to be addressed. The second round of sampling shall be conducted either 1) after preferential pathways have been mitigated, if any are identified based on the first round of sampling, 2) during the summer months if the first round of sampling was conducted during the fall or winter and air concentrations were below screening levels, 3) or a few months after the first round if it was conducted during the spring or summer and air concentrations were below screening levels. In the event the indoor air data indicate that risks are above target DTSC risk levels, as applicable, after pathways are sealed, the garage's ventilation system shall be adjusted to reduce vapor intrusion levels below acceptable risk levels, as applicable.

5. Page 4.7-29, revise the first full paragraph as follows:

To ensure the proper management of contaminated soils and to reduce the potential risk of impacts to construction workers, the public (inclusive of future on-site workers), or the environment, the Project would be required to implement Mitigation Measure HAZ-MM-1, which requires the preparation and implementation of a site-specific HASP in accordance with federal and State OSHA regulations, and Mitigation Measure HAZ-MM-2, which requires the preparation and implementation of a SGMP prior to and during Project construction. Groundwater management is included because three levels of below grade parking would be constructed, which would encounter groundwater known to be contaminated. The implementation of these mitigation measures would reduce impacts to a less than significant level.

Section 4.9, Land Use and Planning

1. Page 4.9-25, revise last paragraph as follows:

The Project would provide for the widening and landscaping of existing sidewalks on National and Venice Boulevards,. The Venice Boulevard sidewalk (with parkway) varies up to 25 feet and would be completed to 28 feet under the Project. The National Boulevard sidewalk and parkway is seven feet and would be completed to 15 feet under the Project. The Venice Boulevard sidewalk would include double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. The National Boulevard sidewalk improvements would ~~more than double~~ significantly expand the

existing 7-foot sidewalk and parkway by providing a~~n~~ 6-8-foot sidewalk and a 7-foot parkway. The improvements would be continuous along National Boulevard both in the City of Los Angeles and Culver City. . In addition, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,326 sf of which would be landscaped. This open space area would be located off Washington Boulevard and would enhance the visual character of Washington Boulevard between the Helms Bakery Complex and National Boulevard. The Project would also include 51,600 sf internal courtyard (available to Project employees), of which 39,000 sf would be landscaped. Therefore, the Project would not conflict with policies to extend the City's parklike qualities through streetscape and urban design improvements to create a sustainable urban forest, to enhance Culver City's impact and quality of life, to protect and expand Culver City's open space resources, and to provide passive recreational open space within walking distance of all City neighborhoods.

2. Page 4.9-27, revise last paragraph as follows:

The Project's proximity to the Metro "E" Line Culver City Station and a range of exiting bus routes, as well as a variety of transit options, ~~a shuttle program~~ an intercampus and commuter shuttle program, cycling, and walking, would reduce the need for automobile use and would reduce per capita vehicle miles. With the potential for the reduction in automobile use, the Project would not conflict with policies to reduce air pollution, asthma rates, and greenhouse gas emissions or with policies to reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.

3. Page 4.9-29, revise first full paragraph as follows:

As discussed in Section 4.12, *Transportation*, of this Draft EIR, the Project would also not conflict with the applicable policies of the General Plan Circulation Element as required by the Redevelopment Plan. The Project would provide for widening and landscaping of existing sidewalks on National and Venice Boulevards, including the provision of double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and adjacent planting and turf varying from 9 feet to 14 feet in width and second inside sidewalk of varying from 6 feet to 11 feet, for a total sidewalk/parkway dimension of 25 feet. Under the Project, the sidewalk/parkway would be improved to an 8-foot landscaped parkway, 13 feet of sidewalks, and 7-foot landscaped planter for a total sidewalk/parkway width of 28 feet. National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to 6-8-foot sidewalk and 7-foot landscaped parkway. Therefore, the Project would not conflict with Redevelopment Plan policies related to the improvements and dedications of public streets and rights-of-way. The Project would also not conflict with requirements of the Redevelopment Plan that all outdoor materials and equipment such as elevator bulkheads and equipment would be screened and trash collection areas would be interior to the Project and would not be visible. The Project would also be consistent with the General Plan's maximum height requirement of 56 feet for the Culver City parcel, as well as land coverage, traffic access, setbacks, and other standards of the General Plan and, as such, would not conflict with Redevelopment Plan policies that establish limits, restrictions, and controls on development of the Project Site as required by the General Plan. Therefore, the Project would not conflict with Culver

City Redevelopment Plan policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the Redevelopment Plan would be less than significant.

4. Page 4.9-36, revise first full paragraph as follows:

As evaluated in detail in Table LU-9, *Consistency of the Project with Applicable Policies of the West Adams–Baldwin Hills–Leimert Community Plan Intended to Avoid or Mitigate an Environmental Effect*, the Project would not conflict with applicable policies of the Community Plan. The Table LU-9 evaluation is provided in Appendix J of this Draft EIR. The Project, which is designated as Community Commercial in the Community Plan, would not conflict with policies applicable to that designation. In addition, Figure 1-3, General Plan Framework Map, in the West Adams–Baldwin Hills–Leimert Community Plan shows the Project Site as located within a "Community Center (Transit-Oriented Development Area, Commercial Node)" in conformance with the General Plan Framework Element land use designation for the area and the Community Plan sets forth policies that are applicable to such Community Centers. In summary, the Project would not conflict with policies to conserve, enhance, and regenerate its "main street" character by promoting continued pedestrian orientation. The Project would incorporate sidewalk widening and improvements, install a double sidewalk and double row (colonnade) of street trees along Venice Boulevard, increase street trees and widen the Venice Boulevard sidewalk and landscaped parkway to a consistent 28 feet.[1] The Project would broaden the existing 7-foot sidewalk on National Boulevard to ~~a~~an 6-8-foot sidewalk and 7-foot landscaped parkway in both the City of Los Angeles and Culver City sections to 15 feet. provide pedestrian-oriented planting beds along the sidewalks, include broad and landscaped main entrances oriented toward the sidewalk, include glass exterior walls that provide visual access into common area building interiors, and include lighting for pedestrian security and wayfinding. The Project would enhance a pedestrian link between the retail uses in the Helms Bakery Complex and the Ivy Station development.

Section 4.10, Noise

1. Page 4.10-40, bulleted lists, revise as follows:

Haul trucks would leave the Project Site via the following routes:

- Project Site to Venice Boulevard to La Cienega Boulevard to I-10;
- Project Site to Venice Boulevard to National Boulevard to I-10;
- Project Site to Venice Boulevard to S. Robertson Boulevard to I-10;
- Project Site to Venice Boulevard to I-10; ~~and/or~~
- Project Site to Washington Boulevard to National Boulevard to I-10; and/or
- Project Site to Washington Boulevard to National Boulevard to Venice Boulevard to I-10

[1] Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and adjacent planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot, 6-inch landscaped parkway, 13 feet of sidewalk, and a 7-foot landscaped planter, for a total of 28 feet.

2. Page 4.10-54, under Mitigation Measure NOISE-MM-1, add the below sentence to the end of the mitigation measure as follows:

At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions. The study will include a fencing/sound barrier plan for City review.

Section 4.12, Transportation

1. Page 4.12-23, under Project Design Feature TRAF-PDF-1, revise the 3rd sentence in the first paragraph as follows:

The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning ~~managers~~ staff for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

2. Page 4.12-7, under Project Design Feature TRAF-PDF-2, revise the first bullet point as follows:

Intercampus Shuttles: The Project will provide on request ~~and~~ fixed route intercampus shuttles between other Apple-occupied buildings ~~occupied by the Applicant~~ during work hours, as well as commuter shuttles from select points in and around the Los Angeles basin to the Project site during morning and evening commute hours.

3. Page 4.12-28, 1st row of Table 4.12-1, revise the Project consistency analysis as follows:

No Conflict. The Project's close proximity to several public transportation options would support this policy by allowing employees to commute via alternative modes to reduce volumes. The proposed TDM Program (refer to Project Design Feature TRAF-PDF-2) would also help to reduce volumes on nearby roadways due to employee commute. The Project would also provide a new curb cut pick-up/drop-off zone on Venice Boulevard ~~and National Boulevard~~. This pick-up/drop-off zone would facilitate smoother operations on Venice Boulevard and National Boulevard by keeping pick-up/drop-off operations out of through vehicle and bike lanes.

4. Page 4.12-31, 3rd row of Table 4.12-4, revise the Project consistency analysis as follows:

No Conflict. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also proposed. Neither~~ The loading zone would not interfere with vehicles and bicycles on the surrounding street network as ~~they~~ it will allow vehicles to pull over without blocking through traffic. Off-street loading would occur adjacent to the parking garage entrance on the Los Angeles Parcel. Access to the off-street loading is available via the Venice Boulevard driveway.

5. Page 4.12-38, update the first paragraph as follows:

Pedestrian access would be provided via widened 15-foot-wide sidewalks located along the Project Site frontages on National Boulevard and Venice Boulevard. Residents and visitors arriving at the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project Site's access locations would be designed to the City's adopted standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All three proposed Project driveways will intersect with streets (Washington Boulevard, National Boulevard, or Venice Boulevard) at right angles. The driveways will also be at-grade and flat prior to intersecting with streets. Street trees placement and other potential impediments to driver and pedestrian visibility would be located in a manner that would maintain safe conditions near the Project driveways. Pedestrian entrances separated from vehicular driveways with curb and sidewalk would provide access from the adjacent streets, parking facilities, and transit stops. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly south of the National Boulevard entrance is also planned.~~ The loading zone would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes. Although this would still require vehicles to cross the bicycle lane, providing a dedicated and demarcated space congregates these curb demands into one area rather than occurring haphazardly at any location around the site, and following best practices, the bike lane would include "conflict zone" painting (a dashed or broken striping pattern) alerting riders and vehicles of the potential cross-over traffic. Such a curbside loading zone should have no effect on the pedestrian safety as it would not be located at or near a designated pedestrian crossing. The streets immediately bordering the Project Site and all the other streets in the vicinity include sidewalks, facilitating pedestrian movement. Marked crosswalks are present at all study intersections in the study area.

Section 4.13, Tribal Cultural Resources

1. Pages 4.13-8 to 4.13-10, revise Mitigation Measure TCR-MM-1, TCR-MM-2 and TCR-MM-3 as follows:

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

agreement to the City of Culver City ~~(City)~~ and City of Los Angeles prior to the issuance of demolition permit for the Project.

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

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

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

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City of Culver City and/or City of Los Angeles determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified

Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the appropriate City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

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

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

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

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

Section 4.14.3, Utilities and Service Systems

1. Page 4.14.3-8, first full paragraph, revise as follows:

Project construction would include the demolition of approximately 105,047 sf of existing buildings, approximately 3,606 cubic yards (cy) of existing hardscape; approximately 1,000 cy of existing vegetation; the export of approximately 290,000 cy of excavated soil (associated with excavation for new building foundations and subterranean parking); and new construction totaling approximately 536,000 sf. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic,

metals, and cardboard that would be disposed of in the County's inert landfill site, Azusa Land Reclamation Landfill, or one of a number of inert debris engineered fill operations that are located throughout the County. Note that any contaminated soil that is found during excavation is assumed to be diverted to the Azusa Land Reclamation Landfill ~~Chiquita Canyon Landfill~~.

Chapter 6, Other CEQA Considerations

1. Page 6-2, revise the last sentence of the 1st paragraph as follows:

Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor residential units at receptor locations R1, R2, and ~~R3 to the west of the Project Site~~, construction noise would remain significant and unavoidable.

Appendices

Appendix M, Transportation Impact Study

1. Page 24, 2nd full paragraph, revise as follows:

Pedestrian access to the Project Site would be provided via widened 15-foot-wide sidewalks located along Project Site frontages on National Boulevard and Venice Boulevard. Residents and visitors arriving at the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to the City's adopted standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All three Project driveways will intersect streets (Washington Boulevard, National Boulevard, or Venice Boulevard) at right angles. The driveways will also be at-grade and flat prior to intersecting streets. Street tree placement and the location of other potential impediments to driver and pedestrian visibility would be considered to maintain safe conditions near the Project driveways. Pedestrian entrances separated from vehicular driveways with curb and sidewalk would provide access from the adjacent streets, parking facilities, and transit stops. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also planned. The loading zones would l~~ The loading zone would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes. Although this would still require vehicles to cross the bicycle lane, providing a dedicated and demarcated space congregates these curb demands into one area rather than occurring haphazardly at any location around the site, and following best practices, the bike lane would include "conflict zone" painting (a dashed or broken striping pattern) alerting riders and vehicles of the potential cross-over traffic. Such a curbside loading zone should have no effect on the pedestrian safety as it would not be located at or near a designated pedestrian crossing. The streets immediately bordering the Project Site and nearly all the other streets in the vicinity include sidewalks, facilitating pedestrian movement. Marked crosswalks are present at all study intersections in the study area.

2. Appendix B, page 4, 2nd full paragraph, revise the 2nd and 3rd sentences as follows:

The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also planned.~~ ~~Both~~ The loading zone~~s~~ would likely have a minimal impact on the surrounding street network as ~~they~~ it would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes.

3. Appendix B, page 9, 2.10 Loading Areas, revise as follows:

When designing developments, it is important to consider a loading area that minimally impacts other travelers such as people driving or walking. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also planned.~~ ~~Both~~ The loading zone~~s~~ would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes.

4. Appendix B, page 11, Vision Zero consistency analysis, revise as follows:

When designing developments, it is important to consider a loading area that minimally impacts other travelers such as people driving or walking. The Project proposes a curbside passenger and shuttle loading zone along the northern frontage, immediately in front of the Venice Boulevard entrance. ~~A secondary passenger and shuttle loading zone directly north of the National Boulevard entrance is also planned.~~ ~~Both~~ The loading zone~~s~~ would provide a designated space for shuttles and passenger vehicles to wait in a "turnout" or indentation of the curb that provides sufficient space for vehicles to fully exit the vehicle and bicycle lanes.

5. Numerous pages (54 pages total) of the TIS include revised traffic data/numbers which have been updated to clarify credit that had been erroneously taken with regard to a furniture retail use on the Project Site that was inactive at the time traffic counts were conducted. In addition, a memorandum dated April 27, 2022 with regard to the reduction in intersections required to be analyzed as part of the Transportation Impact Study has been added to Appendix A of the TIS. None of these revisions or the added Memo include significant new information to the Draft EIR, result in a substantial new increase of the severity of any environmental impact, or change the impact conclusions in the Draft EIR. The revised TIS components of the TIS are listed below (and included in their entirety on the following pages).

