



Culver CITY

ADVANCE PLANNING DIVISION

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9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY

Project Title: Picture Culver City: General Plan 2045

Project Record Number: P2022-0053-GPE

Project Location: The City of Culver City is located in the southern part of Los Angeles County. The city comprises about 5 square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary. The Planning Area for the GPU covers about 3,910 acres, of which about 3,280 acres (84 percent) is within the city limits and about 630 acres (16 percent) is in unincorporated Los Angeles County. The Planning Area includes land within the City's jurisdictional boundaries and its Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city.

Project Sponsor: City of Culver City

Project Description: The City of Culver City is comprehensively updating its General Plan. The City must update its general plan periodically to respond to the changing needs and conditions of the city and region and to reflect new state laws. The General Plan 2045 will consist of 14 Elements. The following list of Elements are required by the State: Land Use and Community Design; Mobility; Housing; Noise; Conservation and Open Space; Safety; and Equity, Community Health, and Environmental Justice. In addition to the required Elements, the GPU will also include the following Elements: Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.

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

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

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

**City of Culver City, Advance Planning Division, 3rd Floor
9770 Culver Boulevard, Culver City, CA 90232**

www.culvercity.org

Contact: Lauren Marsiglia, Interim Advance Planning Manager
City of Culver City, Advance Planning Division 3rd Floor
9770 Culver Blvd, Culver City, CA 90232
(310) 253-5740 (Tel)
advance.planning@culvercity.org

The public is invited to comment on the INITIAL STUDY during the review period, which ends
April 4, 2022, at 5:30 PM

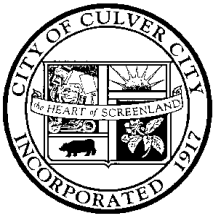


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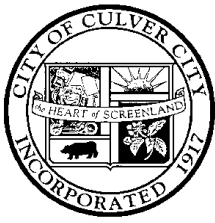
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ADVANCE PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	Picture Culver City: General Plan 2045		
Lead Agency Name & Address:	City of Culver City, Advance Planning Division, 9770 Culver Boulevard, 3 rd Floor, Culver City, CA 90232		
Contact Person, Phone No. & E-mail Address:	Lauren Marsiglia, Interim Advance Planning Manager phone: (310) 253-5740; e-mail: advance.planning@culvercity.org		
Project Location/Address:	The City of Culver City is located in the southern part of Los Angeles County. The City comprises about 5 square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary. The Planning Area for the GPU covers about 3,910 acres, of which about 3,280 acres (84 percent) is within the City limits and about 630 acres (16 percent) is in unincorporated Los Angeles County. The Planning Area includes land within the City's jurisdictional boundaries and its Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city.		
Nearest Cross Street:	N/A	APN:	N/A
Project Sponsor's Name & Address:	City of Culver City, Advance Planning Division 9770 Culver Boulevard, 3 rd Floor Culver City, CA 90232 advance.planning@culvercity.org (310) 253-5740 https://www.pictureculvercity.com		
General Plan Designation:	Low Density Single Family; Low Density Two Family; Low Density Three Family; Low Density Multiple Family; Medium Density Multiple Family; Planned Residential Development; Neighborhood Serving Corridor; General Corridor; Downtown; Community Serving Center; Regional Center; Industrial; Industrial Park; Light Industrial; Open Space; Cemetery; Studio; Ballona Creek; Institutional	Zoning:	Culver City: Residential Single Family (R1); Residential Two Family (R2); Residential Three Family (R3); Residential Low Density Multiple (RLD); Residential Medium Density Multiple (RMD); Residential High Density Multiple (RHD); Commercial Neighborhood (CN); Commercial General (CG); Commercial Community (CC); Commercial Downtown (CD); Commercial Regional Retail (CRR); Commercial Regional Business Park (CRB); Industrial Light (IL); Industrial General (IG); Planned Development (PD); Studio (S); Cemetery (E);

		Transportation (T); Open Space (OS); Unincorporated Los Angeles County: Light Agricultural (A-1); Heavy Agricultural (A-2); Residential-Family Residence (R-1)
Overlay Zone/Special District:	Residential Zero Setback Overlay (-RZ), Commercial Zero Setback Overlay (-CZ), Redevelopment Project Area Overlay (-RP), Civic Center Overlay (-CV), East Washington Boulevard Overlay (-EW), and Residential Hillside Overlay (-RH)	
<p>Project Description and Requested Action: The City of Culver City is comprehensively updating its General Plan. The City must update its General Plan periodically to respond to changing City and regional needs and reflect new state laws. The General Plan 2045 will consist of 14 Elements. The following list of Elements are required by the State: Land Use and Community Design; Mobility; Housing; Noise; Conservation and Open Space; Safety; and Equity, Community Health, and Environmental Justice. In addition to the required Elements, the GPU will also include the following Elements: Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.</p>		
<p>Existing Conditions of the Project Site: Existing developed land uses in the Planning Area include single family residential (covering 28.8 percent of the Planning Area); oil field (covering 13.9 percent of the Planning Area); retail and service uses (covering 10.9 percent of the Planning Area); and civic and institutional uses, which include places of worship, public and private schools (including West Los Angeles College), libraries, City Hall, police and fire stations, and other public uses (covering 10.5 percent of the Planning Area).</p>		
<p>Other public agencies whose approval may be required: <i>(e.g., permits, financing approval, or participation agreement)</i></p> <ul style="list-style-type: none"> ▪ South Coast Air Quality Management District ▪ Los Angeles Regional Water Quality Control Board ▪ Other agencies as needed. 		
<p>Consultation with California Native American tribes: <i>(Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?)</i></p> <p>The City will comply with applicable requirements regarding consultation with California Native American tribes.</p>		

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

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

Laura Mangini

Interim Advance Planning Manager, City of Culver City

March 1, 2022

Date

PURPOSE OF THE INITIAL STUDY:

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

The definitions for the types of impacts evaluated and shown in the headings for the table columns below are as follows:

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

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

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

Would the Project:

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES – Would the Project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:

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

X. HYDROLOGY AND WATER QUALITY – Would the Project:

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

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

XI. LAND USE AND PLANNING – Would the Project:

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

XII. MINERAL RESOURCES – Would the Project:

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

XIII. NOISE – Would the Project result in:

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING – Would the Project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XV. PUBLIC SERVICES

a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVI. RECREATION

a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVII. TRANSPORTATION – Would the Project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

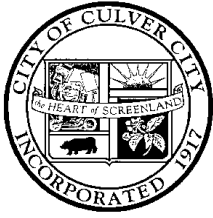
- a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place,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

XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:

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

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

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



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

The City of Culver City (City) is undertaking a comprehensive update to its General Plan, Picture Culver City: General Plan 2045 (GPU). A general plan serves as a city's primary guide for land use and development decisions and is a key tool for shaping and improving the quality of life for residents and businesses. It is a city's blueprint, or constitution, to guide change; thus, the City must update its General Plan periodically to respond to changing City and regional needs and conditions and to reflect new State laws.

Culver City's existing General Plan contains the following nine "elements" or topics, updated between 1968 and 2014:

- Land Use
- Circulation
- Housing
- Open Space
- Noise
- Conservation
- Seismic
- Public Safety
- Recreation

This comprehensive update to the General Plan is the first time all elements are being updated at the same time, aligning the entire Culver City General Plan with today's and tomorrow's community conditions and needs.

The GPU provides a framework and vision to guide change in the city through the year 2045, offering numerous benefits for Culver City including, but not limited to:

- Preserving and enhancing quality of life;
- Guiding economic growth for long-term fiscal sustainability;
- Directing housing decisions;
- Establishing clear and objective standards for (re)development;
- Clarifying the City's decision-making processes; and
- Promoting positive changes for the environment, health, and sustainability.

B. PROJECT LOCATION

Culver City is located in the southern part of Los Angeles County in Southern California, as shown in **Figure A-1, Regional and Project Vicinity**. The City comprises about five square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south, and by unincorporated areas of Los Angeles County along its eastern boundary. Culver City is approximately five miles east of the Pacific Ocean, five miles north of Los Angeles International Airport (LAX), and eight miles west of downtown Los Angeles. Interstate 405 (I-405) runs in a north-south direction in the western part of the city and Interstate 10 (I-10) runs in an east-west direction just outside of the city to the north. State Route 90 (SR-90) intersects Culver City from the west and ends at Slauson Avenue.