   – Table 8 - Project Trip Generation Estimates Crossings Campus Project (1 page)

   – Figures 8, 9, 13 and 15 (1 page each)

   – Table 13 - Driveway Levels Of Service, Delay, and Queues Crossings Campus Project (1 page)

- Page 76
- Table 17 Transit Capacity and Demand Crossings Campus Project (1 page)
- April 27, 2022 Memo (4 pages)
- Appendix E - Existing Plus Project – Driveway Analysis (5 pages with cover page)
- Appendix E - Future Plus Project – Driveway Analysis (5 pages with cover page)
- Appendix E - Horizon Year Plus Project – Driveway Analysis (5 pages with cover page)
- Appendix F – Figures 1-4
- Appendix F – Table F7 - Driveway Level of Service, Delay, and Queues - Project Alternative Crossings Campus Project
- Appendix F - Existing Plus Project – Driveway Analysis Project Alternative (7 pages with cover page)
- Appendix F - Future Plus Project – Driveway Analysis Project Alternative (7 pages with cover page)
- Appendix F - Horizon Year Plus Project – Driveway Analysis Project Alternative (7 pages with cover page)

TABLE 8
PROJECT TRIP GENERATION ESTIMATES
CROSSINGS CAMPUS PROJECT

Land Use	ITE Land Use Code	Size	Trip Generation Rates						Trip Generation					
			AM Peak Hour			PM Peak Hour			AM Peak Hour Trips			PM Peak Hour		
			Rate [a]	In%	Out%	Rate [a]	In%	Out%	In	Out	Total	In	Out	Total
PROPOSED PROJECT														
Office	710 [b]	536.0 ksf	0.84	87%	13%	0.87	16%	84%	392	58	450	75	391	466
Culver City portion		*167.0 ksf*	*0.84*	*87%*	*13%*	*0.87*	*16%*	*84%*	*122*	*18*	*140*	*23*	*122*	*145*
Los Angeles portion		*369.0 ksf*	*0.84*	*87%*	*13%*	*0.87*	*16%*	*84%*	*270*	*40*	*310*	*51*	*270*	*321*
TOTAL DRIVEWAY TRIPS									392	58	450	75	391	466
EXISTING USE ADJUSTMENT [c]														
Office	710 [b]	51.5 ksf	0.84	87%	13%	0.87	16%	84%	37	6	43	7	38	45
Furniture Stores	~~890~~	~~24.6 ksf~~	~~0.26~~	~~71%~~	~~29%~~	~~0.52~~	~~47%~~	~~53%~~	~~4~~	~~2~~	~~6~~	~~6~~	~~7~~	~~13~~
Less: Walk/Bike/Transit Adjustment [d]			~~*25%*~~			~~*25%*~~			~~(1)~~	~~(1)~~	~~(2)~~	~~(2)~~	~~(2)~~	~~(4)~~
Net External Vehicle Trips									~~3~~	~~1~~	~~4~~	~~4~~	~~5~~	~~9~~
									37	6	43	7	38	45
TOTAL EXISTING TRIPS									~~40~~	~~7~~	~~47~~	~~11~~	~~43~~	~~54~~
NET INCREMENTAL EXTERNAL TRIPS									~~**352**~~	~~**51**~~	~~**403**~~	~~**64**~~	~~**348**~~	~~**412**~~
									355	**52**	**407**	**68**	**353**	**421**

Notes:

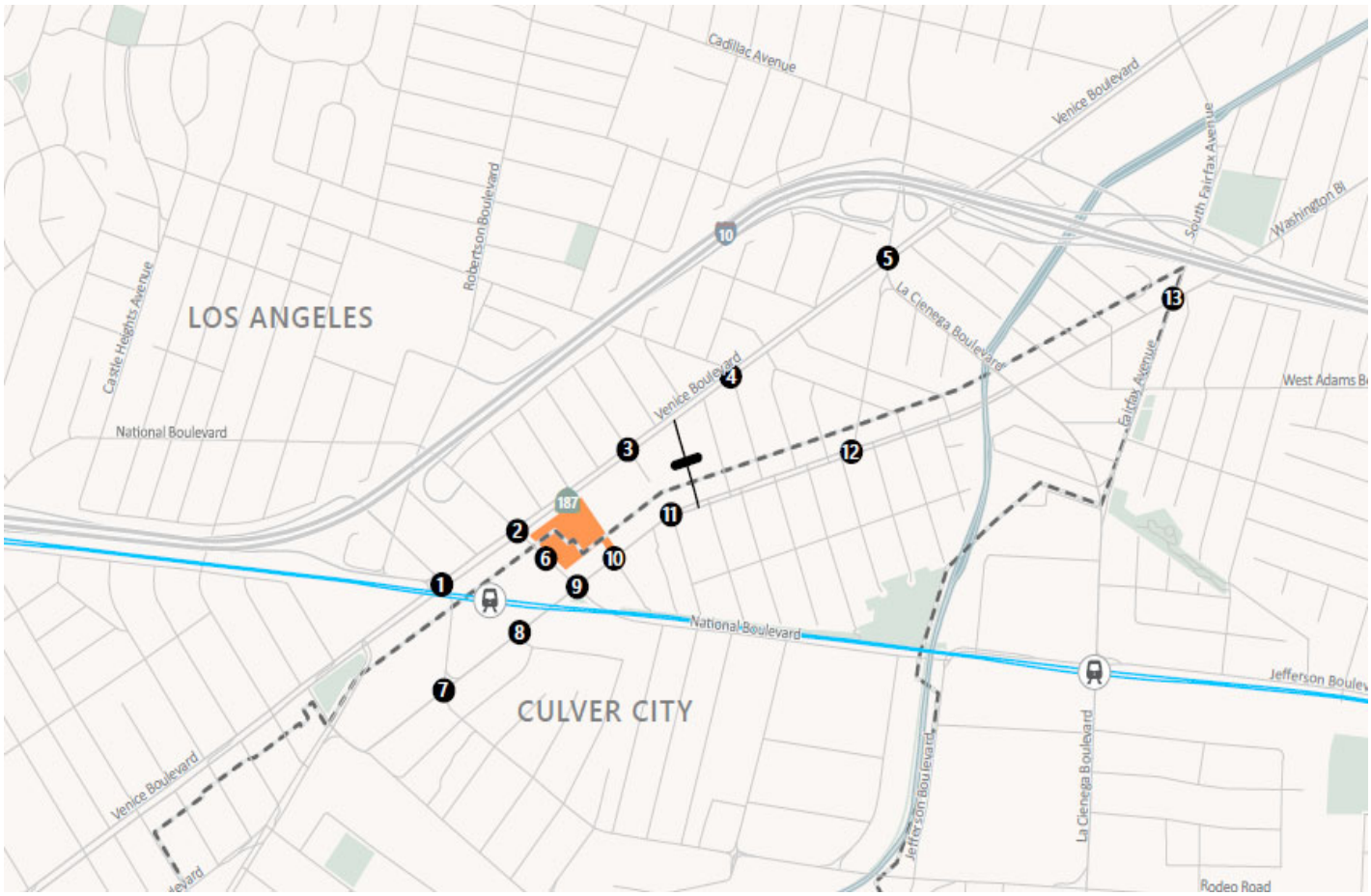
[a] Source: Institute of Transportation Engineers (ITE), *Trip Generation, 11th Edition*, 2021.

[b] These rates reflect the "Dense Multi-Use Urban" variant of the General Office Building typology.

These rates account for transit-related vehicle trip reduction, so no further adjustment was made.

[c] Existing land uses information provided by the applicant of the project.

[d] Per the Culver City Transportation Guidelines, a maximum of 25% trip credit can be taken for land uses within 1/4 mile of a rail transit station. The Project site is less than 1/4 mile from the Metro E Line Culver City Station. The rates used for ITE 890 Furniture Stores reflect the "General Urban/Suburban" variant. Therefore, a 25% transit adjustment was taken for this existing land use.



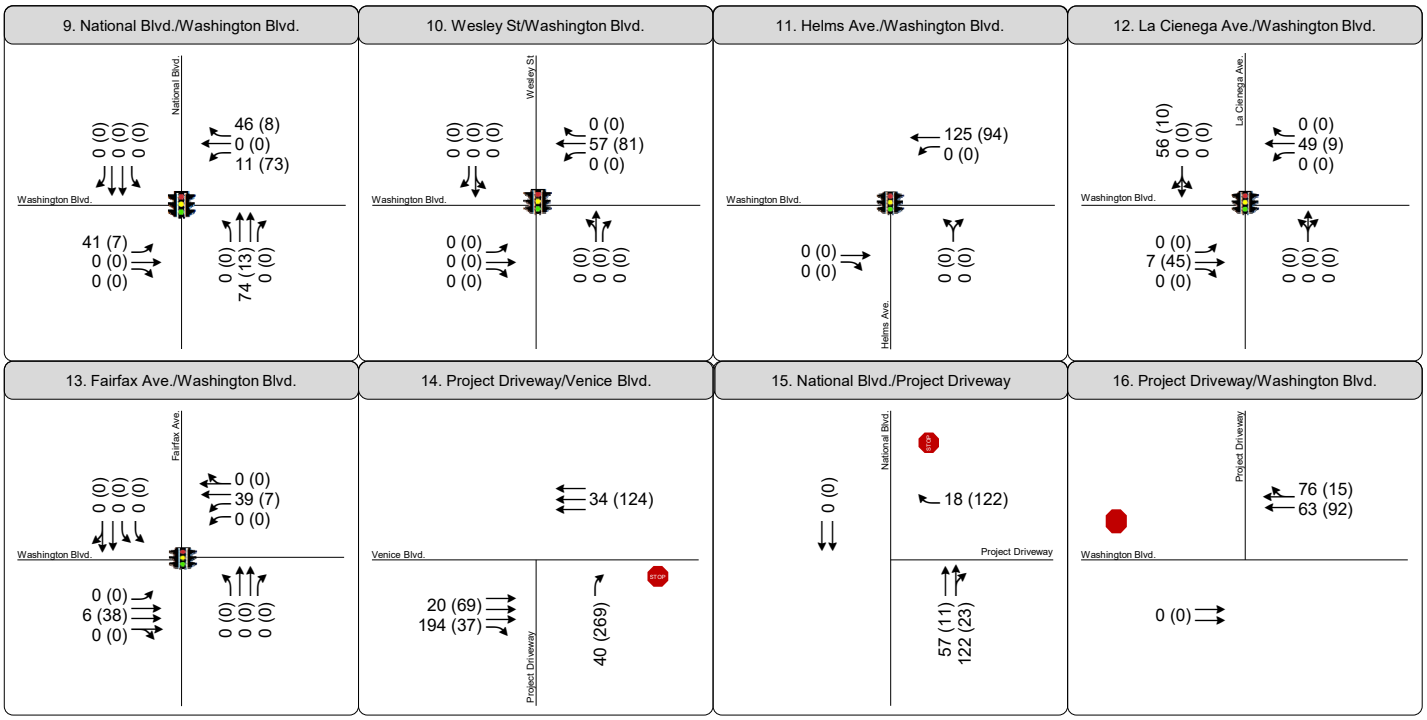


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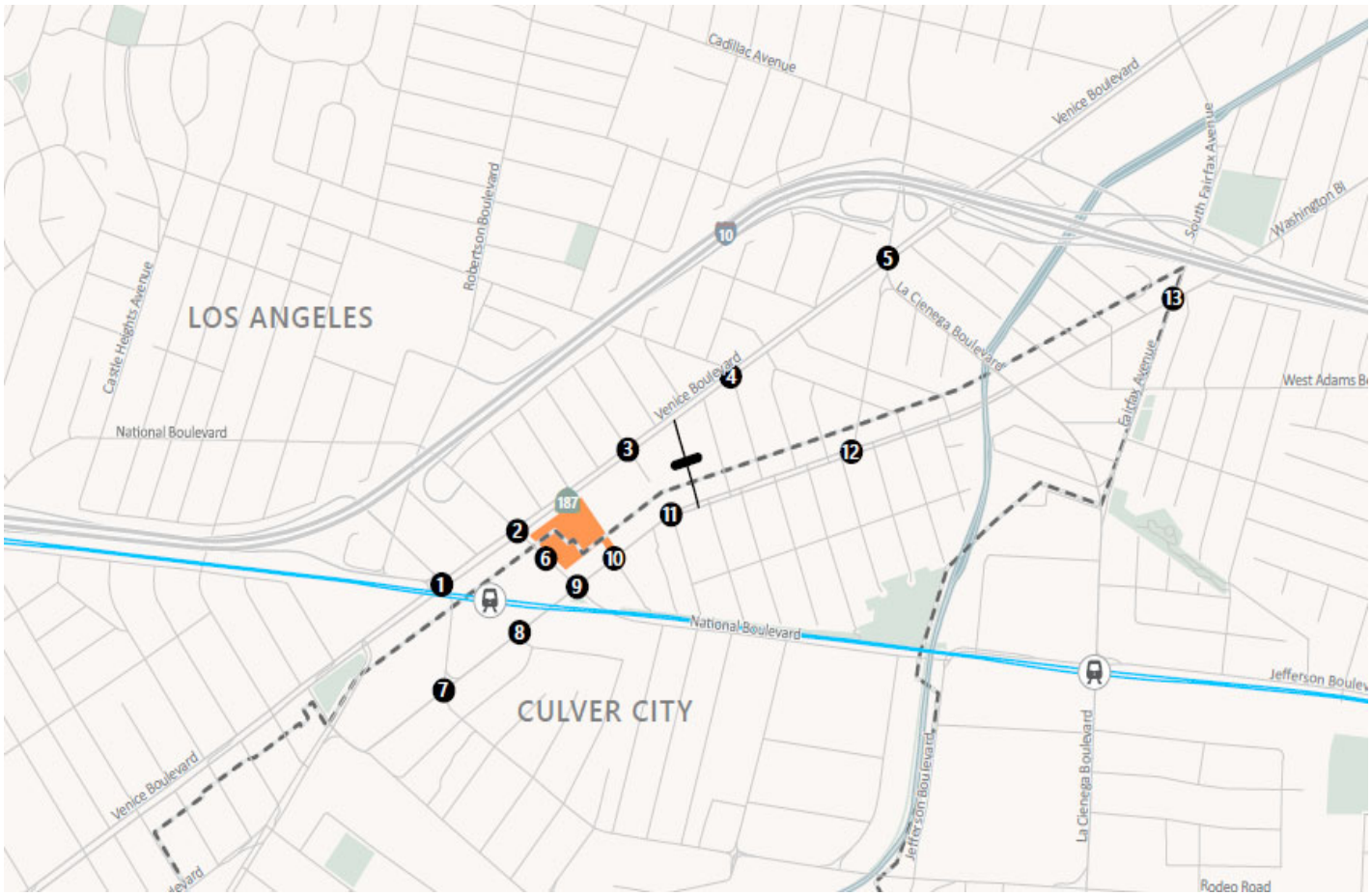
Figure 8

Peak Hour Traffic Volumes and Lane Configurations
Project Only
Crossings Campus Project