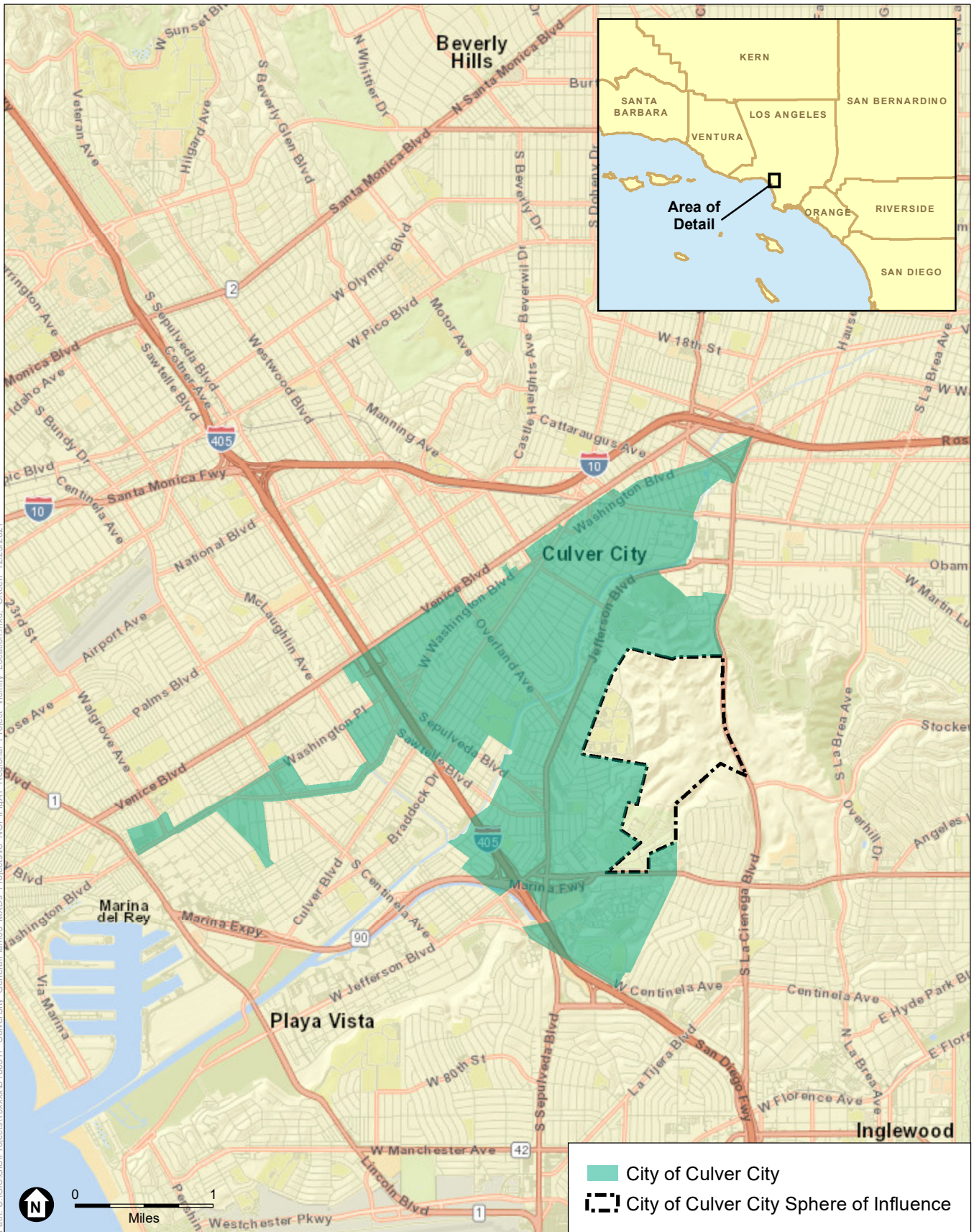
C. PLANNING AREA

The Planning Area for the GPU includes land within the City's jurisdictional boundaries and its Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city. The SOI is to the east of the City boundary in the Baldwin Hills area of Los Angeles County to the west of La Cienega Boulevard. The Planning Area covers about 3,910 acres, of which about 3,280 acres (84 percent) are within the City limits, with about 630 acres (16 percent) located within the SOI in unincorporated Los Angeles County. See **Figure A-2, GPU Planning Area**, for an aerial image of the Planning Area.

D. EXISTING CONDITIONS AND LAND USE

Existing developed land uses in the Planning Area include single family residential (covering 28.8 percent of the Planning Area); followed by oil field (covering 13.9 percent of the Planning Area); retail and service uses (covering 10.9 percent of the Planning Area); and civic and institutional uses, which include places of worship, public and private schools (including West Los Angeles College), libraries, City Hall, police and fire stations, and other public uses (covering 10.5 percent of the of the Planning Area).

The existing General Plan Land Use Map is depicted in **Figure A-3, Culver City Existing General Plan Land Use Map**. **Table A-1, Culver City Existing General Plan Land Use Designations**, provides the existing General Plan land use designations that apply throughout the Planning Area with acreage and percentage of land coverage for each land use category. Note that the residential, commercial, and industrial General Plan land use designations are grouped. Other General Plan land use designations include open space, cemetery, studio, Ballona Creek, and institutional land use designations. As shown in **Table A-1**, residential General Plan land use designations comprise the most area in the Planning Area and cover 1,408.1 acres (44 percent). Specifically, the Low Density Single Family General Plan land use designation comprises a majority of the residential areas, covering 733.6 acres (22 percent) of the Planning Area. The Open Space General Plan land use designation covers the second highest portion of the Planning Area at 633.0 acres (19.8 percent), though most of this acreage is within the SOI. Commercial land use designations comprise 501.1 acres (15.7 percent) of the Planning Area with Regional Center as the predominant land use designation, which covers 222.5 acres (7.0 percent). Finally, the industrial land use category comprises 226.6 acres (7.1 percent) of the Planning Area, with the Industrial land use designation comprising the majority of the industrial land uses and covering 135.6 acres (4.2 percent) of the Planning Area.

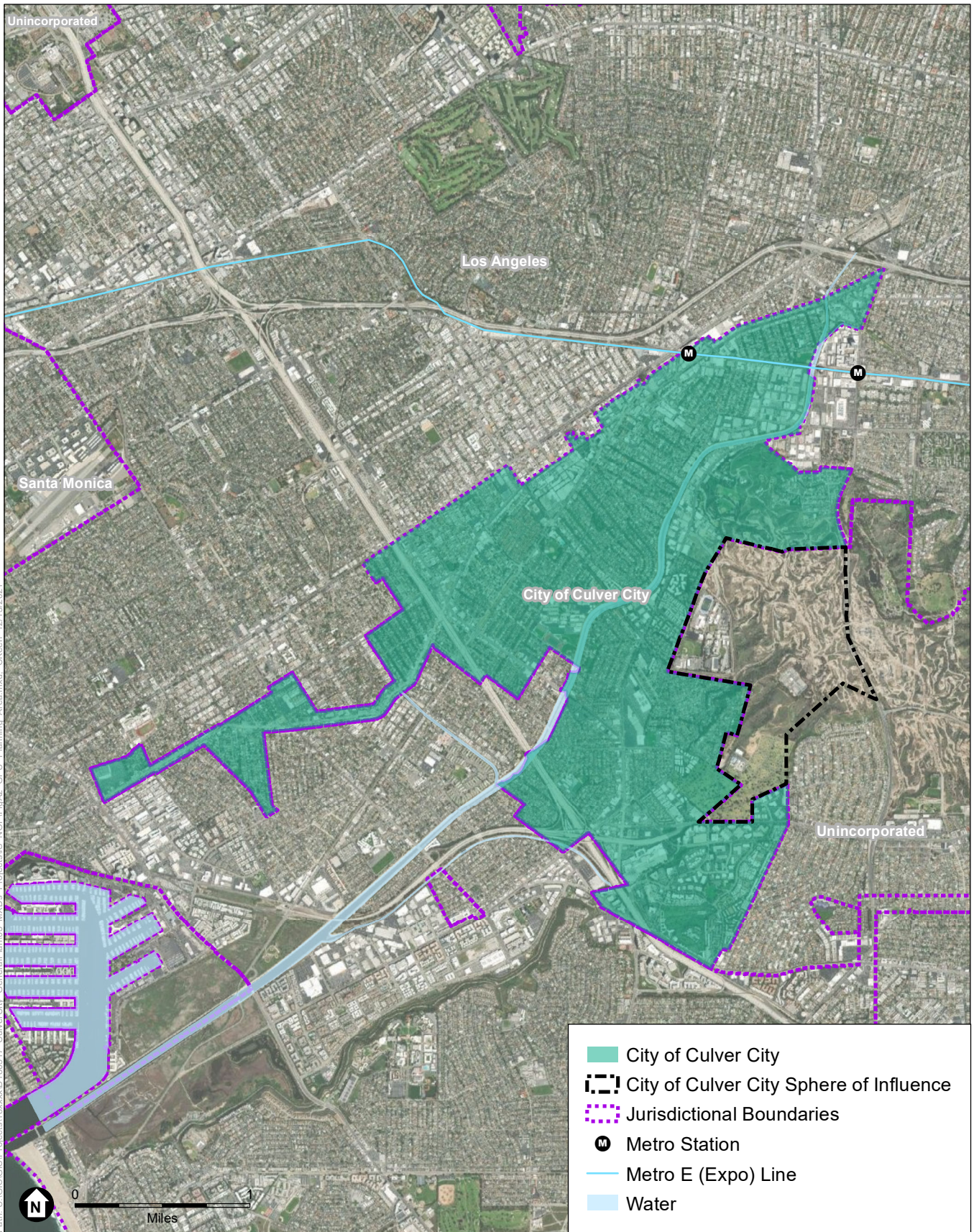


SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

Figure A-1
Regional and Project Vicinity

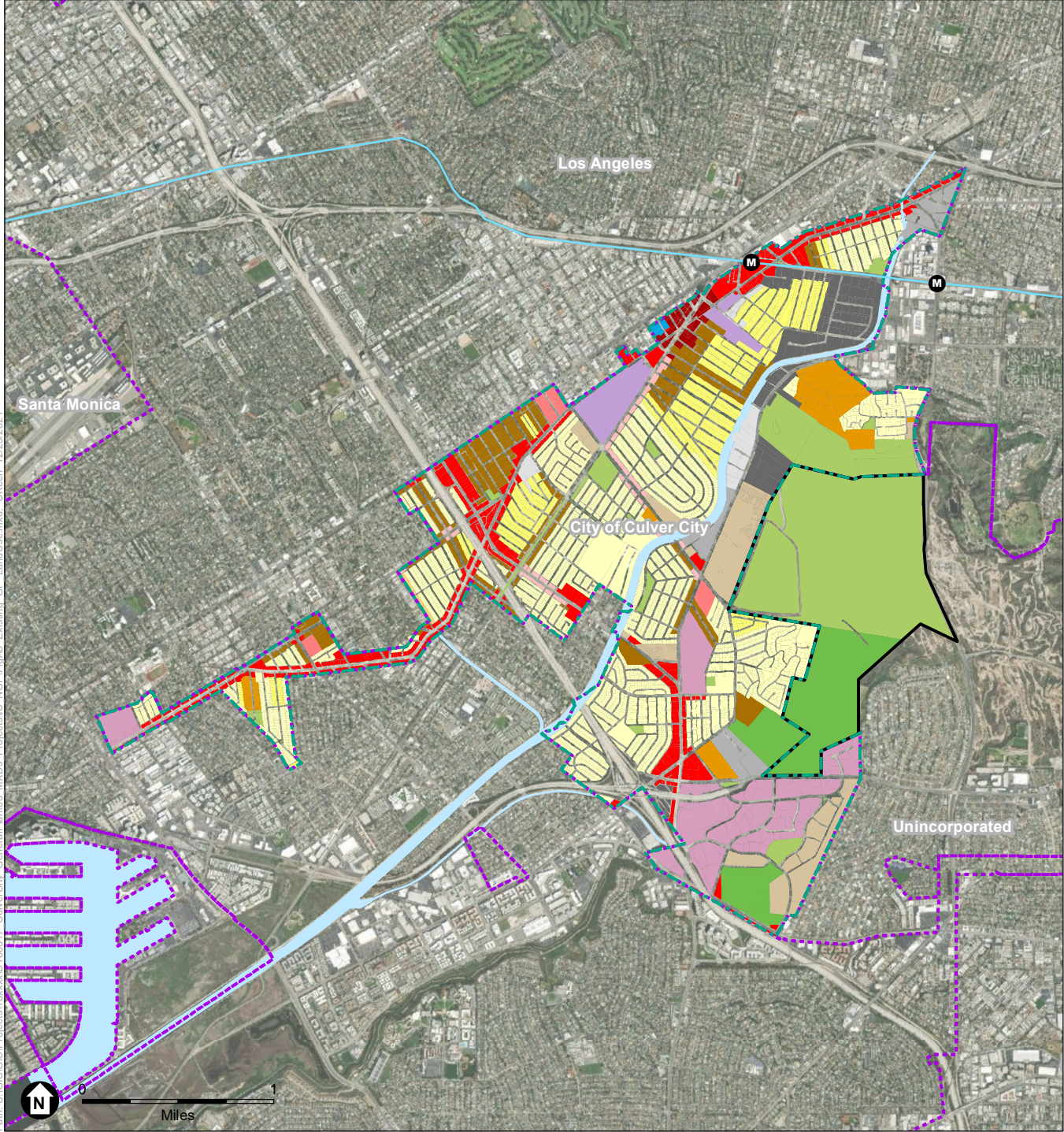
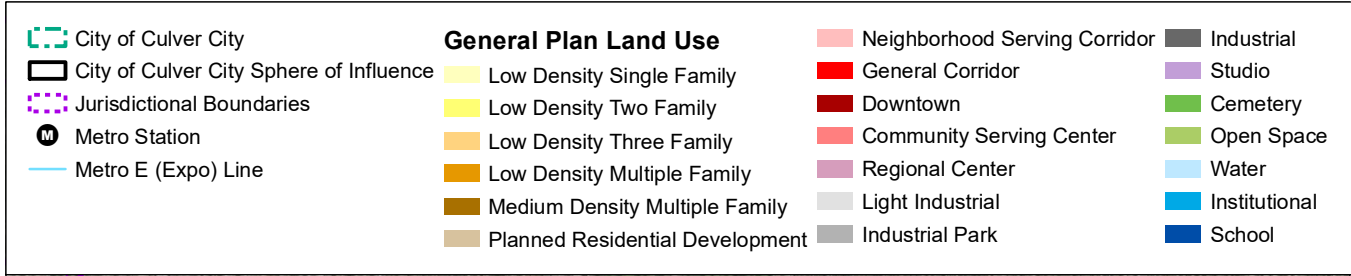




SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

Figure A-2
GPU Planning Area



SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

Figure A-3
Culver City Existing General Plan Land Use Map



**Table A-1
 Culver City Existing General Plan Land Use Designations**

Land Use Designation	Acres	Percentage¹
Residential	1,408.1	44.0
Low Density Single Family	733.6	22.9
Low Density Two Family	233.3	7.3
Low Density Three Family	4.3	0.1
Low Density Multiple Family	91.5	2.9
Medium Density Multiple Family	186.0	5.8
Planned Residential Development	159.5	5.0
Commercial	501.1	15.7
Neighborhood Serving Corridor	23.2	0.7
General Corridor	213.4	6.7
Downtown	20.1	0.6
Community Serving Center	21.8	0.7
Regional Center	222.5	7.0
Industrial	226.6	7.1
Industrial	135.6	4.2
Industrial Park	57.7	1.8
Light Industrial	33.4	1.0
Open Space	633.0	19.8
Cemetery	238.6	7.5
Studio	113.2	3.5
Ballona Creek	72.8	2.3
Institutional	3.5	0.1
Total²	3,196.9	100.0

NOTES:

¹ The area is calculated for land within the Planning Area.

² Totals may not add due to rounding.

SOURCES: City of Culver City, 2019; Raimi + Associates, 2019.

E. DESCRIPTION OF PROPOSED PROJECT

As proposed, the GPU will consist of 14 Elements. The following list shows which Elements are required by State law and describes their basic purposes.

1. **Land Use and Community Design Element** – Designates general distribution, intensity, and development policies regarding residential, commercial, industrial, open space, and institutional uses in the city.
2. **Mobility Element** – Identifies transportation systems and facilities and identifies goals, objectives, policies, and programs that address safety, equitable access, transit-oriented communities, and technology, among other topics.
3. **Housing Element** – Identifies and prioritizes the city’s housing needs and outlines the goals, policies, and programs to address those needs.
4. **Noise Element** - Identifies land uses sensitive to noise and noise sources. It also defines areas of noise impacts to limit the community's exposure to excess noises.