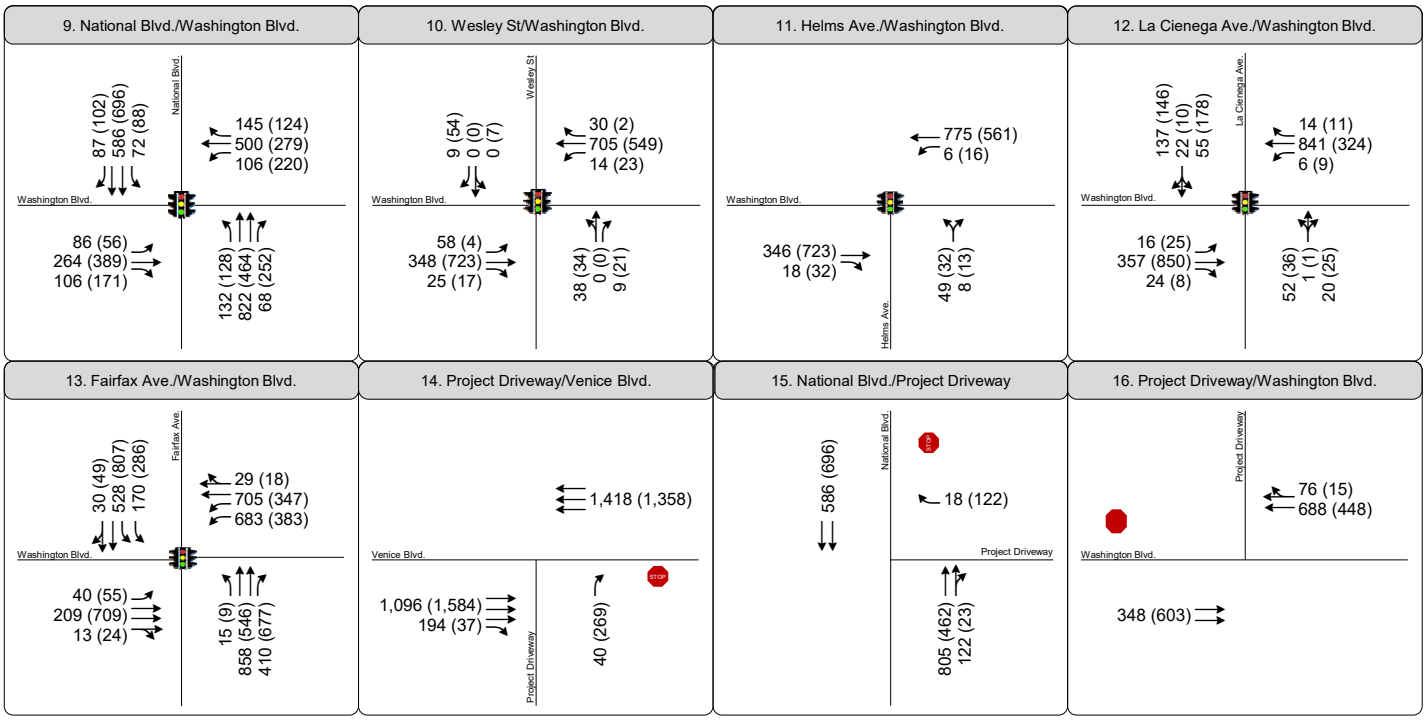


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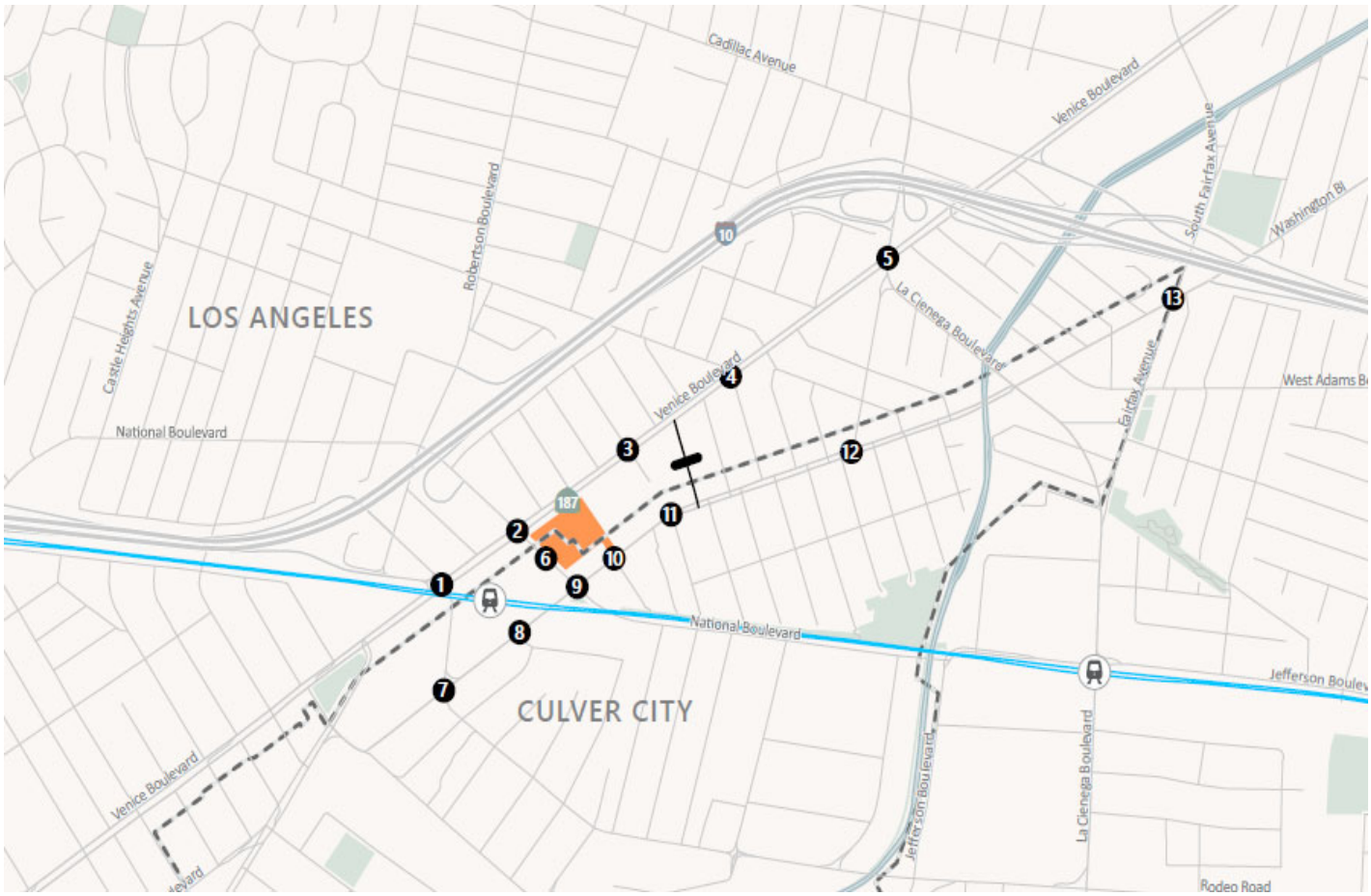
Figure 9

Peak Hour Traffic Volumes and Lane Configurations
Existing + Project Conditions
Crossings Campus Project



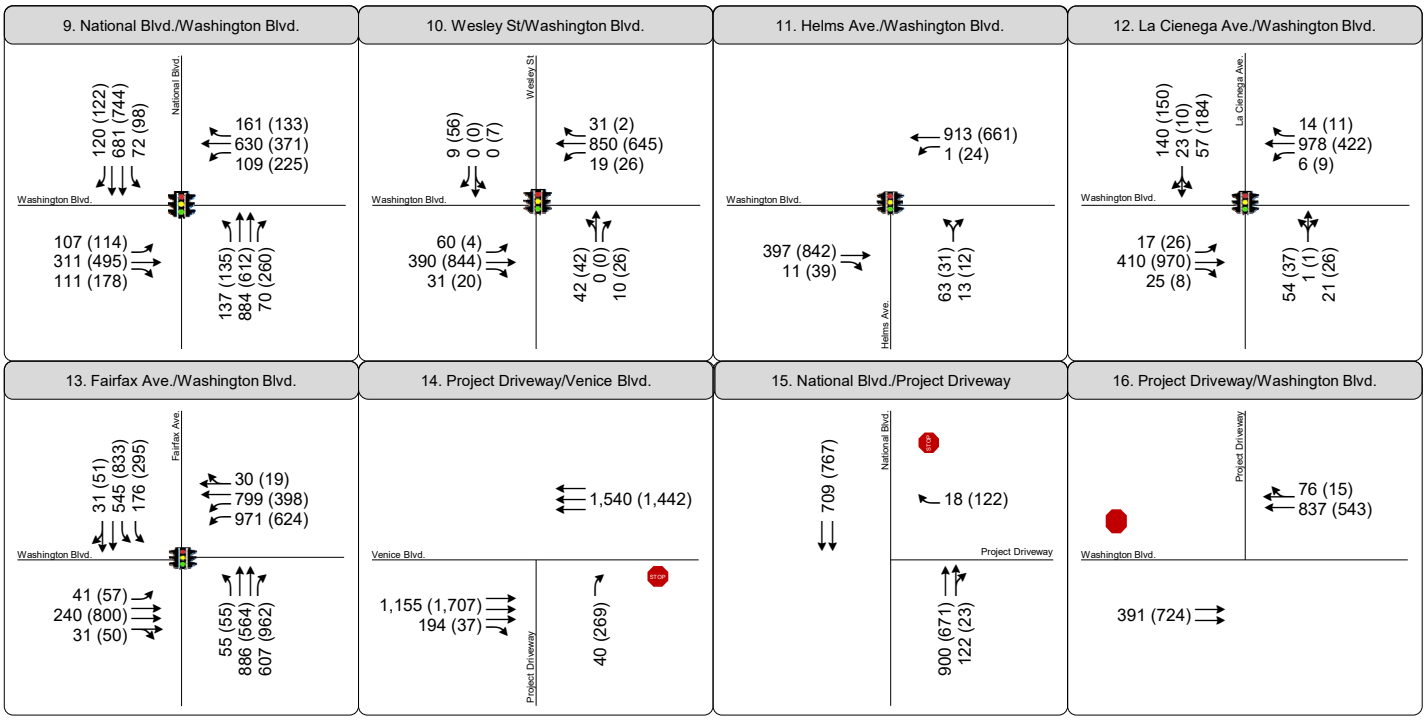
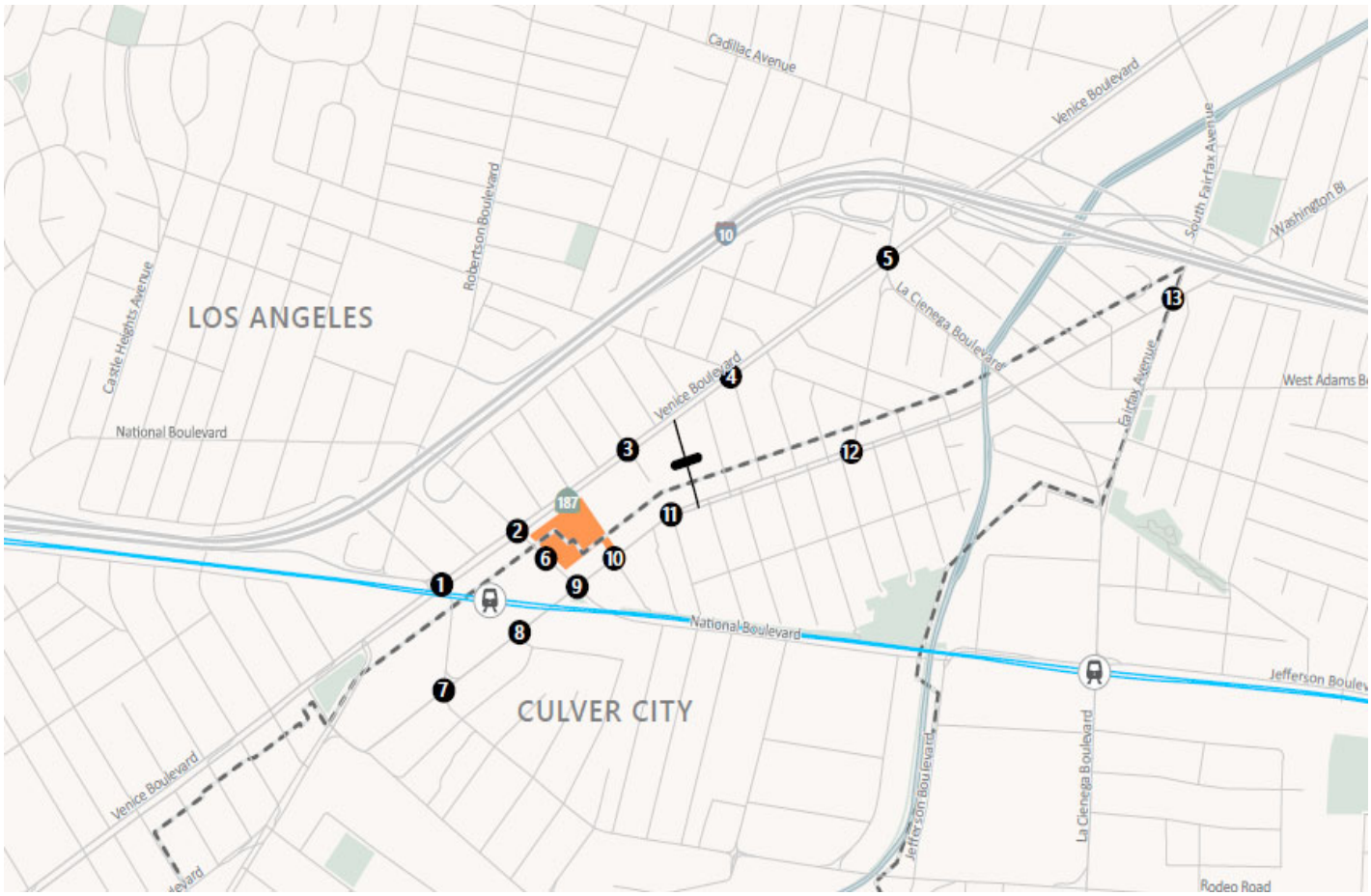


Figure 13

Peak Hour Traffic Volumes and Lane Configurations
Future + Project Conditions
Crossings Campus Project



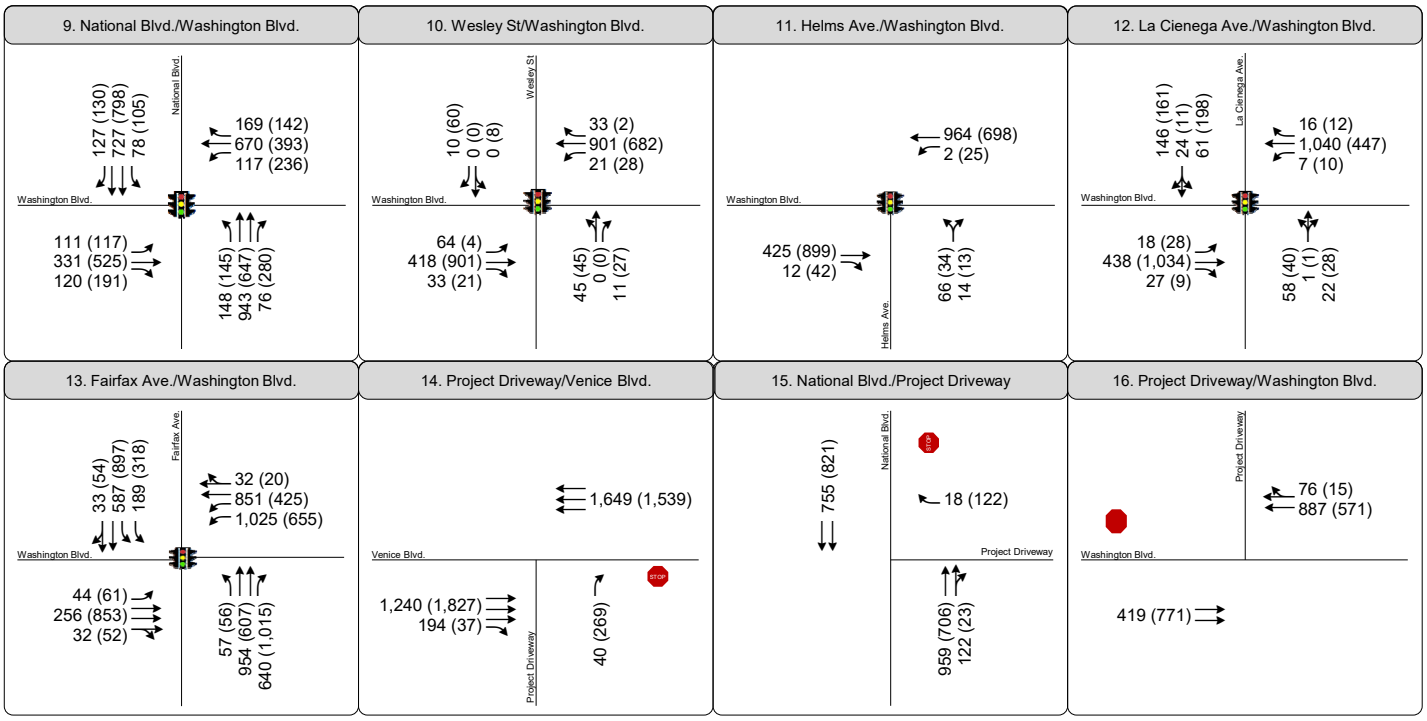


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Figure 15

Peak Hour Traffic Volumes and Lane Configurations
Horizon Year + Project Conditions
Crossings Campus Project

TABLE 13
DRIVEWAY LEVELS OF SERVICE, DELAY, AND QUEUES
CROSSINGS CAMPUS PROJECT

DRIVEWAY	PEAK HOUR	EXISTING + PROJECT			FUTURE + PROJECT			HORIZON YEAR + PROJECT		
		DELAY	LOS	QUEUE (feet) [a]	DELAY	LOS	QUEUE (feet) [a]	DELAY	LOS	QUEUE (feet) [a]
Venice Driveway & Venice Boulevard	AM	~~16~~ 15	C	N/A	16	C	N/A	17	C	N/A
	PM	~~140~~ 101	F	N/A	~~190~~ 140	F	N/A	~~247~~ 186	F	N/A
National Boulevard & National Driveway	AM	12	B	N/A	13	B	N/A	13	B	N/A
	PM	11	B	N/A	12	B	N/A	~~13~~ 12	B	N/A

[a] Intersection movement 95th percentile queues rounded to the nearest 25 feet, approximately the length of one vehicle.