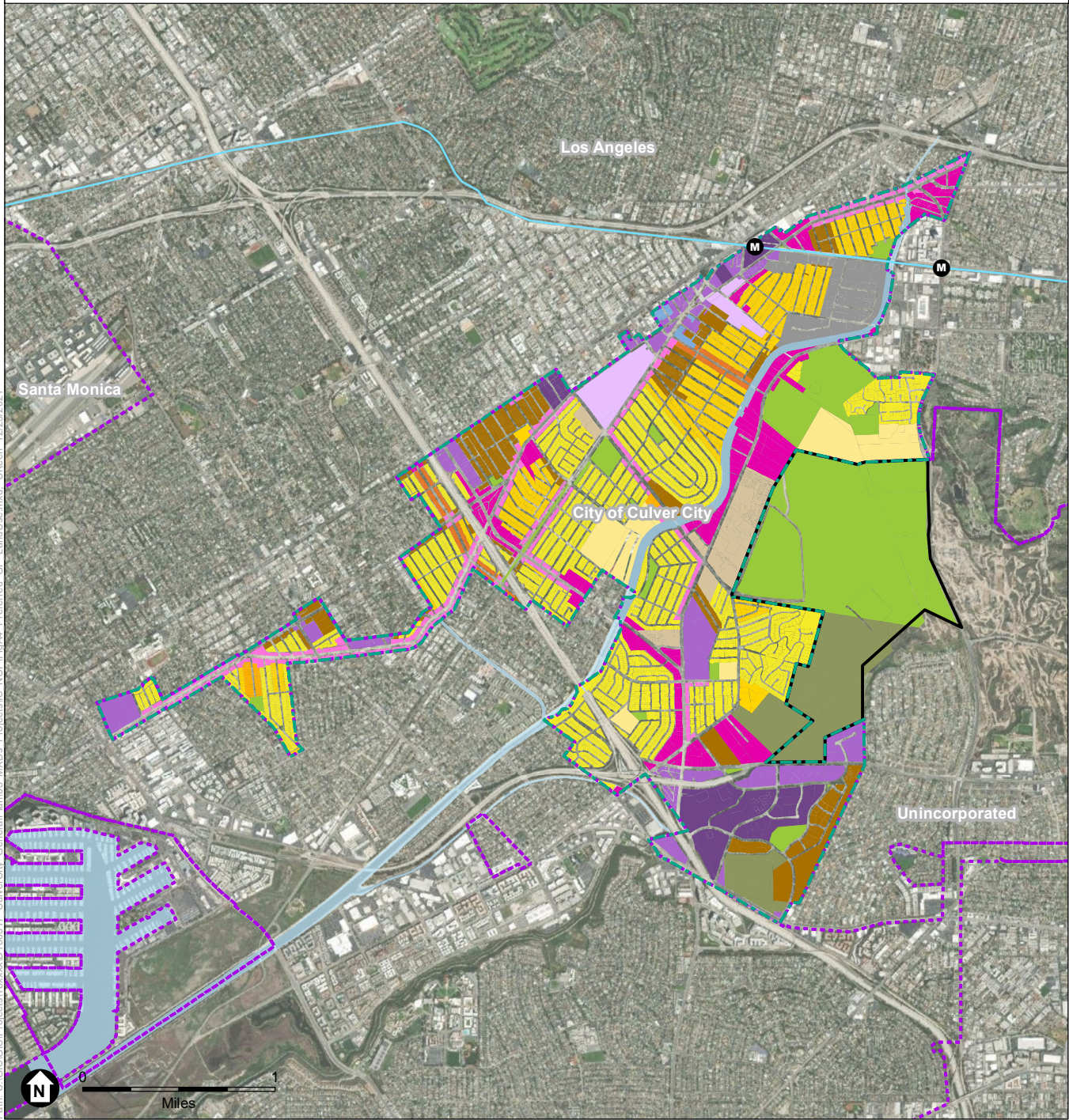
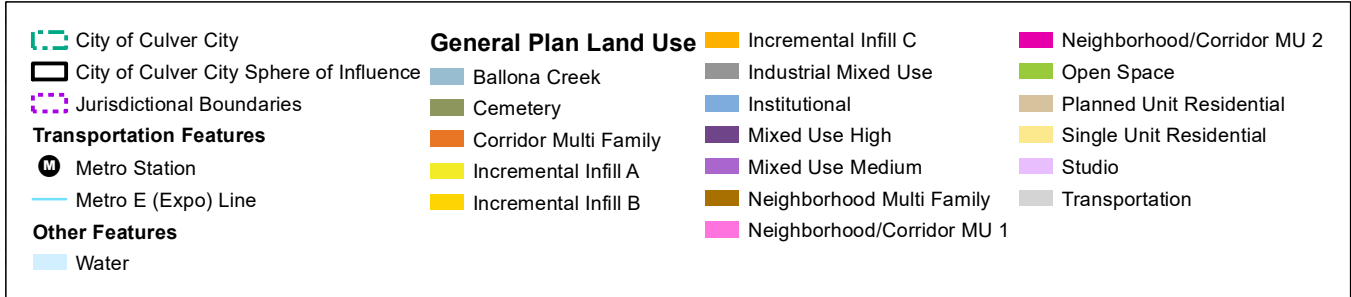
5. **Conservation and Open Space Element** - Identifies goals, objectives, policies, and programs that address cultural resources, biological resources, wildlife and plant species, the urban forest, stormwater, groundwater, air quality, mineral resources, and Ballona Creek.
6. **Safety Element** - Identifies and defines programs to protect the community from seismic, geologic, flood, and fire hazards and other hazards and hazardous materials.
7. **Equity, Community Health, and Environmental Justice Element** – Identifies goals, objectives, policies, and programs that address inequities, encourage quality housing development, increase health equity, and reduce the pollution burden.

In addition to the above required Elements, the GPU will also provide the following Elements: Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development, Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.

As part of the GPU, new General Plan land use designations are proposed to allow for more residential density and a greater mix of uses, including land use designations allowing multiple units per lot (e.g. Incremental Infill A, B, and C and Corridor Multi-Family, Neighborhood Multi-Family); a blend of residential, commercial, retail uses, and public spaces [Neighborhood/Corridor Mixed Use (MU) 1 and MU 2]; and a blend of retail stores, restaurant, hotels, services, residential, and office uses (MU Medium and High), among others. **Figure A-4**, *Culver City Preferred General Plan Land Use Designations Map*, illustrates the preferred designations under the GPU and **Table A-2**, *Preferred General Plan Land Use Designations*, lists the proposed designations under the GPU, their descriptions, and associated acreage.

Table A-3, *General Plan 2045 Population, Household, and Job Growth Projections*, provides the general growth projections for population, housing, and jobs under the GPU, the net change as it compares to the existing population, households, and jobs in the city and a comparison to the Culver City 1996 General Plan growth projections. As shown therein, the GPU projects a population of 61,600 persons in 2045, which is an increase of 23,119 persons, compared to the existing (2019) population. The GPU also projects 28,020 households in 2045, an increase of 11,016 households compared to the existing (2019) household count. Additionally, the GPU projects 83,000 jobs in 2045, which is an increase of 14,961 jobs compared to the existing (2019) job count.

Table A-4, *General Plan 2045 Buildout Projections by Land Use*, identifies anticipated residential land use changes and corresponding changes for nonresidential uses that would occur between 2019 and 2045 with implementation and full buildout of the GPU. As shown therein, the GPU projects a net increase of 12,450 residential units, 2,126,900 square feet of commercial uses, and 256,400 square feet of industrial uses. Note that the GPU does not project an increase of institutional uses.



SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

Figure A-4
Culver City Preferred General Plan Land Use Designation Map



**Table A-2
 Preferred General Plan Land Use Designations**

Proposed Designations	Maximum Density (du/ac)	Description	Acres
Incremental Infill A (for parcels <4,950 square feet)	8.7	<ul style="list-style-type: none"> Detached single unit residential, accessory dwelling units (ADUs), junior ADUs (JADUs) Standards consistent with existing residential single family (R1) zoning 	56.9
Incremental Infill A (for parcels ≥4,950 square feet)	35	<ul style="list-style-type: none"> Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and fourplexes Standards consistent with existing R1 zoning Allows up to 4 units per lot 4th unit must be affordable Triplex/fourplexes include ADUs and JADUs 	
Incremental Infill B	35	<ul style="list-style-type: none"> Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and fourplexes Standards consistent with existing residential two family (R2)/ residential three family (R3) zoning Allows up to 4 units per lot for R2 Allows up to 5 units per lot for R3 4th unit must be affordable Triplex/fourplexes include ADUs and JADUs 	253.6
Incremental Infill C	15	<ul style="list-style-type: none"> Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and low-density multi-family Standards consistent with existing Residential Low Density Multiple (RLD) zoning 	10.7
Corridor Multi-Family	30	<ul style="list-style-type: none"> Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and moderate density multi-family Standards consistent with Residential Medium Density Multiple (RMD) zoning Allows up to 9 units per lot 	27.1
Neighborhood Multi-Family	50	Mix of multi-family residential	212.2
Neighborhood/Corridor MU 1	35	Lower-scale, mixed use blending residential, commercial, and retail uses and public spaces serving both surrounding neighborhoods and visitors from nearby areas	113.8
Neighborhood/Corridor MU 2	50	Moderate-scale, mixed use blending residential, commercial, retail uses, and public spaces	217.2
Mixed Use Medium	65	A broad range of commercial, office, and residential uses serving both surrounding neighborhoods and visitors from nearby areas	183.6
Mixed Use High	100	High-intensity active uses and MU development, including retail stores, restaurant, hotels, services, residential, and office uses	140.9
Industrial Mixed Use	65	A transition between MU and high industrial areas with a mix of residential and industrial uses	87.4
Planned Unit Residential	Varies, depends on project	Planned residential complexes	82.1
Single Unit Residential	8.7	Detached single unit residential	201.1
Ballona Creek	N/A	Ballona Creek	66.4
Open Space	N/A	Parks, recreation complexes	454.3
Cemetery	N/A	Cemeteries	236.6

Proposed Designations	Maximum Density (du/ac)	Description	Acres
Institutional	N/A	Public facilities, including but not limited to government offices; parks, recreation, and community facilities; and hospital uses	7.4
Studio	N/A	Private studio campus with corporate headquarters, offices, facilities, and sets	65.3

N/A = not applicable

SOURCES: City of Culver City, City Council/Planning Commission Memo, June 28, 2021; Raimi and Associates, Designation Refinement Process, July 2021.

**Table A-3
 General Plan 2045 Population, Household, and Job Growth Projections**

	Existing (2019)	1996 General Plan Buildout (year 2010)	General Plan 2045 Buildout	Net Change (General Plan 2045 Buildout – Existing)
Population	38,481	41,330	61,600	23,119
Households	17,004	N/A ^a	28,020	11,016
Jobs	68,039	56,743	83,000	14,961

N/A = not applicable.

^a Note that the 1996 General Plan does not project households.

SOURCES: Raimi + Associates, Preferred Plan Growth Projections, September 2021; City of Culver City, existing land use data, 2019; City of Culver City, General Plan Land Use Element, 1996.

**Table A-4
 General Plan 2045 Buildout Projections by Land Use**

	Existing (2019)	New	Total	Net Change (Net - Existing)
Residential	17,010 units	12,450 units	29,460 units	12,450 units
Commercial^a	29,158,300 sf	4,682,000 sf	31,285,200 sf	2,126,900 sf
Industrial	1,881,100 sf	552,800 sf	2,137,500 sf	256,400 sf
Institutional	3,184,900 sf	-	3,184,900 sf	-

sf = square feet

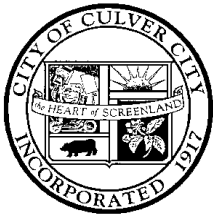
^a Note that studio uses, which are a defined General Plan land use designation, are included as part of the overall commercial square footage.

SOURCES: Raimi + Associates, Preferred Plan Growth Projections, September 2021; City of Culver City, existing land use data, 2019.

F. NECESSARY APPROVALS

The anticipated approvals required for the GPU are as follows:

- Certify EIR
- Adopt General Plan 2045
- Amend General Plan to comply with General Plan 2045
- Amend Code to comply with General Plan 2045



ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Would the Project:

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

Potentially Significant Impact. The majority of the Planning Area is highly urbanized, with a mix of residential, commercial, oil field, civic, institutional, park and open space, and industrial land uses, with associated transportation, flood control and utility infrastructure. The topography within the majority of the Planning Area is generally flat with more elevated areas of the Planning Area located in the eastern portions of the Planning Area, including Blair Hills/Baldwin Hills, the Culver Crest and Fox Hills neighborhoods, and within the SOI. From the most westerly extent of the Planning Area, the Pacific Ocean is about 1.43 miles to the west of the Planning Area. The Planning Area does not have any designated scenic vistas. However, the Blair Hills/Baldwin Hills offer expansive, long-range views, and various areas identified in Figure LU-3, Urban Design Analysis, within the existing General Plan Land Use Element have view corridors and view locations. Given the notable long-range views from the Blair Hills/Baldwin Hills and other locations within the Planning Area at higher elevations, substantial adverse effects on scenic vistas could occur with new development. Therefore, it is recommended that the EIR evaluate this topic further.

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

No Impact. The Planning Area does not have any City- or State-designated scenic highways. As such, development allowed under the GPU would not damage scenic resources located within the viewshed of a state scenic highway. Therefore, no impacts would occur, and an EIR need not evaluate this topic further.

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

Potentially Significant Impact. The majority of the Planning Area is highly urbanized. Although the GPU would include actions and programs to update or create standards and design guidelines to guide new development within the Planning Area, the GPU would result in an increase in development that could conflict with applicable zoning or other regulations governing scenic quality. Also, as portions of the SOI and Inglewood Oil Field and undeveloped hillside areas within the Planning Area would be considered non-urbanized, the EIR would evaluate whether visual character or quality of public views would be affected by development allowed under the GPU. Therefore, it is recommended that the EIR evaluate this topic further.

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

Potentially Significant Impact. The majority of the Planning Area is highly urbanized, and most areas of the City are subject to medium to high levels of nighttime lighting from sources such as street/freeway lighting, safety and security lighting, signage, and architectural lighting. The GPU would introduce new sources of nighttime illumination that could affect light sensitive land uses as development of new buildings and infrastructure occurs throughout the Planning Area. Therefore, it is recommended that the EIR evaluate this topic further.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The majority of the Planning Area is highly urbanized. The Planning Area does not contain agricultural uses or related operations and no areas are designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.¹ Furthermore, the General Plan does not identify any areas within the Planning Area as designated for agriculture use. Therefore, the GPU would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impacts would occur, and an EIR need not evaluate this topic further.

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

No Impact. No portion of the Planning Area is zoned for agriculture and no parcels within the Planning Area are enrolled under a Williamson Act contract. As such, the GPU would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur. Therefore, an EIR need not evaluate this topic further.

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

No Impact. As discussed in Response II.a, the majority of the Planning Area is highly urbanized. No forest land or timberland zoning is present within the Planning Area. As such, the GPU would not conflict with existing zoning for forest land or timberland, no impacts would occur, and an EIR need not evaluate this topic further.

¹ State of California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed November 16, 2021.

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

No Impact. No forest land exists within the Planning Area. As such, the GPU would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur, and an EIR need not evaluate this topic further.

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

No Impact. No agricultural uses or forestlands exist within the Planning Area. As such, the GPU would not involve converting farmland to other uses, either directly or indirectly. No impacts would occur, and an EIR need not evaluate this topic further.

III. AIR QUALITY

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

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

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

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

Potentially Significant Impact. The Planning Area is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O₃) standards and the current particulate matter (PM₁₀ and PM_{2.5}) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard for source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designate the Los Angeles County portion of the basin as attainment for lead. The GPU could result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality

standards for O₃, PM₁₀, and PM_{2.5}. As such, implementing the GPU could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Planning Area. Therefore, it is recommended that an EIR evaluate this topic evaluated further.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive residential uses are located throughout the Planning Area. Construction and operation of any new development allowed under the GPU could increase localized air emissions, carbon monoxide (CO) concentrations, and toxic air contaminants (TACs) at sensitive receptor locations within the Planning Area. Therefore, it is recommended that an EIR evaluate this topic further.

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

Less than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of volatile organic compounds from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Complying with the CARB Air Toxics Control Measure (ATCM) would minimize odors from the combustion of diesel fuel. The ATCM was adopted in 2004 and limits diesel-fueled commercial vehicle idling to five minutes at any given location. Development allowed under the GPU would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Construction activities and materials adhering with mandatory SCAQMD Rules and State measures would not result in other emissions that create objectionable odors. Accordingly, development occurring under the GPU is not expected to generate emissions leading to nuisance odors that would adversely affect nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. While it is unknown whether development allowed under the GPU would involve the types of uses associated with odor complaints, the developments allowed under the GPU would include proper housekeeping practices for trash receptacles and other components or activities, thereby avoiding adverse odor impacts. Similar to construction, the developments allowed under the GPU would also adhere to SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Impacts related to odors would be less than significant, and an EIR need not evaluate this topic further.

IV. BIOLOGICAL RESOURCES

Would the Project:

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

Potentially Significant Impact. While the majority of the Planning Area is highly urbanized, remnant patches of native vegetation remain, particularly within the Kenneth Hahn State Recreation Area and Inglewood Oil Field. These patches of native vegetation, and to a lesser degree ornamental and landscaped vegetation, provide suitable habitat for a variety of special-status plant and wildlife species and nesting birds. As the city continues to develop, there may be increasing pressure to develop sites within or adjacent to the remnant patches of native

vegetation, which may impact species identified as candidate, sensitive, or special status species. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. As discussed under Response IV.a, the Planning Area includes remnant patches of native vegetation. As such, development allowed under the GPU may have a potentially significant impact on these patches of native vegetation or other sensitive natural communities. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

Potentially Significant Impact. No wetlands, as designated by the California Department of Fish and Wildlife (CDFW), Los Angeles Regional Water Quality Control Board (LARWQCB), or U.S. Army Corps of Engineers are present within the Planning Area. However, these agencies would likely consider the channelized portion of Ballona Creek as jurisdictional. Development allowed under the GPU may impact this or other jurisdictional wetland features within the Planning Area. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. While the majority Planning Area is highly urbanized, the Planning Area does include remnant patches of native vegetation and jurisdictional wetland features. Development allowed under the GPU may impact the movement of native resident or migratory fish or wildlife species within the Planning Area. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The City's Urban Forest Master Plan facilitates the preservation, management, and enhancement of the City's urban forest and protects trees. The portion of the Planning Area within unincorporated Los Angeles County is also subject to a County Ordinance that protects trees of the oak tree genus. Development allowed under the GPU may require the removal of existing trees, including street trees or protected trees. Therefore, it is recommended that an EIR evaluate this topic further.

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

No Impact. There are no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans in place for the Planning Area. As such, the GPU would not impact these plans, and an EIR need not evaluate this topic further.