This page replaces the prior version in its entirety.

Transit Operations Analysis

Per the Culver City TSCG, the purpose of the transit operations analysis is to determine what effects the proposed Project may have on public transit demand, capacity, delay, and conditions. The Project is expected to generate more than 300 new vehicle trips in the PM peak hour. Therefore, per the TSCG, a transit delay analysis is required.

Transit Demand and Capacity

Vehicle trip generation rates used in this study assume that 25% of Project trips would utilize public transit. It is estimated that the Project would result in 150 new transit trips in the AM peak hour, and 155 new transit trips in the PM peak hour. **Figure 3**, introduced in Chapter 2, shows data for transit services near the Project Site. This transit demand and capacity analysis considers only those services that have bus stops or rail stations within a quarter mile (a reasonable walk for most people to access transit service) of the Site. These include Big Blue Bus Line 17; Culver City Bus Lines 1, 1C, and 7; LADOT Commuter Express Line 437A; Metro Bus Lines 33 and 617; and Metro E Line. Based on transit headways before the COVID-19 pandemic, up to 19 buses per hour would service bus stops within a quarter mile of the Project Site during both the AM and PM peak periods. Assuming a capacity of 83 total (seated and standing) passengers per 40' long bus and a capacity of 49 passengers per 40' Commuter Express coach bus, the bus transit capacity that would serve the Project Site would be 15,859 passengers per hour during peak periods. Assuming a 405-passenger capacity on a three-car train and eight trains per hour during peak hours, the Metro Rail E Line capacity servicing the nearby Culver City station would be 3,240 passengers during both the AM and PM peak periods.

Using the trip direction proportions from the trip distribution discussed earlier in **Figure 7**, estimated Project transit trips can be allocated to those transit services with stops or stations within a quarter mile of the Project. **Table 17** displays headways, capacity, ridership data, and estimated Project transit trips that would utilize each of the services. The Project transit trips are a conservative estimate that assumes all riders traveling on a particular transit line direction would board the same vehicle at the same time. Even with those assumptions, most transit lines would add fewer than 20 riders in each peak hour and no transit line would see boardings representing more than ~~30%~~ 32% of peak hour transit vehicle capacity.

TABLE 17
TRANSIT CAPACITY AND DEMAND
CROSSINGS CAMPUS PROJECT

Line	Weekday Frequency (min.)			Peak Hour Transit Vehicles per Hour	Seated Vehicle Capacity	Peak Hour Seated Capacity	Pre-Pandemic Weekday Line Ridership	AM Project Trips	PM Project Trips	AM % of Capacity	PM % of Capacity
	Peak	Mid-Day	Evening								
Big Blue Bus											
17	20	20	20-60	3	83	249	1,600	~~11~~ 10	~~11~~ 10	4%	4%
Culver City Bus											
1	15	15	30	2	83	166	3,083	~~15~~ 14	~~17~~ 15	~~9%~~ 8%	~~10%~~ 9%
1C	10	15	15	4	83	332		~~15~~ 14	~~17~~ 15	~~5%~~ 4%	5%
7	40	40-45	-	1	83	83	390	~~15~~ 14	~~17~~ 15	~~18%~~ 17%	~~20%~~ 19%
LADOT Commuter Express											
437	15-30	-	-	4	49	196	83	~~12~~ 11	~~11~~ 10	~~6%~~ 5%	~~6%~~ 5%
Metro Bus											
33	7.5	7.5	15-30	4	83	332	10,085	~~15~~ 14	~~17~~ 15	~~5%~~ 4%	5%
617	45	45	60	1	83	83	618	~~26~~ 24	~~27~~ 25	~~32%~~ 29%	~~33%~~ 30%
Metro Rail											
E Line	8	12	8	8	405	3240	61,590	~~22~~ 20	~~23~~ 21	1%	1%

Notes:
Rail Capacity: 135 passengers/car, can be up to 3 cars long during peak hour.
LADOT bus capacity: https://www.masstransitmag.com/home/press-release/10277295/motor-coach-industries-mci-ladot-orders-84-mci-commuter-coaches-powered-by-cng

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FEHR PEERS

Memorandum

Date: April 27, 2022

To: City of Culver City

From: Jeremiah LaRose and Vivian Lee, *Fehr & Peers*

Subject: Request for Modification to the Methodologies and Assumptions for Crossings Campus Transportation Impact Analysis

LA21-3287

This memorandum documents the request for modifications to the methodologies and assumptions outlined in the Memorandum of Understanding (MOU) dated February 3, 2022 for the Transportation Study to be prepared as part of the environmental impact report (EIR) for Crossings Campus. These requests arose out of discussions with the City of Culver City and the applicant.

Supplemental Transportation Analysis

This section describes the request for modifications to the approach for the non-CEQA transportation traffic operations analysis for the City of Culver City.

Traffic Operations

Study Intersections

The number of study intersections analyzed would be reduced from 22 to 13 under both driveway alternatives. **Figure 1** shows the intersections that are being requested to be removed from the analysis and **Figure 2** shows the final set of study intersections, listed as follows:

1. Robertson Boulevard & Venice Boulevard
2. National Boulevard & Venice Boulevard
3. Helms Avenue & Venice Boulevard
4. Cattaraugus Avenue & Venice Boulevard
5. La Cienega Boulevard & Venice Boulevard
6. Ivy Station & National Boulevard
7. Robertson Boulevard & Washington Boulevard
8. Landmark Street & Washington Boulevard
9. National Boulevard & Washington Boulevard

10. Wesley Street & Washington Boulevard
11. Helms Avenue & Washington Boulevard
12. La Cienega Avenue & Washington Boulevard
13. Fairfax Avenue & Washington Boulevard

Data Collection

Based on the final set of 13 study intersections, new traffic counts should be collected in May 2022 as stay-at-home orders during the COVID-19 pandemic are lifted and most businesses are returning to working in person. Notably, counts would be taken after Amazon Studios, a large employer in the study area, expects to return to in-person work. These new counts would serve as the basis for the Existing Year analysis. Buildout and Future Year forecasts would also be developed using these counts following the methodology agreed to in the MOU.

CEQA Freeway Analysis Only

Intersections to be Removed

Study Intersections

Study Roadway Segments

Metro Rail Stations

Metro E Line

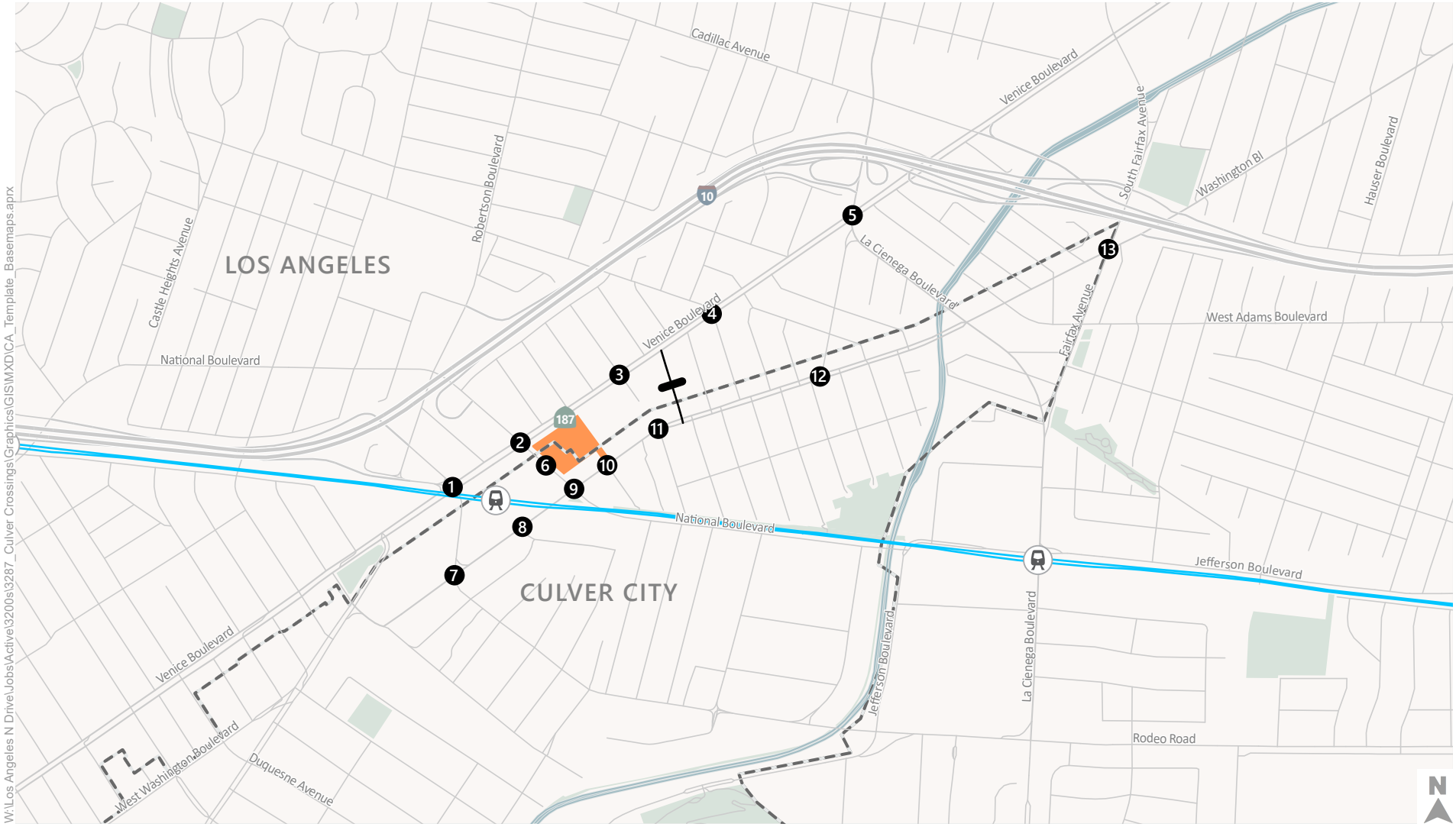
Cities

Parks

Project Site

Figure 1

Study Intersection Update



Study Intersections
Study Roadway Segments
Metro Rail Stations
Metro E Line
Cities
Parks
Project Site

Figure 2

Study Intersections

EXISTING PLUS PROJECT – DRIVEWAY ANALYSIS

Intersection	
Int Delay, s/veh	0.2

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1096	194	0	1418	0	40
Future Vol, veh/h	1096	194	0	1418	0	40
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1191	211	0	1541	0	43

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	596
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	383
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	383
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	15.6
HCM LOS			C

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	383	-	-	-
HCM Lane V/C Ratio	0.114	-	-	-
HCM Control Delay (s)	15.6	-	-	-
HCM Lane LOS	C	-	-	-
HCM 95th %tile Q(veh)	0.4	-	-	-

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Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	805	122	0	586
Future Vol, veh/h	0	18	805	122	0	586
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	875	133	0	637

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	504	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	513	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	513	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.3	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	513	-
HCM Lane V/C Ratio	-	-	0.038	-
HCM Control Delay (s)	-	-	12.3	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-

Intersection	
Int Delay, s/veh	11.6

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1584	37	0	1358	0	269
Future Vol, veh/h	1584	37	0	1358	0	269
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1722	40	0	1476	0	292

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	861
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	~ 257
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	~ 257
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	140.2
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	257	-	-	-
HCM Lane V/C Ratio	1.138	-	-	-
HCM Control Delay (s)	140.2	-	-	-
HCM Lane LOS	F	-	-	-
HCM 95th %tile Q(veh)	12.9	-	-	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

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Intersection	
Int Delay, s/veh	1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	462	23	0	696
Future Vol, veh/h	0	122	462	23	0	696
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	502	25	0	757

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	264	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	734	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	734	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	11	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	734	-
HCM Lane V/C Ratio	-	-	0.181	-
HCM Control Delay (s)	-	-	11	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.7	-

FUTURE PLUS PROJECT – DRIVEWAY ANALYSIS

Intersection	
Int Delay, s/veh	0.2

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1155	194	0	1540	0	40
Future Vol, veh/h	1155	194	0	1540	0	40
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1255	211	0	1674	0	43

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	628
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	365
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	365
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	16.2
HCM LOS			C

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	365	-	-	-
HCM Lane V/C Ratio	0.119	-	-	-
HCM Control Delay (s)	16.2	-	-	-
HCM Lane LOS	C	-	-	-
HCM 95th %tile Q(veh)	0.4	-	-	-

Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	900	122	0	709
Future Vol, veh/h	0	18	900	122	0	709
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	978	133	0	771

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	556	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	475	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	475	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.9	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	475	-
HCM Lane V/C Ratio	-	-	0.041	-
HCM Control Delay (s)	-	-	12.9	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-

Intersection	
Int Delay, s/veh	14.8

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1707	37	0	1442	0	269
Future Vol, veh/h	1707	37	0	1442	0	269
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1855	40	0	1567	0	292

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	928
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	~ 232
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	~ 232
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	189.7
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	232	-	-	-
HCM Lane V/C Ratio	1.26	-	-	-
HCM Control Delay (s)	189.7	-	-	-
HCM Lane LOS	F	-	-	-
HCM 95th %tile Q(veh)	14.9	-	-	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

This page replaces the prior version in its entirety.

Intersection	
Int Delay, s/veh	1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	671	23	0	767
Future Vol, veh/h	0	122	671	23	0	767
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	729	25	0	834

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	377	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	621	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	621	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.4	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	621	-
HCM Lane V/C Ratio	-	-	0.214	-
HCM Control Delay (s)	-	-	12.4	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.8	-

HORIZON YEAR PLUS PROJECT – DRIVEWAY ANALYSIS

Intersection	
Int Delay, s/veh	0.2

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1240	194	0	1649	0	40
Future Vol, veh/h	1240	194	0	1649	0	40
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1348	211	0	1792	0	43

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	674
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	341
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	341
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	17.1
HCM LOS			C

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	341	-	-	-
HCM Lane V/C Ratio	0.128	-	-	-
HCM Control Delay (s)	17.1	-	-	-
HCM Lane LOS	C	-	-	-
HCM 95th %tile Q(veh)	0.4	-	-	-

Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	959	122	0	755
Future Vol, veh/h	0	18	959	122	0	755
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	1042	133	0	821

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	588	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	452	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	452	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	13.3	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	452	-
HCM Lane V/C Ratio	-	-	0.043	-
HCM Control Delay (s)	-	-	13.3	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-

Intersection	
Int Delay, s/veh	18.1

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑↑	↱		↑↑↑		↱
Traffic Vol, veh/h	1827	37	0	1539	0	269
Future Vol, veh/h	1827	37	0	1539	0	269
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	85	-	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1986	40	0	1673	0	292

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	-	-	-	993
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	-	-	-	7.14
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	-	-	-	3.92
Pot Cap-1 Maneuver	-	-	0	-	0	~ 210
Stage 1	-	-	0	-	0	-
Stage 2	-	-	0	-	0	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	-	-	-	~ 210
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s	0	0	246.6
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBT
Capacity (veh/h)	210	-	-	-
HCM Lane V/C Ratio	1.392	-	-	-
HCM Control Delay (s)	246.6	-	-	-
HCM Lane LOS	F	-	-	-
HCM 95th %tile Q(veh)	16.8	-	-	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	0.9