V. CULTURAL RESOURCES

Would the Project:

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

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

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

The vast majority of the Planning Area is heavily developed and there are numerous historic resources throughout the Planning Area, many of which are listed or have the potential to be eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and/or the City's list of Cultural Resources. The City has three designated historic districts located on Braddock Drive, Lafayette Place, and McConnell Boulevard. The Washington Building, Citizen Building, and Culver Hotel are on the National Register of Historic Places. The Culver City Ice Arena is considered a locally significant cultural resource. Development allowed under the GPU could directly or indirectly impact historical resources. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. There is potential for development allowed under the GPU to encounter undiscovered buried archaeological resources because of the region's historical occupation, past discoveries of archaeological resources in the City, and the favorable natural conditions (e.g., proximity to the Pacific Ocean and the presence of Ballona Creek and vegetation communities) that attracted historical inhabitants to the area. Moreover, archaeological monitoring of numerous construction projects throughout the region in recent years has uncovered multiple buried archaeological deposits. Furthermore, development and construction activities allowed under the GPU, such as grading and excavation for building foundations and excavation for subterranean parking, could impact archaeological resources. Therefore, it is recommended that an EIR evaluate this topic further.

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

Less Than Significant Impact. Development allowed under the GPU may involve excavation into native soils, with the potential to encounter previously unknown human remains. Various regulatory provisions address how to handle human remains that could be inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Under these codes, if unrecorded human remains are discovered during construction within the Planning Area, excavation would be halted and the County Coroner would be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24 hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant, and an EIR need not evaluate this topic further.

VI. ENERGY

Would the Project:

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

Potentially Significant Impact. The GPU could intensify development within the Planning Area and therefore, increase energy consumption during construction and operation associated with electricity, natural gas, and transportation fuel. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Development allowed under the GPU would be required to comply with the California Green Building Standards (CALGreen Code) pursuant to Title 24, Part 11 of the California Code of Regulations (CCR). In addition, development would be required to implement applicable energy and resource conservation measures, such as those described in CARB’s Assembly Bill (AB) 32 Climate Change Scoping Plan and supporting documents. Development would also need to comply with policies related to renewable energy and energy efficiency, including Culver City’s mandatory Green Building Program requirements. However, further evaluation in an EIR is required to determine if buildout under the GPU would be consistent with State or local plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

Would the Project:

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

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

Potentially Significant Impact. Numerous active and inactive faults cross the seismically active Southern California region. Fault rupture is the displacement that occurs along the sides of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active if they have shown evidence of movement within the past 11,700 years (i.e., during the Holocene Epoch). The criteria

for defining an active fault is based on standards developed by the CGS for the Alquist-PR iolo (AP) Earthquake Fault Zoning Program.² Faults that have not moved in the last 11,700 years are not considered active.

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

The Planning Area is located within the seismically active Southern California region. Specifically, the Newport-Inglewood Fault Zone, which is considered an AP Earthquake Fault Zone, passes through the northern portion of the Planning Area. As such, the GPU could expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. To adequately address these conditions, an EIR will further analyze this topic to determine potential impacts associated with rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

Potentially Significant Impact. Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. The Planning Area is located within the seismically active Southern California region. As such, development allowed under the GPU would be subject to the seismic design criteria of the California Building Code (CBC) and the specific design requirements of a geotechnical report. The CBC contains seismic safety provisions that aim to prevent building collapse during a design earthquake. Compliance with these regulations and requirements would minimize injury and loss of life due to building collapse during an earthquake.

Conformance to the CBC would allow project construction to be feasible from a geotechnical standpoint. Since the Planning Area is located within the seismically active Southern California region, the GPU could expose people or structures to strong seismic ground shaking. To adequately address these conditions, an EIR will further analyze this topic to determine potential impacts associated with strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a phenomenon in which soils below the groundwater table, ranging from saturated silty to cohesionless, are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions, such as those induced by an earthquake. Liquefaction effects include

² Bryant, W.A., and Hart, E.W., Fault-Rupture Hazard Zones in California – Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps: California Geological Survey Special Publication 42, page 42, 2017.

loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Liquefaction typically occurs in areas where groundwater is less than 50 feet from the surface, and where the soils are composed of poorly consolidated, fine- to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction. According to the State of California Seismic Hazard Zone Map, portions of the Planning Area are located in an area mapped as potentially liquefiable.³ Specifically, most of the city is in an area of elevated liquefaction risk, except for the City's northwestern and southeastern borders. Therefore, it is recommended that an EIR evaluate this topic further.

iv. Landslides?

Potentially Significant Impact. The terrain of the Planning Area is mostly level or comprised of rolling hills that vary in elevation from 40 feet above mean sea level on the west to about 100 feet in the central part. The Baldwin Hills in the northeastern portion of the Planning Area rise to above 400 feet above mean sea level, and there are also hillside areas in Culver Crest susceptible to landslides. As some elevated areas within the Planning Area are potentially at risk from landslides, it is recommended that an EIR evaluate this topic further.

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

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

Ground surface disruption that would occur during construction would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementing standard erosion control measures imposed during site preparation and grading activities. Development within the Planning Area would be subject to existing regulations associated with protecting water quality. Construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the California Building Code (CBC) and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the LARWQCB, as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during construction. Following construction within the Planning Area, development sites would be covered by paving, structures, and landscaping, with limited potential for erosion. Since the Planning Area includes hillside areas that may result in erosion or the loss of topsoil, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Impacts related to liquefaction and landslides are discussed in Response Vaira. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and

³ California Department of Conservation, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 22, 2021.

structures. Lateral spreading during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place towards a free face and to lesser extent on ground surfaces with a very gentle slope. It is recommended that an EIR further analyze the potential for lateral spreading, subsidence, liquefaction, and collapse.

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

Potentially Significant Impact. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Development allowed under the GPU may be located on expansive soils. Therefore, it is recommended that an EIR evaluate this topic further.

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

No Impact. The Planning Area is served by municipal wastewater infrastructure. It is expected that development allowed under the GPU would connect to existing mainlines and service lines, which are largely located in surrounding roadways. As such, future development would not use septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur, and an EIR need not evaluate this topic further.

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

Potentially Significant Impact. There is potential to encounter undiscovered buried paleontological resources given the prehistoric occupation of the region and the favorable natural conditions (e.g., proximity to the Pacific Ocean and the presence of Ballona Creek and vegetation communities) that attracted prehistoric inhabitants to the area. Development and construction activities, such as grading and excavation for building foundations, subterranean parking, and underground infrastructure; allowed under the GPU could impact paleontological resources in undisturbed native soils. Therefore, it is recommended that an EIR evaluate this topic further.

VIII. GREENHOUSE GAS EMISSIONS

Would the Project:

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

Potentially Significant Impact. Construction and operation of development allowed under the GPU could generate greenhouse gas (GHG) emissions with the potential to either individually or cumulatively result in a significant impact on the environment. In addition, such development could generate vehicle trips that would contribute to GHG emissions. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Development allowed under the GPU would be required to comply with the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen Code. Development that conforms with these requirements would be designed to reduce GHG emissions through various energy and resource conservation measures. In addition, development would implement

applicable energy and resource conservation measures to reduce GHG emissions, such as those described in CARB's Assembly Bill (AB) 32 Climate Change Scoping Plan and supporting documents, which describe the approaches the State will take to reduce GHG emissions to 1990 levels by 2020. CARB adopted the 2017 Climate Change Scoping Plan in response to Senate Bill (SB) 32 that outlines the State strategy for meeting the GHG reduction target for the State of 40 percent below 1990 levels by 2030. The EIR will provide a consistency analysis with the above-mentioned requirements. In addition, the analysis will also be consistent with the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS). Further evaluation in an EIR is required to determine if development allowed under the GPU would conflict with these plans, policies, and regulations.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the Project:

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

Potentially Significant Impact. Construction occurring under the GPU would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils, among others. Materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, emissions from the routine use of such materials would be minimal. Operations associated with new development allowed under the GPU would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with applicable laws, regulations and manufacturers' instructions for use, storage, and disposal of such products. As with construction emissions, emissions from the use of such materials would be minimal and localized to the site of development. However, it is recommended that an EIR further analyze this topic.

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

Potentially Significant Impact. Construction occurring under the GPU could potentially produce hazardous wastes associated with the use of asphalt, paint, petroleum, and other solvents. All hazardous materials would be required to be used and transported according to regulations. In addition, oil or gas pipelines within the Inglewood Oil Field could be damaged during an earthquake. Due to the ages of the buildings that may be affected during construction of developments allowed under the GPU, there is potential for asbestos and lead-based paint to be encountered. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Several schools are located throughout the Planning Area, including the El Marino Language School, El Rincon Elementary School, La Ballona Elementary School, Linwood E. Howe Elementary school, Culver City Middle School, and Culver City High School. Construction of development allowed under the GPU could involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. In addition, there is a potential for future industrial uses to be cited adjacent to or near existing or proposed schools. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 discusses preparing a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [Underground Storage Tanks (USTs), Department of Defense, Site Cleanup Program] and permitted facilities, such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board. As there is a potential for development sites within the Planning Area to be located on a hazardous materials site as identified by Government Code Section 65962.5, it is recommended that an EIR evaluate this topic further.

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

No Impact. The Planning Area does not include an airport land use plan or a public airport. The nearest airports to the Planning Area are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located about three miles west and five miles southwest of the Planning Area, respectively. Therefore, the GPU is not located within an airport land use plan area and would not result in airport-related safety hazards or excessive noise for people residing or working in the Planning Area. No impacts would occur, and an EIR need not evaluate this topic further.

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

Potentially Significant Impact. The Planning Area is an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for development allowed under the GPU would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In addition, roadway or infrastructure developments may also be allowed under the GPU which may affect an adopted emergency response plan or emergency evacuation plan. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The wildland-urban interface (WUI) is present in the eastern portion of the Planning Area. Wildlands located within Los Angeles County are directly adjacent to the Blair Hills and Culver Crest neighborhoods. Cal Fire prepares fire hazard severity maps including mapping areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors, referred to as Fire Hazard Severity Zones

(FHSZ). According to the Los Angeles County FHSZ map, the eastern portion of the Planning Area is located in a Very High Fire Severity Zone (VHFSZ), which includes portions of the Blair Hill and Culver Crest neighborhoods and Inglewood Oil Field, considered a WUI.⁴ Therefore, it is recommended that an EIR evaluate this topic further.

X. HYDROLOGY AND WATER QUALITY

Would the Project:

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

Potentially Significant Impact. Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. Construction occurring under the GPU would require earthwork, including grading and excavation of development sites. During precipitation events, construction activities have the potential to result in soil erosion due to grading and soil stockpiling, with subsequent siltation, and potential for conveyance of pollutants into storm drains. In addition, the Conservation and Open Space Element of the GPU will identify goals, objectives, policies, and programs that address stormwater and groundwater. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The Golden State Water Company provides water to Culver City. The Golden State Water Company gets its water supply for the Culver City system by purchasing imported water from the West Basin Municipal Water District. The West Basin Municipal Water District gets its imported water supply from the Metropolitan Water District of Southern California. Imported water makes up 100 percent of the available water supply and is projected to make up 100 percent of the future water supply. There are currently no sources of groundwater supplying the city. However, the Conservation and Open Space Element of the GPU will identify goals, objectives, policies, and programs that address stormwater and groundwater. Therefore, it is recommended that an EIR evaluate this topic further.

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

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

Potentially Significant Impact. The majority of the Planning Area is almost completely developed with impermeable surfaces; the Planning Area includes about 15.6 acres of vacant land. Ballona Creek runs central through the Planning Area, extending from the northeast portion of the Planning Area to the western boundary, where it continues to Ballona Estuary and the Pacific Ocean. The developments allowed under the GPU would likely involve replacing the impermeable surfaces and small areas of exposed landscaped and disturbed soils. However, some developments may occur on undeveloped sites where existing drainage patterns may result in substantial erosion or siltation on- or off-site. Therefore, it is recommended that an EIR evaluate this topic further.

⁴ California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>. Accessed October 5, 2021.

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

Potentially Significant Impact. While projects occurring under the GPU are under construction, the rate and amount of surface runoff generated at the development sites would fluctuate because exposed soils could absorb rainfall as surface flow. As discussed in Response X.c.i, some development may occur on undeveloped sites where existing drainage patterns could substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. As discussed in Response X.c.i and ii, some development occurring under the GPU may increase the rate or amount of surface runoff. This increased runoff could exceed the capacity of existing or planned stormwater drainage systems. Also, the GPU's Conservation and Open Space Element will identify goals, objectives, policies, and programs that address stormwater and groundwater. Therefore, it is recommended that an EIR evaluate this topic further.

iv. Impede or redirect flood flows?

Potentially Significant Impact. According to the Federal Emergency Management Agency (FEMA), the northern part of the Planning Area is at an elevated risk for flood. A small area, bordered roughly by Ballona Creek, Fairfax Avenue, and Adams Boulevard lies within a 100-year flood zone for a 1- to 3-foot flood. This means that there is a one in 100 chance that a flood event enough to cause 1 to 3 feet of inundation will occur in any given year (Zone AO). Two additional areas nearby, one between Eastham Drive and Ballona Creek and the second in the area immediately adjacent to Ballona Creek between National Boulevard and Sent Ney Avenue, are also within a 100-year flood zone, although FEMA does not specify the potential amount of inundation in this area (Zone A). Another part of the city, between Adams Boulevard and Dauphin Street, is at risk from a flood capable of causing inundation of less than 1-foot with a chance of occurring between one in 100 and one in 500 in any given year (Zone X). Construction activities for the developments allowed under the GPU could potentially alter on-site drainage patterns and the rate and amount of surface runoff from the development site. Therefore, it is recommended that an EIR evaluate this topic further.

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

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

As discussed in Response X.c.iv, the Planning Area is mapped within a variety of flood zones, including Zone AO and Zone A. Therefore, it is recommended that an EIR evaluate this topic further.

According to the Tsunami Hazards Area Map, the Planning Area is not located within mapped tsunami inundation boundaries.⁵ Therefore, the developments allowed under the GPU would not be subject to flooding hazards associated with tsunamis.

⁵ California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles. Accessed November 22, 2021.

As provided in the Culver City Natural Hazards – Fire and Flooding Map, portions of the Planning Area are located within inundation areas.⁶ Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Development allowed under the GPU may involve excavation for below-grade structures requiring dewatering that could affect water quality or groundwater control and management plans. Therefore, it is recommended that the EIR evaluate this topic further.

XI. LAND USE AND PLANNING

Would the Project:

a. Physically divide an established community?

Potentially Significant Impact. The GPU involves a comprehensive update to the City’s General Plan, including changes to the City’s Land Use Element, land use designations, and other General Plan elements that could result in physical division of areas within the city. As it is possible that established areas of the city could be physically divided as a result of implementation of the GPU, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The GPU involves a comprehensive update to the City’s General Plan, including changes to the City’s Land Use Element, land use plan, and land use policies and policies associated with other General Plan elements that are being updated. As such, it is possible that implementing the GPU could cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Therefore, it is recommended that an EIR evaluate this topic further.

XII. MINERAL RESOURCES

Would the Project:

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

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

Potentially Significant Impact (a–b). Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans. Mineral resources could include oil wells, natural gas wells, and mineral deposits, among others. The Inglewood Oil Field is located within the Planning Area, both within areas of the city and the unincorporated area of Los Angeles County known as Baldwin Hills. The current, active Inglewood Oil Field boundaries encompass about 1,000 acres, of which 78 acres are located within Culver City. Development allowed under the GPU may encroach on the boundaries of

⁶ City Culver City, Natural Hazards – Fire and Flooding, February 1, 2007.

the Inglewood Oil Field or other oil or gas wells within the Planning Area. Therefore, it is recommended that an EIR evaluate this topic further.

XIII. NOISE

Would the Project result in:

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

Potentially Significant Impact. Construction activities occurring under the GPU could generate temporary, periodic, and potentially permanent sources of noise. Periodic noise could also be generated within developed areas of the Planning Area from sources such as delivery loading and unloading, landscape maintenance, sports activities and special events. Permanent increases in ambient noise could also result from incremental increases in traffic volumes due to growth under the GPU and other changes in circulation proposed as part of the update to the Circulation Element. Potential increase in noise levels could exceed Culver City General Plan and/or Culver City Municipal Code noise standards. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Development allowed under the GPU could potentially generate temporary, periodic, or permanent sources of groundborne vibration and/or groundborne noise from construction, transportation sources, and other activities. Therefore, it is recommended that an EIR evaluate this topic further.

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

No Impact. The Planning Area does not include an airport land use plan or a public airport. The nearest airports to the Planning Area are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located about three miles west and five miles southwest of the Planning Area, respectively. Therefore, the GPU would not expose people to excessive noise levels from such uses and no impact would occur, and an EIR need not evaluate this topic further.

XIV. POPULATION AND HOUSING

Would the Project:

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

Potentially Significant Impact. The GPU includes revisions to the City's land use plan that would change the potential for direct and indirect population growth and where it occurs within the Planning Area. This could result in substantial unanticipated growth in the planning Area. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The GPU includes no physical changes to the Planning Area that would remove existing housing, rather, it includes provisions for increasing housing that would support City efforts to meet its State-mandated Regional Housing Needs Allocation (RHNA). However, since the GPU includes changes in residential land use designations and policies to encourage new housing, there may be some potential for displacement of existing residents or housing. Therefore, it is recommended that an EIR evaluate this topic further.

XV. PUBLIC SERVICES

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

i. Fire protection?