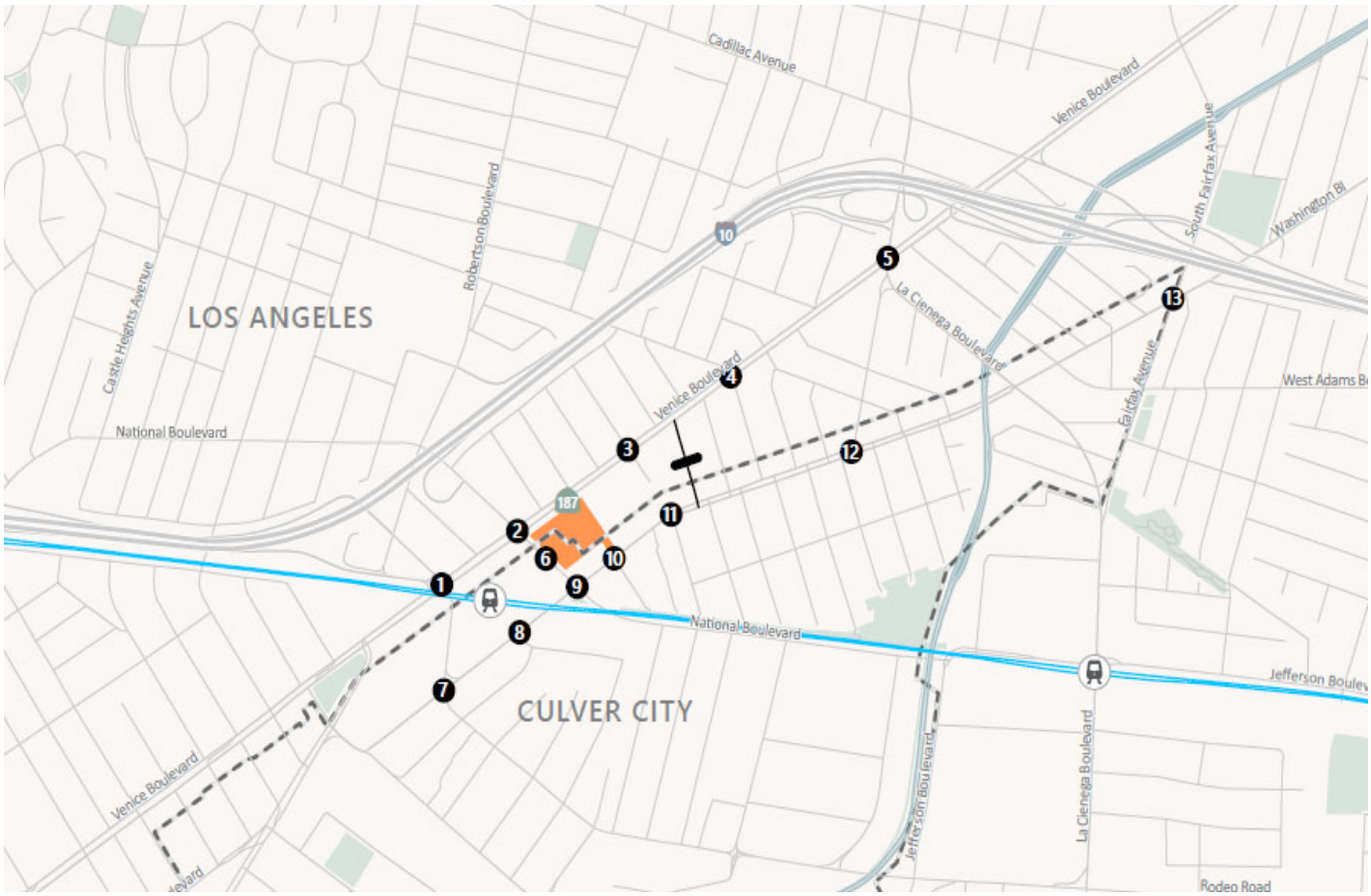
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	706	23	0	821
Future Vol, veh/h	0	122	706	23	0	821
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	767	25	0	892

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	396	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	603	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	603	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.6	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	603	-
HCM Lane V/C Ratio	-	-	0.22	-
HCM Control Delay (s)	-	-	12.6	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.8	-

Appendix F: Alternative Access Supplemental Analysis



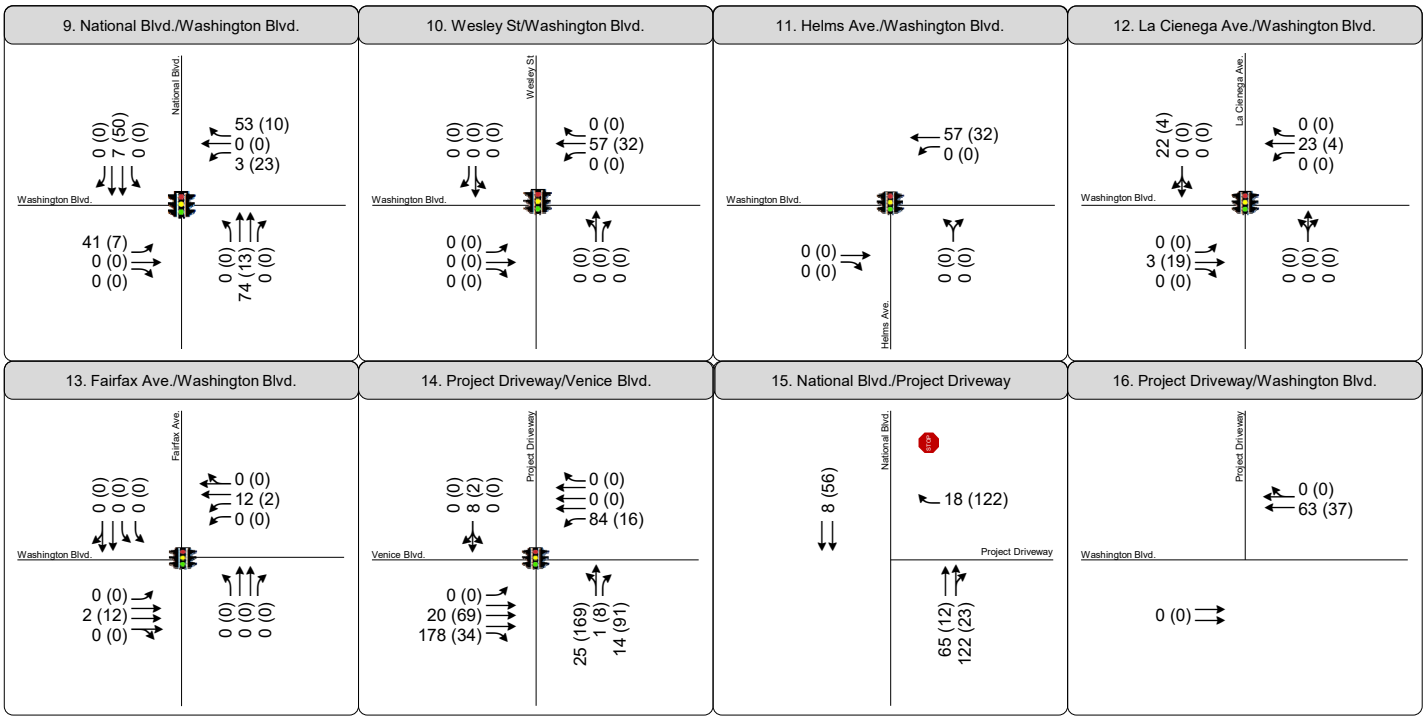


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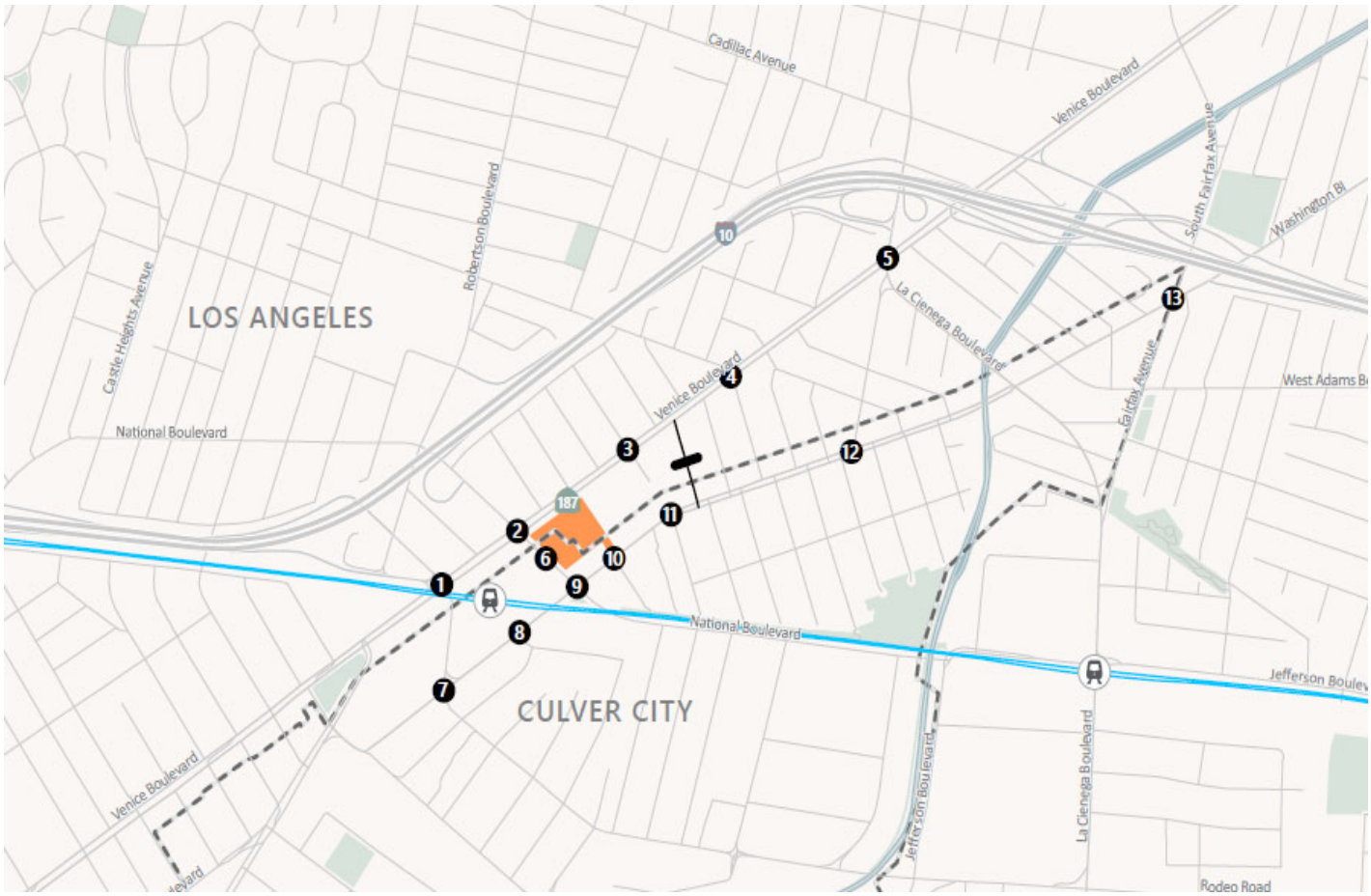
Figure F1

Peak Hour Traffic Volumes and Lane Configurations
Project Only - Project Alternative
Crossings Campus Project



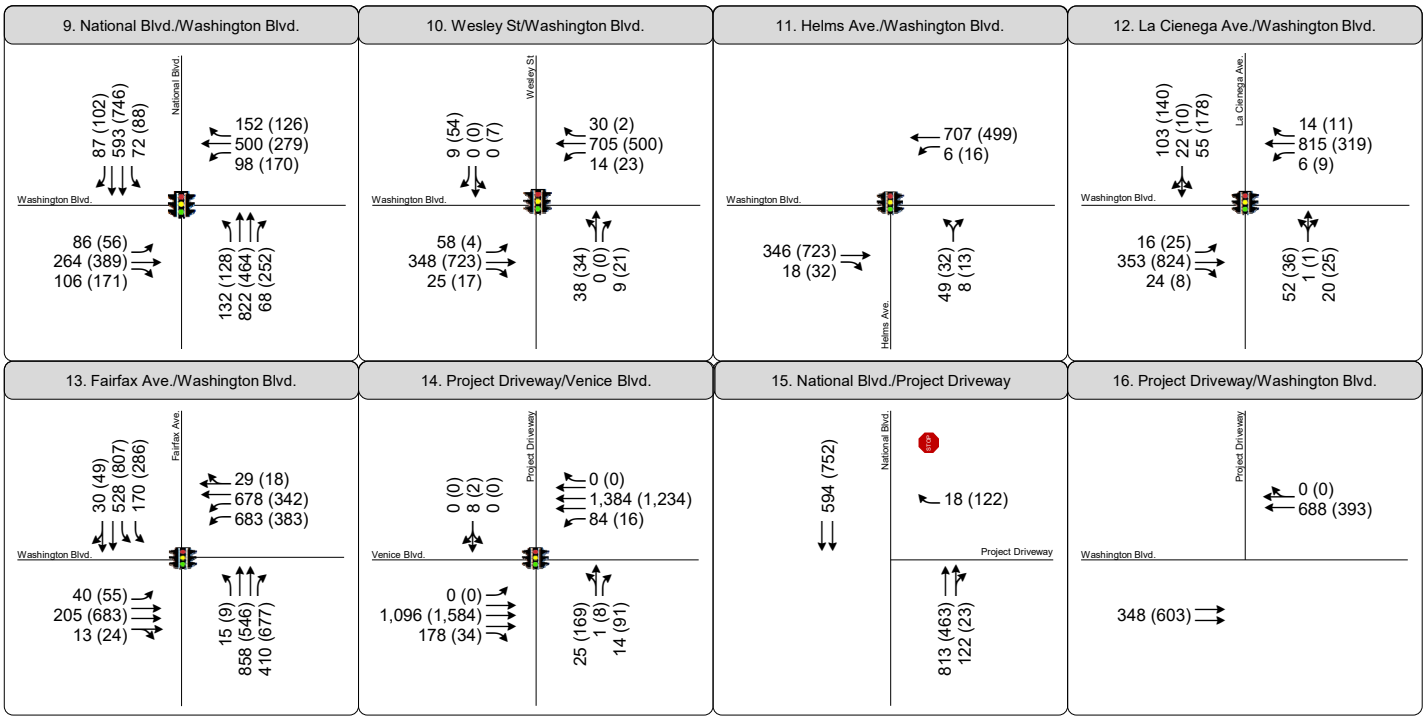


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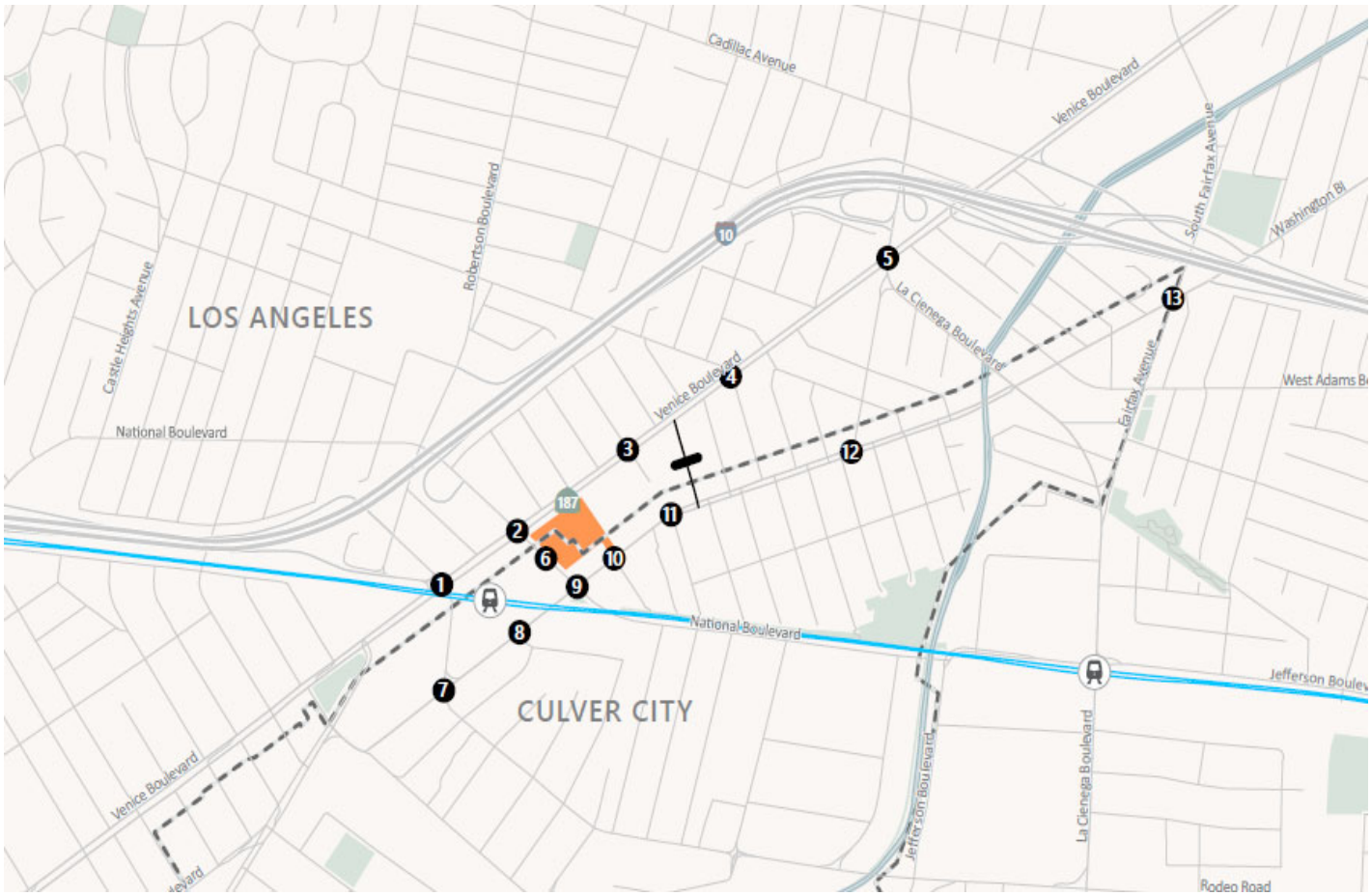
Figure F2

Peak Hour Traffic Volumes and Lane Configurations
Existing + Project Conditions - Project Alternative
Crossings Campus Project



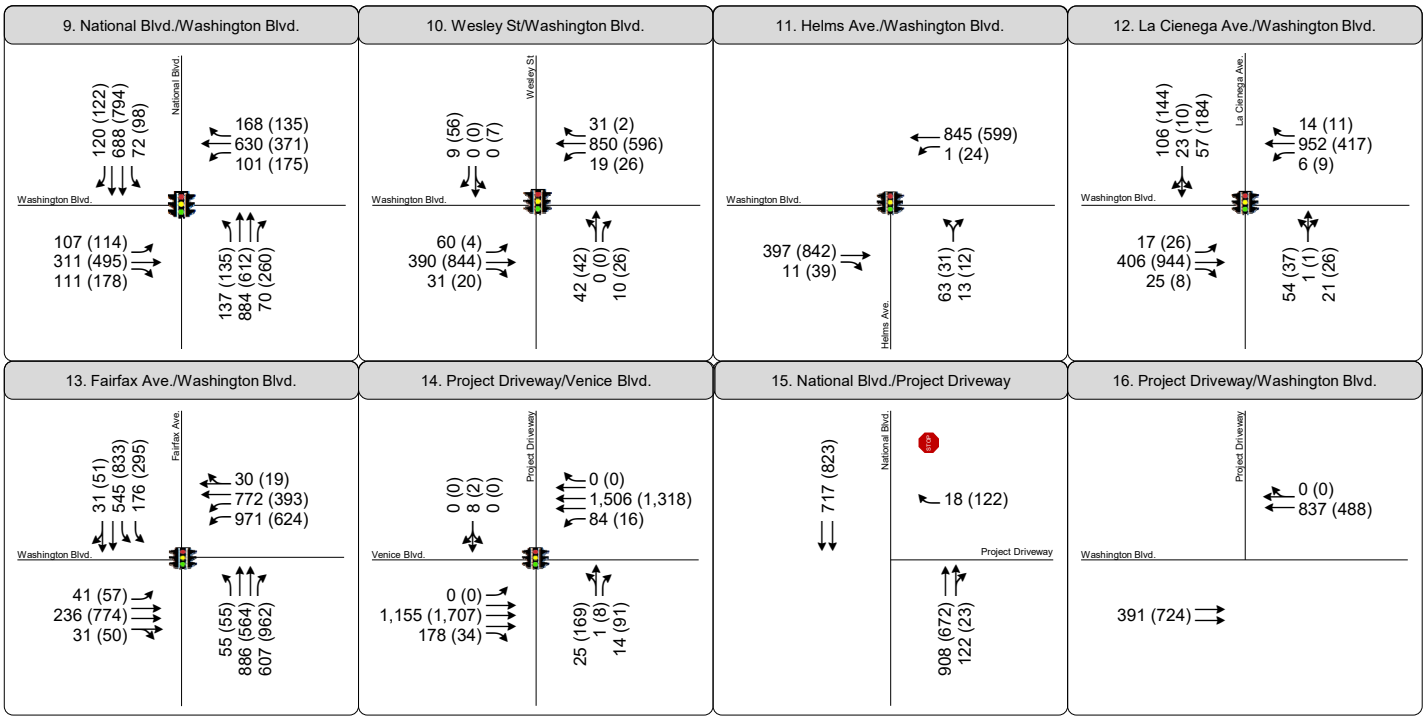


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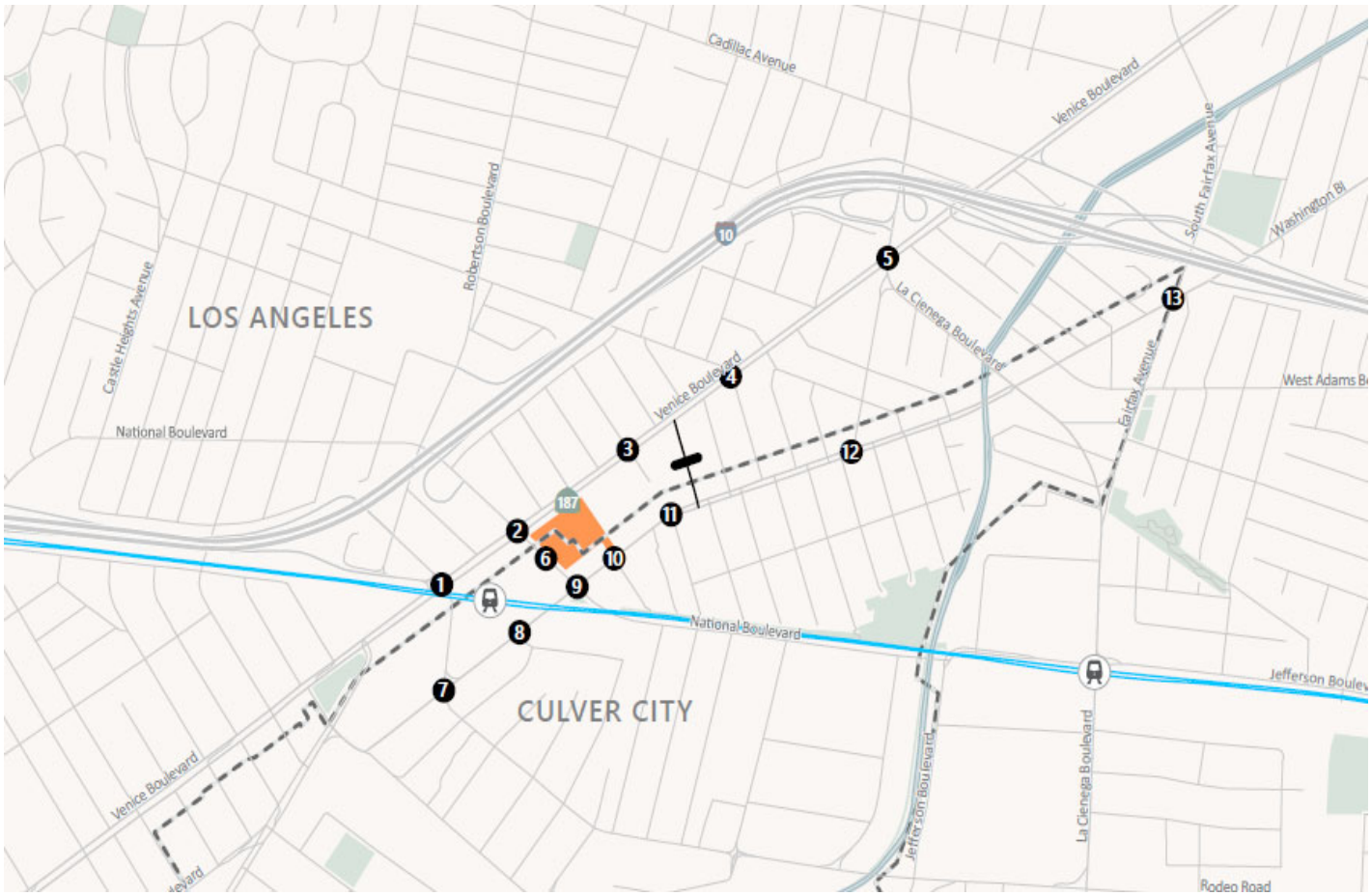
Figure F3

Peak Hour Traffic Volumes and Lane Configurations
Future + Project Conditions - Project Alternative
Crossings Campus Project



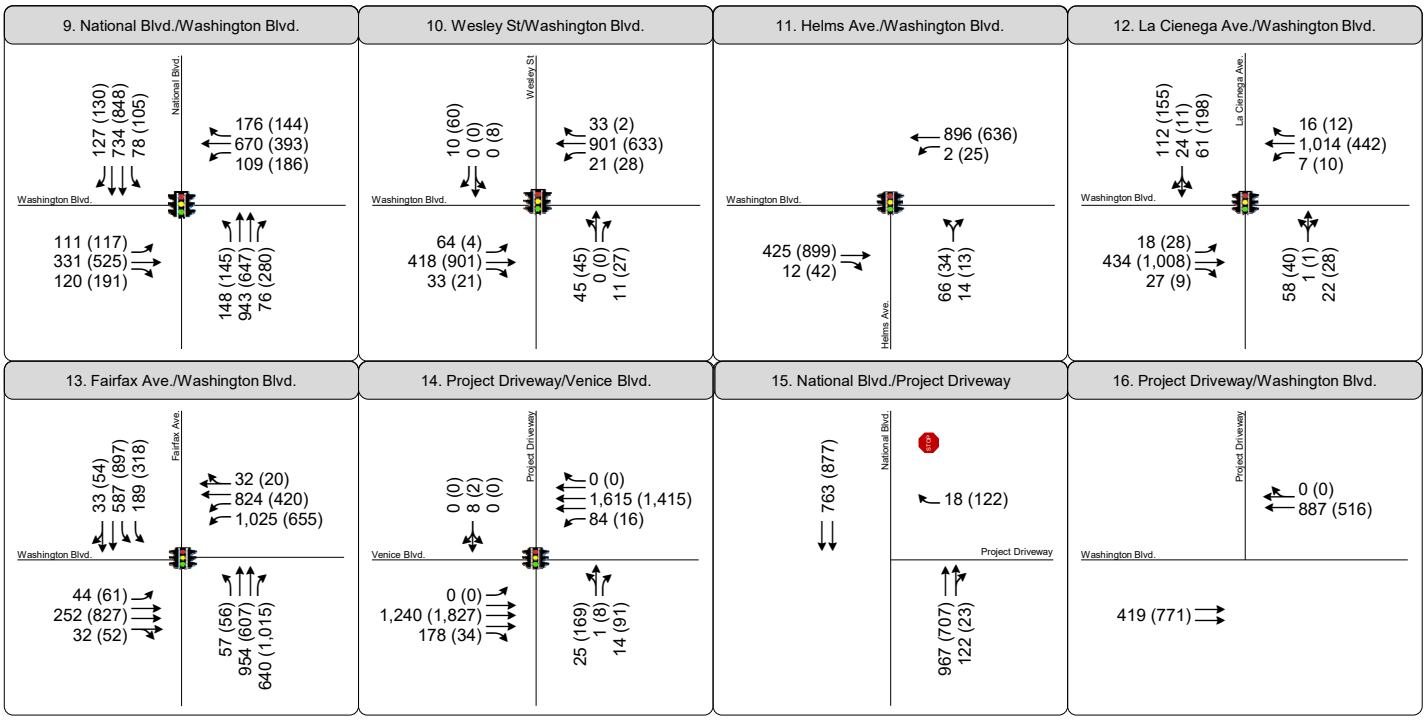


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Figure F4

Peak Hour Traffic Volumes and Lane Configurations
Horizon Year + Project Conditions - Project Alternative
Crossings Campus Project

This page replaces the prior version in its entirety.

TABLE F7
DRIVEWAY LEVEL OF SERVICE, DELAY, AND QUEUES - PROJECT ALTERNATIVE
CROSSINGS CAMPUS PROJECT

DRIVEWAY	PEAK HOUR	EXISTING + PROJECT			FUTURE + PROJECT			HORIZON YEAR + PROJECT		
		DELAY	LOS	QUEUE (feet) [a]	DELAY	LOS	QUEUE (feet) [a]	DELAY	LOS	QUEUE (feet) [a]
Venice Driveway & Venice Boulevard [b]	AM	4	A	40	5	A	~~54~~ 48	5	A	~~50~~ 45
	PM	~~13~~ 11	B	~~20~~ 17	~~14~~ 12	B	~~19~~ 16	~~15~~ 12	B	~~17~~ 14
National Boulevard & National Driveway	AM	12	B	N/A	13	B	N/A	13	B	N/A
	PM	11	B	N/A	12	B	N/A	~~13~~ 12	B	N/A

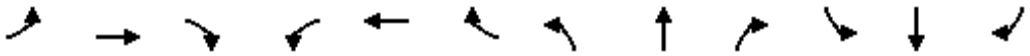
[a] Intersection movement 95th percentile queues rounded to the nearest 25 feet, approximately the length of one vehicle.

[b] Intersection is currently unsignalized, but is proposed to be signalized as part of Project construction.

EXISTING PLUS PROJECT – DRIVEWAY ANALYSIS
PROJECT ALTERNATIVE

HCM Signalized Intersection Capacity Analysis
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1096	178	84	1384	0	25	1	14	0	8	0
Future Volume (vph)	0	1096	178	84	1384	0	25	1	14	0	8	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1664			1801	
Flt Permitted		1.00	1.00	0.19	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	340	4916			1664			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1191	193	91	1504	0	27	1	15	0	9	0
RTOR Reduction (vph)	0	0	43	0	0	0	0	14	0	0	0	0
Lane Group Flow (vph)	0	1191	150	91	1504	0	0	29	0	0	9	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		78.5	78.5	93.3	93.3			8.1			2.0	
Effective Green, g (s)		78.5	78.5	93.3	93.3			8.1			2.0	
Actuated g/C Ratio		0.65	0.65	0.78	0.78			0.07			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		3215	1001	380	3822			112			30	
v/s Ratio Prot		0.24		0.02	c0.31			c0.02			c0.00	
v/s Ratio Perm			0.10	0.17								
v/c Ratio		0.37	0.15	0.24	0.39			0.26			0.30	
Uniform Delay, d1		9.5	8.0	4.1	4.3			53.1			58.3	
Progression Factor		0.23	0.04	0.85	1.23			1.00			1.00	
Incremental Delay, d2		0.3	0.3	0.3	0.3			1.2			5.6	
Delay (s)		2.4	0.6	3.8	5.5			54.3			63.9	
Level of Service		A	A	A	A			D			E	
Approach Delay (s)		2.2			5.4			54.3			63.9	
Approach LOS		A			A			D			E	

Intersection Summary			
HCM 2000 Control Delay	4.8	HCM 2000 Level of Service	A
HCM 2000 Volume to Capacity ratio	0.40		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	56.7%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

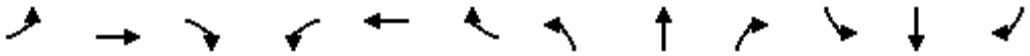
Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	813	122	0	594
Future Vol, veh/h	0	18	813	122	0	594
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	884	133	0	646

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	509	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	509	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	509	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.4	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	509	-
HCM Lane V/C Ratio	-	-	0.038	-
HCM Control Delay (s)	-	-	12.4	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1584	34	16	1234	0	169	8	91	0	2	0
Future Volume (vph)	0	1584	34	16	1234	0	169	8	91	0	2	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1666			1801	
Flt Permitted		1.00	1.00	0.08	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	141	4916			1666			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1722	37	17	1341	0	184	9	99	0	2	0
RTOR Reduction (vph)	0	0	16	0	0	0	0	17	0	0	0	0
Lane Group Flow (vph)	0	1722	21	17	1341	0	0	275	0	0	2	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Effective Green, g (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Actuated g/C Ratio		0.56	0.56	0.64	0.64			0.21			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		2777	865	142	3129			347			30	
v/s Ratio Prot		c0.35		0.00	c0.27			c0.17			c0.00	
v/s Ratio Perm			0.01	0.07								
v/c Ratio		0.62	0.02	0.12	0.43			0.79			0.07	
Uniform Delay, d1		17.5	11.5	11.6	10.9			45.1			58.1	
Progression Factor		0.33	1.00	0.83	0.98			1.00			1.00	
Incremental Delay, d2		0.3	0.0	0.4	0.4			11.8			0.9	
Delay (s)		6.2	11.5	10.0	11.1			56.8			59.0	
Level of Service		A	B	A	B			E			E	
Approach Delay (s)		6.3			11.1			56.8			59.0	
Approach LOS		A			B			E			E	

Intersection Summary			
HCM 2000 Control Delay	12.6	HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio	0.65		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	61.5%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

This page replaces the prior version in its entirety.