Potentially Significant Impact. Fire protection and emergency medical services for the Planning Area are provided by the Culver City Fire Department (CCFD) and/or the Los Angeles County Fire Department (LACoFD) for those areas in the SOI. Construction activities associated with the development allowed under the GPU could temporarily increase the demand for fire protection and emergency medical services, and could potentially involve temporary lane closures and construction traffic that slows emergency response in the Planning Area. Growth occurring under the GPU would increase the density and intensity of development in some areas of the Planning Area, with the potential to increase demand for fire protection and emergency medical services from CCFD that could result in the need for new or physically altered facilities. Therefore, it is recommended that an EIR evaluate this topic further.

ii. Police Protection?

Potentially Significant Impact. Police protection services for the Planning Area are provided by the Culver City Police Department (CCPD) and/or Los Angeles County Sheriff Department (County Sheriff) for those areas in the SOI. Construction activities associated with the developments allowed under the GPU could temporarily increase the demand for police protection services to respond to calls associated with theft, graffiti, vandalism and trespassing. Growth occurring under the GPU would increase the density and intensity of development in some areas of the Planning Area with the potential to increase demand for police protection services from CCPD that could result in the need for new or physically altered facilities. Therefore, it is recommended that an EIR evaluate this topic further.

iii. Schools?

Potentially Significant Impact. The Planning Area is served by the Culver City Unified School District. Growth occurring under the GPU could lead to an increase in students that would attend schools within the Planning Area requiring new or altered school facilities. Development allowed under the GPU would be subject to the payment of development fees required by Senate Bill (SB) 50 pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of fees are deemed to provide full and complete mitigation for impacts to school facilities. However, as the GPU will consider long-term plans that may require changes related to plans and policies related to schools, it is recommended that an EIR evaluate this topic further.

iv. Parks?

Potentially Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling about 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. A joint-use partnership between the City and the Culver City Unified School District provides additional open space and park facilities for use by residents of Culver City during non-school hours. Growth occurring under the GPU, and changes in the City land use plan could lead to an increase in demand for parks with the need for new or expanded recreational facilities. Therefore, it is recommended that an EIR evaluate this topic further.

v. Other public facilities?

Potentially Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to the Planning Area. Growth allowed under the GPU and changes in the City land use plan could lead to an increase in other public facility use, such as libraries. Therefore, it is recommended that an EIR evaluate this topic further.

XVI. RECREATION

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

Potentially Significant Impact (a-b). As discussed in Response XV.d, growth occurring under the GPU could lead to an increase in park facility use and deterioration of recreational facilities if new or expanded facilities are not provided. Therefore, it is recommended that an EIR evaluate this topic further.

XVII. TRANSPORTATION

Would the Project:

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

Potentially Significant Impact. The GPU would allow long-term development and redevelopment within the Planning Area with increased trip generation and changes in transportation facilities and policies that could potentially conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The GPU could result in substantial increases in vehicle miles traveled (VMT). As such, it could potentially conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. The GPU includes an update to the Circulation Element, with potential for changes to transportation systems that could result in hazardous conditions. Therefore, it is recommended that an EIR evaluate this topic further.

d. Result in inadequate emergency access?

Potentially Significant Impact. The Planning Area is an established urban area that is well-served by a roadway network. Designated disaster routes within the Planning Area are shown in the County of Los Angeles Disaster Routes With Road Districts map. Changes in land use patterns, circulation plans, and growth occurring under the GPU could affect emergency access within the Planning Area and the adequacy of designated disaster routes. Therefore, it is recommended that an EIR evaluate this topic further.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

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

Senate Bill (SB) 18 incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the Native American Heritage Commission's SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for preserving or mitigation impacts to places, features, and objects described in

Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan.

Ground-disturbing activities associated the development allowed under the GPU, where excavation depths exceed those previously attained or in un-surveyed parcels, could result in impacts to tribal cultural resources as defined in Section 5020.1(k) of the Public Resources Code. Therefore, it is recommended that an EIR evaluate this topic further.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the Project:

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

Potentially Significant Impact. The GPU involves changes in the land use plan that will influence the extent of and where growth occurs in the Planning Area with potential for increases in water use, wastewater generation, stormwater drainage flows, electric power usage, natural gas uses, and telecommunication use. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Buildout under the GPU could result in an increase in water demand within the Planning Area that could exceed available and forecasted water supplies. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Buildout under the GPU could result in an increase in wastewater discharges that would exceed the capacity of existing and planned wastewater treatment, potentially resulting in the need for construction of new or expanded facilities. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste which includes, trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. Private hauling companies collect solid waste generated primarily from large, multi-family residential; commercial; and industrial properties. The City of Culver City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills. Buildout under the GPU would support long-term development and redevelopment within the Planning Area that could generate solid waste that exceeds the existing and planned capacity of landfills serving the City. Therefore, it is recommended that an EIR evaluate this topic further.

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

Potentially Significant Impact. All local governments, including the City, are required under AB 939, the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the local jurisdiction's solid waste exceeds the target, the local jurisdiction would be required to pay fines or face penalties from the State for not complying with AB 939. The waste generated by the developments proposed under the GPU would be incorporated into the City's waste stream, and diversion rates would not be substantially altered. The GPU includes an update to the Parks and Recreation and Public Facilities Element, with potential for changes to City policies related to solid waste that would meet federal, state, and local regulations related to solid waste. Therefore, it is recommended that an EIR evaluate this topic further.

XX. WILDFIRE

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

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

Potentially Significant Impact (a-d). As described in Response IX.g, Cal Fire prepares fire hazard severity maps, including maps that show Fire Hazard Severity Zones (FHSZ), which are areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. According to the Los Angeles County FHSZ map, the eastern portion of the Planning Area is located in a VHFSZ, which includes portions of the Culver Crest neighborhood and Inglewood Oil Field.⁷ Therefore, it is recommended that an EIR evaluate this topic further.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project would have the potential to degrade the quality of the following environmental factors: Air Quality (all but odors), Biological Resources,

⁷ California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>. Accessed October 5, 2021.

Cultural Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. It is recommended that an EIR evaluate Project impacts for the above topics further.

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

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

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

As discussed above, the Planning Area does not have any City or State-designated scenic highways. As such, development allowed under the GPU would not damage scenic resources located within the viewshed of a state scenic highway. Since the GPU's contribution to agricultural and forestry resources would not be cumulatively considerable, cumulative impacts would be less than significant. Given the location of related projects within the city, the GPU's contribution to substantially damaging scenic resources would not be cumulatively considerable and cumulative impacts would be less than significant.

As indicated in the analysis above, the majority of the Planning Area is highly urbanized. No agricultural or forestry uses are located within the Planning Area. In addition, no areas within the Planning Area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program; are zoned for agriculture or forestry use; or under a Williamson Act contract. The same is likely true of related projects given their location within urbanized areas. Even if some of the related projects are exceptions to the above, the Project would not convert farmland, forest land, or designated Farmland; conflict with existing zoning for agricultural or forestry use; or conflict with a Williamson Act contract. As such, the GPU's contribution to agricultural and forestry resources would not be cumulatively considerable and cumulative impacts would be less than significant.

The GPU would have a less than significant impact related to odor emissions. It is anticipated that the related projects would not be major odor-producing uses, like manufacturing, smelting, food packaging, and other industrial uses. Related projects would be need to comply with applicable SCAQMD regulations regarding odor control. By complying with applicable regulatory requirements and site-specific mitigation, the Project's contribution to odor impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

There are no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans in place for the Planning Area. As such, the GPU would have no impact to these plans. Related projects would be required to comply with adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans.

Thus, the GPU impacts on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Impacts related to disturbance of human remains (as part of Cultural Resources) are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, compliance with applicable regulatory protocols would ensure that impacts on human remains would be less than significant. Each related project is expected to comply with existing regulations for approval. Compliance with applicable regulatory requirements by the developments allowed under the GPU and related projects would ensure the Project does not contribute to cumulatively considerable impacts regarding disturbance of human remains.

As analyzed above, the Project would result in less than significant impacts to geology and soils regarding soils supporting septic tanks or alternative waste systems. The GPU is highly urbanized and would connect to existing wastewater infrastructure. Thus, the Project and related projects would not need to use septic tanks or alternative waste disposal systems. As such, no cumulative impacts related to waste disposal capacity would occur.

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

If the Initial Study determines that the Project could have a "Potentially Significant Impact" on a given environmental topic, the Project could also potentially have significant cumulative impacts. Topics with this determination include: Air Quality (all but odors), Biological Resources, Cultural Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. It is recommended that an EIR further evaluate the potential cumulative impacts of the Project on these topics.

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

Potentially Significant Impact. As discussed throughout this Initial Study, the GPU could result in potentially significant environmental impacts on the following environmental topics: Air Quality (all but odors), Biological Resources, Cultural Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. These impacts could have potentially adverse effects on human beings, and it is therefore recommended that an EIR evaluate these topics further.