Intersection	
Int Delay, s/veh	1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	463	23	0	752
Future Vol, veh/h	0	122	463	23	0	752
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	503	25	0	817

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	264	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	734	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	734	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	11	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	734	-
HCM Lane V/C Ratio	-	-	0.181	-
HCM Control Delay (s)	-	-	11	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.7	-

This page replaces the prior version in its entirety.

Queues

14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1191	193	91	1504	43	9
v/c Ratio	0.34	0.17	0.23	0.37	0.28	0.06
Control Delay	2.1	0.4	4.1	4.7	42.0	51.9
Queue Delay	0.0	0.0	0.0	0.1	0.0	0.0
Total Delay	2.1	0.4	4.1	4.8	42.0	51.9
Queue Length 50th (ft)	33	0	10	80	21	7
Queue Length 95th (ft)	20	0	45	376	58	24
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3460	1114	397	4104	482	150
Starvation Cap Reductn	0	0	0	1027	0	0
Spillback Cap Reductn	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.34	0.17	0.23	0.49	0.09	0.06

Intersection Summary

This page replaces the prior version in its entirety.

Queues

14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1722	37	17	1341	292	2
v/c Ratio	0.56	0.04	0.08	0.40	0.80	0.01
Control Delay	6.5	0.6	9.2	10.6	58.1	51.0
Queue Delay	0.2	0.0	0.0	0.0	3.8	0.0
Total Delay	6.7	0.6	9.2	10.6	61.9	51.0
Queue Length 50th (ft)	17	0	4	191	202	1
Queue Length 95th (ft)	m485	m0	m20	373	279	10
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3086	1007	225	3326	486	150
Starvation Cap Reductn	524	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	120	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.67	0.04	0.08	0.40	0.80	0.01

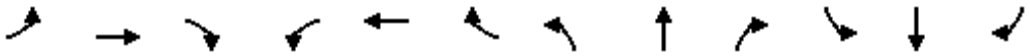
Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

FUTURE PLUS PROJECT – DRIVEWAY ANALYSIS
PROJECT ALTERNATIVE

HCM Signalized Intersection Capacity Analysis
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1155	178	84	1506	0	25	1	14	0	8	0
Future Volume (vph)	0	1155	178	84	1506	0	25	1	14	0	8	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1664			1801	
Flt Permitted		1.00	1.00	0.17	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	314	4916			1664			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1255	193	91	1637	0	27	1	15	0	9	0
RTOR Reduction (vph)	0	0	43	0	0	0	0	14	0	0	0	0
Lane Group Flow (vph)	0	1255	150	91	1637	0	0	29	0	0	9	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		78.5	78.5	93.3	93.3			8.1			2.0	
Effective Green, g (s)		78.5	78.5	93.3	93.3			8.1			2.0	
Actuated g/C Ratio		0.65	0.65	0.78	0.78			0.07			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		3215	1001	362	3822			112			30	
v/s Ratio Prot		0.26		0.02	c0.33			c0.02			c0.00	
v/s Ratio Perm			0.10	0.17								
v/c Ratio		0.39	0.15	0.25	0.43			0.26			0.30	
Uniform Delay, d1		9.6	8.0	4.2	4.5			53.1			58.3	
Progression Factor		0.19	0.02	1.06	1.49			1.00			1.00	
Incremental Delay, d2		0.3	0.2	0.3	0.3			1.2			5.6	
Delay (s)		2.1	0.4	4.9	7.0			54.3			63.9	
Level of Service		A	A	A	A			D			E	
Approach Delay (s)		1.9			6.8			54.3			63.9	
Approach LOS		A			A			D			E	

Intersection Summary			
HCM 2000 Control Delay	5.4	HCM 2000 Level of Service	A
HCM 2000 Volume to Capacity ratio	0.43		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	59.1%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

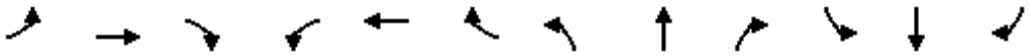
Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	908	122	0	717
Future Vol, veh/h	0	18	908	122	0	717
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	987	133	0	779

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	560	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	472	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	472	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	13	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	472	-
HCM Lane V/C Ratio	-	-	0.041	-
HCM Control Delay (s)	-	-	13	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1707	34	16	1318	0	169	8	91	0	2	0
Future Volume (vph)	0	1707	34	16	1318	0	169	8	91	0	2	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1666			1801	
Flt Permitted		1.00	1.00	0.06	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	112	4916			1666			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1855	37	17	1433	0	184	9	99	0	2	0
RTOR Reduction (vph)	0	0	16	0	0	0	0	17	0	0	0	0
Lane Group Flow (vph)	0	1855	21	17	1433	0	0	275	0	0	2	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Effective Green, g (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Actuated g/C Ratio		0.56	0.56	0.64	0.64			0.21			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		2777	865	124	3129			347			30	
v/s Ratio Prot		c0.38		0.00	c0.29			c0.17			c0.00	
v/s Ratio Perm			0.01	0.08								
v/c Ratio		0.67	0.02	0.14	0.46			0.79			0.07	
Uniform Delay, d1		18.2	11.5	12.6	11.2			45.1			58.1	
Progression Factor		0.34	1.00	0.83	1.13			1.00			1.00	
Incremental Delay, d2		0.1	0.0	0.5	0.4			11.8			0.9	
Delay (s)		6.4	11.5	10.9	13.1			56.8			59.0	
Level of Service		A	B	B	B			E			E	
Approach Delay (s)		6.5			13.1			56.8			59.0	
Approach LOS		A			B			E			E	

Intersection Summary			
HCM 2000 Control Delay	13.2	HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio	0.69		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	63.8%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Intersection	
Int Delay, s/veh	0.9

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	672	23	0	823
Future Vol, veh/h	0	122	672	23	0	823
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	730	25	0	895

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	378	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	620	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	620	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.4	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	620	-
HCM Lane V/C Ratio	-	-	0.214	-
HCM Control Delay (s)	-	-	12.4	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.8	-

This page replaces the prior version in its entirety.

Queues
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1255	193	91	1637	43	9
v/c Ratio	0.36	0.17	0.24	0.40	0.28	0.06
Control Delay	1.8	0.3	4.9	6.0	42.0	51.9
Queue Delay	0.0	0.0	0.0	0.1	0.0	0.0
Total Delay	1.8	0.3	4.9	6.1	42.0	51.9
Queue Length 50th (ft)	31	0	10	90	21	7
Queue Length 95th (ft)	19	m0	54	453	58	24
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3459	1114	377	4104	482	150
Starvation Cap Reductn	0	0	0	987	0	0
Spillback Cap Reductn	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.36	0.17	0.24	0.53	0.09	0.06

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

This page replaces the prior version in its entirety.

Queues

14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1855	37	17	1433	292	2
v/c Ratio	0.60	0.04	0.08	0.43	0.80	0.01
Control Delay	7.3	0.5	9.4	12.5	58.1	51.0
Queue Delay	0.4	0.0	0.0	0.2	9.3	0.0
Total Delay	7.7	0.5	9.4	12.6	67.4	51.0
Queue Length 50th (ft)	32	0	5	227	202	1
Queue Length 95th (ft)	m495	m0	m19	406	279	10
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3086	1007	209	3326	486	150
Starvation Cap Reductn	614	0	0	803	0	0
Spillback Cap Reductn	25	0	0	0	158	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.75	0.04	0.08	0.57	0.89	0.01

Intersection Summary

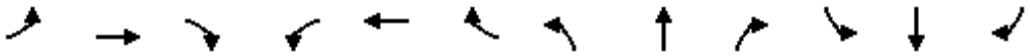
m Volume for 95th percentile queue is metered by upstream signal.

HORIZON YEAR PLUS PROJECT – DRIVEWAY ANALYSIS
PROJECT ALTERNATIVE

This page replaces the prior version in its entirety.

HCM Signalized Intersection Capacity Analysis
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1240	178	84	1615	0	25	1	14	0	8	0
Future Volume (vph)	0	1240	178	84	1615	0	25	1	14	0	8	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1664			1801	
Flt Permitted		1.00	1.00	0.15	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	278	4916			1664			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1348	193	91	1755	0	27	1	15	0	9	0
RTOR Reduction (vph)	0	0	43	0	0	0	0	14	0	0	0	0
Lane Group Flow (vph)	0	1348	150	91	1755	0	0	29	0	0	9	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		78.3	78.3	93.3	93.3			8.1			2.0	
Effective Green, g (s)		78.3	78.3	93.3	93.3			8.1			2.0	
Actuated g/C Ratio		0.65	0.65	0.78	0.78			0.07			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		3207	998	340	3822			112			30	
v/s Ratio Prot		0.27		0.02	c0.36			c0.02			c0.00	
v/s Ratio Perm			0.10	0.18								
v/c Ratio		0.42	0.15	0.27	0.46			0.26			0.30	
Uniform Delay, d1		10.0	8.0	4.5	4.6			53.1			58.3	
Progression Factor		0.14	0.01	1.09	1.56			1.00			1.00	
Incremental Delay, d2		0.3	0.2	0.4	0.4			1.2			5.6	
Delay (s)		1.7	0.3	5.3	7.6			54.3			63.9	
Level of Service		A	A	A	A			D			E	
Approach Delay (s)		1.5			7.5			54.3			63.9	
Approach LOS		A			A			D			E	

Intersection Summary			
HCM 2000 Control Delay	5.5	HCM 2000 Level of Service	A
HCM 2000 Volume to Capacity ratio	0.46		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	61.2%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

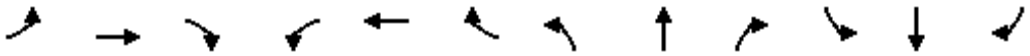
Intersection	
Int Delay, s/veh	0.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	18	967	122	0	763
Future Vol, veh/h	0	18	967	122	0	763
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	20	1051	133	0	829

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	592	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	449	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	449	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	13.4	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	449	-
HCM Lane V/C Ratio	-	-	0.044	-
HCM Control Delay (s)	-	-	13.4	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.1	-



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	1827	34	16	1415	0	169	8	91	0	2	0
Future Volume (vph)	0	1827	34	16	1415	0	169	8	91	0	2	0
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Lane Util. Factor		0.91	1.00	1.00	0.91			1.00			1.00	
Frt		1.00	0.85	1.00	1.00			0.95			1.00	
Flt Protected		1.00	1.00	0.95	1.00			0.97			1.00	
Satd. Flow (prot)		4916	1531	1711	4916			1666			1801	
Flt Permitted		1.00	1.00	0.06	1.00			0.97			1.00	
Satd. Flow (perm)		4916	1531	99	4916			1666			1801	
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	0	1986	37	17	1538	0	184	9	99	0	2	0
RTOR Reduction (vph)	0	0	16	0	0	0	0	17	0	0	0	0
Lane Group Flow (vph)	0	1986	21	17	1538	0	0	275	0	0	2	0
Turn Type	pm+pt	NA	Perm	pm+pt	NA	Perm	Split	NA			NA	
Protected Phases	5	2		1	6		3	3		4	4	
Permitted Phases	2		2	6		6						
Actuated Green, G (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Effective Green, g (s)		67.8	67.8	76.4	76.4			25.0			2.0	
Actuated g/C Ratio		0.56	0.56	0.64	0.64			0.21			0.02	
Clearance Time (s)		4.6	4.6	4.6	4.6			6.0			6.0	
Vehicle Extension (s)		3.0	3.0	3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)		2777	865	116	3129			347			30	
v/s Ratio Prot		c0.40		0.00	c0.31			c0.17			c0.00	
v/s Ratio Perm			0.01	0.09								
v/c Ratio		0.72	0.02	0.15	0.49			0.79			0.07	
Uniform Delay, d1		19.1	11.5	13.7	11.5			45.1			58.1	
Progression Factor		0.38	1.00	0.77	1.12			1.00			1.00	
Incremental Delay, d2		0.1	0.0	0.5	0.5			11.8			0.9	
Delay (s)		7.4	11.5	11.1	13.5			56.8			59.0	
Level of Service		A	B	B	B			E			E	
Approach Delay (s)		7.5			13.4			56.8			59.0	
Approach LOS		A			B			E			E	

Intersection Summary			
HCM 2000 Control Delay	13.6	HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio	0.72		
Actuated Cycle Length (s)	120.0	Sum of lost time (s)	21.2
Intersection Capacity Utilization	66.1%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Intersection	
Int Delay, s/veh	0.9

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	0	122	707	23	0	871
Future Vol, veh/h	0	122	707	23	0	871
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	0	133	768	25	0	947

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	-	397	0	0	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.94	-	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.32	-	-	-	-
Pot Cap-1 Maneuver	0	602	-	-	0	-
Stage 1	0	-	-	-	0	-
Stage 2	0	-	-	-	0	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	-	602	-	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s	12.7	0	0
HCM LOS	B		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBT
Capacity (veh/h)	-	-	602	-
HCM Lane V/C Ratio	-	-	0.22	-
HCM Control Delay (s)	-	-	12.7	-
HCM Lane LOS	-	-	B	-
HCM 95th %tile Q(veh)	-	-	0.8	-

This page replaces the prior version in its entirety.

Queues
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1348	193	91	1755	43	9
v/c Ratio	0.39	0.17	0.26	0.43	0.28	0.06
Control Delay	1.5	0.3	5.2	6.5	42.0	51.9
Queue Delay	0.0	0.0	0.0	0.1	0.0	0.0
Total Delay	1.5	0.3	5.2	6.6	42.0	51.9
Queue Length 50th (ft)	13	0	10	101	21	7
Queue Length 95th (ft)	19	m0	50	502	58	24
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3450	1111	353	4104	482	150
Starvation Cap Reductn	0	0	0	912	0	0
Spillback Cap Reductn	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.39	0.17	0.26	0.55	0.09	0.06

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

This page replaces the prior version in its entirety.

Queues
14: Project Driveway/Ivy St & Venice Blvd

09/18/2022

Lane Group	EBT	EBR	WBL	WBT	NBT	SBT
Lane Group Flow (vph)	1986	37	17	1538	292	2
v/c Ratio	0.64	0.04	0.08	0.46	0.80	0.01
Control Delay	8.6	0.5	8.8	12.8	58.1	51.0
Queue Delay	0.6	0.0	0.0	0.2	9.3	0.0
Total Delay	9.1	0.5	8.8	12.9	67.4	51.0
Queue Length 50th (ft)	71	0	4	253	202	1
Queue Length 95th (ft)	m500	m0	m17	447	279	10
Internal Link Dist (ft)	489			484	284	718
Turn Bay Length (ft)		85	100			
Base Capacity (vph)	3086	1007	201	3326	486	150
Starvation Cap Reductn	610	0	0	753	0	0
Spillback Cap Reductn	62	0	0	0	158	0
Storage Cap Reductn	0	0	0	0	0	0
Reduced v/c Ratio	0.80	0.04	0.08	0.60	0.89	0.01

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

CHAPTER 4
Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1**, *Mitigation Monitoring Program*, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the Crossings Campus Project (Project). However, the Project Site includes area within both the City of Culver City and the City of Los Angeles. Therefore, as applicable, the City of Culver City and the City of Los Angeles will be responsible for administering and implementing the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR, and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis,* of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes project design features identified throughout Chapter 4 the Draft EIR. Because project design features have been incorporated into the Project, they do not constitute mitigation measures. However, project design features are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The City of Culver City and City of Los Angeles will have responsibility for monitoring and reporting the implementation of the project design features and mitigation measures, as applicable, within their respective jurisdictions. The project design features and mitigation measures are identified by the impact category and numbered that correspond with the Initial Study, in the case of Biological Resources, and the Draft EIR.

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Aesthetics				
AES-PDF-1: Construction Fencing. Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
AES-PDF-2: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
AES-PDF-3: Glare. Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
AES-PDF-4: Lighting. Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent or nearby uses.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
Air Quality				
AQ-MM-1: Construction Equipment Features. The Project shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following: • During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment equal to or greater than 50 horsepower that will be used during any portion of the construction activities shall meet or exceed the Tier 4 Final standards. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. Alternate construction equipment	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
may be used if the construction contractor can document that the equipment would achieve the same or greater NOx reductions compared to Tier 4 Final standards. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for SCAQMD SOON funds. Information including the SCAQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities • During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions • Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited. • Construction activities shall be discontinued during an Air Quality Index (AQI) of 151 or more (unhealthy level). A record of any AQI at an unhealthy level and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Biological Resources				
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	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.	Culver City Planning Division; Los Angeles Department of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
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 and City of Los Angeles 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.				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources				
CUL-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety, and City Planning
CUL-MM-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to				Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located, to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resource(s). The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes. If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
effective to mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.				
CUL-MM-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division, Los Angeles Departments of Building and Safety and City Planning
Geology and Soils				
GEO-MM-1: Prior to the issuance of grading permits, the Applicant shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and Project progress meetings, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
GEO-MM-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall	Condition of Approval	Plan Check Notes, Reports, Surveys and	Prior to issuant of Demolition Permit, Grading Permit	Culver City Building Safety Division, Building Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per SVP Guidelines (2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on-site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.		Field Inspections	and Building Permit and Ongoing during Construction	Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety City Planning
GEO-MM-3: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located, to signify the satisfactory completion of the Project and required mitigation measures.				
Greenhouse Gas Emissions				
GHG-PDF-1: Green Building Features. The Project will include the following green building features: • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code and Culver City's Green Building Program Requirements. • The Project design will include sustainability features that will result in increased energy efficiency including water efficiency measures for landscaping and rainwater management, high efficiency plumbing fixtures, energy-star labeled appliances where possible and energy-efficient and water conserving HVAC systems.	Condition of Approval	Plan Check Notes	Prior to issuance of a Building Permit	Culver City Building Safety Division, Planning Division; Los Angeles Departments of Building and Safety and City Planning
Hazards and Hazardous Materials				
HAZ-MM-1: Health and Safety Plan. Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition on parcels within the Project Site, the Applicant for the specific work proposed shall	Condition of Approval	Plan Check Notes, Field Inspections	Prior to issuance of a Demolition or Grading Permit; Construction	Culver City Building Safety Division, Building Safety Inspector; Public

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192). The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. HASPs shall be submitted to Culver City and the City of Los Angeles building departments and any applicable oversight regulatory agency for review before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The HASP shall include, but not be limited to, the following elements: • Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP. • A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals. • Specified personal protective equipment and decontamination procedures, if needed. • The requirement to prepare documentation showing that HASP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees). • A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor. • Emergency procedures, including the route to the nearest hospital.			(during soil-disturbing activities)	Works, Engineering and Planning Division; Los Angeles Building and Safety Department

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
• Procedures to follow if evidence of potential soil or groundwater contamination is encountered (such as soil staining, noxious odors, debris or buried storage containers). These procedures shall be followed in accordance with hazardous waste operations regulations and specifically include, but not be limited to, immediately stopping work in the vicinity of the unknown hazardous materials release; notifying the city within which the contamination is encountered and the regulatory agency overseeing site cleanup, if any; and retaining a qualified environmental firm to perform sampling and remediation, if warranted.				
HAZ-MM-2: Soil and Groundwater Management Plan. In support of the HASP described in Mitigation Measure HAZ-MM-1, the contractor conducting excavation and disposal of fill and soil shall develop and implement a soil and groundwater management plan (SGMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity to manage contaminated materials, if encountered. The SGMP shall include the following, at a minimum: • Site description, including the hazardous materials that may be encountered. • Roles and responsibilities of on-site workers, supervisors, and the regulatory agency. • Training for site workers focused on the recognition of and response to encountering hazardous materials or unknown structures, e.g., underground storage tanks (USTs). • Notification requirements in the event of discovery of unknown structures or contamination. • Protocols for the materials (fill, soil, and dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.	Condition of Approval	Plan Check Notes, Field Inspections	Prior to issuance of a Demolition or Grading Permit; Construction (during soil-disturbing activities)	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
• Reporting requirement to the overseeing regulatory agency, if any contamination is found that requires agency oversight, documenting that site activities were conducted in accordance with the SGMP. The SGMP shall be submitted to Culver City and the City of Los Angeles Building Departments for review to inform their permit approval process before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The contract specifications shall mandate full compliance with all applicable federal, state, and local regulations related to the identification, transportation, and disposal of hazardous materials. The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction. For example, as part of the vapor intrusion				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
evaluation, at least two rounds of indoor and garage air sampling (including the parking level 1 office space) shall be conducted post-construction to confirm that future workers, valet parking personnel, and workers within the parking level 1 office space are protected and potential human health risks due to vapor intrusion are at or below target risk levels established by DTSC, as applicable. Sampling activities shall Include collection of samples when the HVAC system is on and off and also when the parking garage ventilation system is on and off. Given that benzene is a component of gasoline and will be present in the garage due to the parked cars, the air sampling activities shall focus on PCE to confirm that residual PCE in soil vapor does not pose a significant vapor intrusion risk to office workers, valet parking personnel, and workers working within the parking level 1 office space. The first round of sampling should be conducted before the buildings are occupied and the garages are in use. These air sampling activities will aid in the evaluation of the efficacy of the liner and the garage itself to mitigate vapor intrusion. These sampling activities will also help evaluate if any preferential pathways (e.g., utility conduits and elevator shaft) need to be addressed. The second round of sampling shall be conducted either 1) after preferential pathways have been mitigated, if any are identified based on the first round of sampling, 2) during the summer months if the first round of sampling was conducted during the fall or winter and air concentrations were below screening levels, 3) or a few months after the first round if it was conducted during the spring or summer and air concentrations were below screening levels. In the event the indoor air data indicate that risks are above target DTSC risk levels, as applicable, after pathways are sealed, the garage's ventilation system shall be adjusted to reduce vapor intrusion levels below acceptable risk levels, as applicable.				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
For work that would encounter groundwater, as part of the SGMP, contractors shall include a groundwater dewatering control and disposal plan specifying how groundwater (dewatering effluent) will be handled and disposed of in a safe, appropriate, and lawful manner. The groundwater portion of the SGMP shall include the following, at a minimum: • The locations at which groundwater dewatering is likely to be required. • Test methods to analyze groundwater for hazardous substances. • Appropriate treatment and/or disposal methods. • Discussion of discharge to a publicly owned treatment works or the stormwater system, in accordance with any regulatory requirements the treatment works may have, if this effluent disposal option is to be used.				
Noise				
NOI-PDF-1 : Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to abutting property owners and occupants. Evidence of such notification will be provided to the appropriate department of City of Culver City and City of Los Angeles. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating vibratory pile drivers and drills will be used.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of both cities.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-4 (Compliance with Noise Element): The following noise standards from Policy 2.A of the City's General Plan Noise Element shall be complied with at all times: A. No construction equipment will be operated without an exhaust muffler, and all such equipment will have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original manufacturer supplied equipment; B. All construction equipment will be properly maintained to minimize noise emissions; C. If any construction vehicles are serviced at an on-site location, the vehicle(s) will be setback from any street and other property lines so as to maintain a distance of at least	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
100 feet from the public right-of-way and from Noise Sensitive Receptors; D. Noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) will be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding as approved by the Planning Manager; and E. The Project will not allow any delivery truck idling for more than 5 minutes in the loading area. Signs will be posted prohibiting such idling.				
NOI-PDF-5: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-6: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources and City of Los Angeles Municipal Code Section 112.02 through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-7: Loading Dock Operating Hours. On-site loading dock operating hours will be limited to 7:00 a.m. to 10:00 p.m.	Condition of Approval	Plan Check Notes and Field Inspections	Ongoing during operation	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and

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				Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-8: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in the central courtyard such that the sound would be blocked by the proposed on-site building from off-site receivers. No amplified sound systems would be installed in the publicly accessible areas along the Project's street frontages. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. The systems will be designed so as not to result in a perceivable increase in noise beyond the Project Site. Specifically, daytime outdoor amplified sound systems will not result in an increase of 3 dBA L_{eq} over existing ambient noise conditions at the Project property line. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section 112.01, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction. All speakers will have a minimum setback of 25 feet from the Project property line and will be directed internally and acoustically shielded from off-site uses. Under the rare occasion of maximum crowd gathering in the central courtyard with temporary amplified sound systems, the combined sound level from speakers and people conversation shall not exceed the ambient noise level plus 5 dBA at an adjacent property line,	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
which would limit the speaker sound level to a maximum of 90 dBA when measured at a distance of 50 feet from the speakers. A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City and City of Los Angeles that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.				
NOISE-MM-1: Prior to the commencement of demolition, the Project shall provide a temporary 12-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north and west. In addition, a temporary 6-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 5 dBA along the southern boundary along Washington Boulevard, between the Project Site and the residences to the south and east of the Project Site. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the nearby noise-sensitive receptors during the duration of construction activities to the extent feasible. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel. At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions. The study will include a fencing/sound barrier plan for City review.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit, Verified at Preconstruction Meeting with City of Culver City and City of Los Angeles and Ongoing during Construction.	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
NOISE-MM-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
Public Services				
POL-PDF-1: Project Site Security and Access During Construction. During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety, Public Works, Fire and Police Departments
POL-PDF-2: Project Site Security and Access During Operation. During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces,	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and

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security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).				Planning Division; Los Angeles Department of Building and Safety, Public Works, Fire and Police Departments
Transportation				
TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning staff for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments. Prior to commencement of construction, the contractor will advise each City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City and/or City of Los Angeles staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and Ongoing during Construction	Culver City Building Safety, Planning, Public Works, Fire and Police Departments; Los Angeles Department of Transportation, and City Planning

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sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community: 1. Construction schedule and hours. 2. Framework for construction phases. 3. Identify traffic diversion plan by phase and activity. 4. Potential location of construction parking and office trailers. 5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6. Emergency access plan. 7. Demolition plan. 8. Staging plan for the concrete pours, material loading and removal. 9. Crane location(s). 10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers). 11. Community notification procedures. The CMP shall at a minimum include the following: 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations .				

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2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community and both the appropriate Cities of Culver City and Los Angeles personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by either the City of Culver City or the City of Los Angeles, depending on the jurisdiction of the roadway. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles and City of Culver City, will be developed and				

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implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the fire and police departments of each City to minimize potential effects on traffic flow and emergency response. 8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.				
TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement the following TDM measures subject to Culver City Transportation Department and LADOT review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site: • **TDM Support Services**: The Project will offer tailored trip planning assistance with in-house TDM coordinators. Assistance will be available for all employees online, by email, and by phone. The Project will also host a virtual kiosk every week to chat with a team member and have any questions answered. • **Marketing and Communications**: The Project will provide a comprehensive website detailing alternative	Condition of Approval	Approval of Plan	During Plan Check and prior to issuance of a Certificate of Occupancy	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Planning Division; Los Angeles Department of Transportation, and City Planning

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transportation options such as carpool, rail, shuttle, coach, bike, and options available for transportation once on campus. To provide transportation information to new employees, the Commute Program will make a presentation at New Employee Orientation. The Commute Program will also actively monitor email lists and group lists to discuss and collaborate with employees on improving commute programs. Information dissemination tools will include monthly news updates, web updates, email templates, lobby information centers, communication regarding service expansions, and attending internal employee events. • **Public Transit**: The Project will be served by an existing fixed-route intercampus shuttle program to provide connections to other Applicant-occupied buildings in Culver City and to public transit. The Project will also offer a monthly transit subsidy which provides a financial incentive for riding transit instead of driving to the Project Site. • **Rideshare**: The Project will provide an online tool that matches riders with drivers originating from similar locales. This will reduce single occupancy vehicle trips to and from the Project. • **Bicycling**: In addition to providing Code-required bicycle parking and shower facilities, the Project will provide a monthly subsidy to employees who commute by bicycle to work, which can be used to pay for bicycle, maintenance, and storage, or towards upgrading an existing bicycle or purchasing a new bicycle. The Project will also promote cycling by participating in the County's annual Bike to Work Day, providing discounts on select cycling products, providing a website that has information on safe cycling and cycling apps.				

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• **Walking**: The Project will provide enhanced access points to the site to improve pedestrian connectivity and expand adherence to the Americans with Disabilities Act (ADA). Employees will be educated on local neighborhood destinations within walking distance and will be encouraged to walk to events, meetings, and meals whenever possible. The areas surrounding the walkways and sidewalks will be well-landscaped and maintained, with pedestrian-oriented lighting to contribute to the safety of walking at night. • **Pre-tax Commuter Benefit**: A pre-tax commuter benefit will be provided to employees for commute-related expenses such as public transit (after the transit subsidy), vanpooling, and parking. The commuter benefit will supplement the transit and bicycle subsidies. • **Commuter Club**: A Commuter Club is an opt-in program that offers employees the opportunity to receive Commute Program email updates about schedule updates, new service, events, and programs. • **Commute Expert Program**: This program will provide people using a commute alternative an opportunity to meet other employees who are using the same mode who can "mentor" them by providing answers to questions about using that mode, stop locations, routes, or local transit options. • **Guaranteed Ride Home Program**: The Project will sponsor a guaranteed ride home for Project Site employees who came to work without their own car in the event of an unexpected situation or emergency when walking, biking, carpooling, or taking transit home will not be feasible. • **Intercampus Shuttles**: The Project will provide on-request fixed route intercampus shuttles between Apple-occupied buildings during work hours as well as				

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commuter shuttles from select points in and around the Los Angeles basin to the Project site during morning and evening commute hours. • **Campus Bike Share Program**: A Campus Bike Share program will be implemented to provide a transportation option between other buildings occupied by the Applicant. Campus bikes will be equipped with GPS tracking and an electronic rear-wheel lock to help secure the fleet. Campus bikes will be managed and maintained by a local bike maintenance vendor. • **On-site Services**: The Project will provide its employees with on-site amenities such as a full-service cafeteria, coffee bars, and shower facilities. The offered services will contribute to limiting the number of vehicle trips employees will need to take off-site during the day.				
Tribal Cultural Resources				
TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City and City of Los	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety and City Planning

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Angeles prior to the issuance of demolition permit for the Project. Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.				
TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City of Culver City and/or City of Los Angeles upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety and City Planning

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measure if the Native American Monitor fails to complete or submit any such monitoring logs.				
TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City of Culver City and/or City of Los Angeles determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the appropriate City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

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federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources. If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City of Culver City and/or City of Los Angeles. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City of Culver City and/or City of Los Angeles shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator. The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs. The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-				

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profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes. Notwithstanding the above paragraph, any information determined to be confidential in nature by the City of Culver City and/or City of Los Angeles Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).				
Utilities and Service Systems				
WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following: • **Fixtures** – High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less – Showerheads with a flow rate of 1.5 gallons per minute, or less – All utility, service and mop sinks will have a maximum flow rate of 1.5 gallons per minute – Condensate drain water capture and reuse for irrigation – An air cooled / air source mechanical cooling system will be utilized in lieu of cooling towers.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning

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