

General Plan 2045 and Zoning Code Update Project

Draft Environmental Impact Report

State Clearinghouse No. 2022030144

Volume I - DEIR



March 2024



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EXECUTIVE SUMMARY

As the lead agency, the City of Culver City (City) has prepared this Draft Program Environmental Impact Report (Draft PEIR) to provide information about the potential environmental impacts associated with the update to the General Plan, Picture Culver City: General Plan 2045 (General Plan 2045 or General Plan Update) and the associated Zoning Code Update that is necessary to implement the General Plan 2045. The General Plan 2045 and the Zoning Code Update are collectively referred to as the Project. This Draft PEIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) and the City's procedures for implementing CEQA. The principal State CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15168 (Program EIR). The State Clearinghouse Number is 2022030144.

This chapter of the Draft PEIR is prepared pursuant to State CEQA Guidelines Section 15123, which requires that an EIR include a brief summary of the Draft EIR. Per Section 15123, the summary shall contain a brief description of the Project's proposed actions and consequences, including identification of each significant effect and proposed mitigation measures and alternatives that would reduce or avoid those effects, a description of the areas of controversy known to the lead agency, and identification of issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

ES.1 Project Location

Culver City is located in the western area of Los Angeles County. The City comprises about five square miles 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 situated 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.

The General Plan Planning Area includes the city of Culver City and its unincorporated Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the City. The SOI is located to the east of the City boundary in the Baldwin Hills area of Los Angeles County, west of La Cienega Boulevard.

ES.2 Project Description

The Project is the adoption and implementation of a comprehensive update to the Culver City General Plan and amendments to the Zoning Code to implement the General Plan 2045. The General Plan 2045 would provide a framework and vision to guide growth and development within the Planning Area, which includes the City’s jurisdictional boundaries and its SOI, through the planning horizon year of 2045. Together with the Zoning Code Update, the General Plan 2045 would serve as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council.

By law, a general plan must be an integrated, internally consistent statement of City policies. Government Code Section 65302 requires that a general plan include the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Senate Bill (SB) 1000 and Government Code Section 65302 require that since disadvantaged communities have been identified within the City, the Plan must also address Environmental Justice either as a standalone element or integrating related goals, policies, and objectives throughout other elements. The General Plan 2045 includes a Community Health and Environmental Justice element. Additional elements may be included as well, at the discretion of the City. The General Plan 2045 includes the following elements: Land Use and Community Design; Mobility; Conservation; Noise; Safety; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction, Infrastructure, Community Health and Environmental Justice; Economic Development; Arts, Culture, and Creative Economy; and Governance and Leadership. (The 2021-2029 Housing Element was adopted in August 2022.)

ES.3 Issues Raised during Notice of Preparation Process and Areas of Controversy

Section 15123 of the State CEQA Guidelines states that an PEIR shall identify areas of controversy known to the lead agency, including issues raised by the agency and the public during the scoping process.

The City received comment letters from public agencies and the public during public review period in response to the Notice of Preparation of an Environmental Impact Report (NOP) and the Recirculated NOP. In addition, verbal comments were received at the Scoping Meetings held on March 24, 2022 and March 7, 2024. The NOP comments are contained in Appendix A-3 of this PEIR.

In general, the comments raised the following potential environmental issues or concerns: transportation, including transit, walkability, access, and vehicle miles travelled (VMT); air quality; greenhouse gas emissions; biological resources; cultural and tribal cultural resources; geologic hazards; hazardous materials; public utilities and services; and ocean breezes.

ES.4 Significant and Unavoidable Environmental Impacts

State CEQA Guidelines Section 15126 requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. As indicated in Chapter 4, *Environmental Impact Analysis*, of this Draft PEIR, the Project would result in significant unavoidable impacts associated with air quality, cultural resources (historical resources), noise, and transportation (VMT), which are discussed in more detail below and are summarized in Chapter 6, *Other CEQA Considerations*.

Air Quality

The Project would result in a potentially significant impact related to a conflict with or obstruction of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

The Project would result in a potentially significant impact related to a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

The Project would result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. While implementation of mitigation would help to reduce the severity of the effects, the impacts would remain significant and unavoidable.

Cultural Resources

The Project could cause a substantial adverse change in the significance of a historical resource pursuant CEQA Guidelines Section 15064.5 as it is reasonable to assume that some historical resources would be demolished or altered in an adverse manner over the lifetime of the General Plan 2045. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

In addition, future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of historical resources, thus resulting in a potentially significant cumulative impact. Even with implementation of proposed General Plan 2045 policies, as well as applicable local, state, and federal laws and MM CUL-1, the Project's contribution to this potentially significant cumulative impact would be cumulatively considerable.

Noise

The Project would result in a potentially significant impact, as construction noise and traffic noise generated during the construction and operation of future development projects could exceed the significance thresholds. While implementation of mitigation would help to reduce the severity of noise during construction, the impacts during this phase would remain significant and unavoidable; no feasible mitigation is available to reduce the severity of traffic noise during operation, and thus impacts during this phase would continue to be significant and unavoidable.

The Project would result in a potentially significant impact, as vibration generated during the construction of future development projects could exceed the significance thresholds. While implementation of mitigation would reduce the severity of vibration during construction, the impact during this phase would remain significant and unavoidable.

In addition, the Project's contribution to cumulative construction and operational noise and vibration impacts would be cumulatively considerable.

Transportation

The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) in that the average daily VMT per Capita, Daily VMT per Employee, and total VMT per service population generated by the Project would exceed 15 percent below the corresponding City Baseline. As no feasible mitigation is available, the impact would continue to be significant and unavoidable.

ES.5 Summary of Project Alternatives

CEQA Guidelines section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives but avoid or substantially lessen any identified significant adverse environmental effects of the project. An EIR is not required to consider every conceivable alternative to a project or alternatives that are infeasible. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

Chapter 5, *Alternatives*, of this Draft PEIR presents the alternatives analysis as required by CEQA for the Project. The discussion includes the methodology used to select alternatives to the Project for detailed CEQA analysis, with the intent of developing potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified while still meeting most of the Project's basic objectives. Based on the screening process, the following alternatives were selected for detailed analysis in this Draft PEIR:

- Alternative 1 – No Project Alternative
- Alternative 2 – Concentrated Growth Alternative
- Alternative 3 – Modified Mixed Use High Designation

Detailed descriptions of the alternatives are presented below. Their associated environmental impacts are discussed further in Chapter 5, *Alternatives*.

Alternative 1 – No Project Alternative

Consistent with Section 15126.6(e)(2) of the State CEQA Guidelines, the No Project Alternative represents what would be reasonably expected to occur in the foreseeable future if the Project were not adopted and the City's current General Plan and Zoning Code remain in effect. Future development under Alternative 1, the No Project Alternative, would be the continuation of growth in the city guided by the City's adopted 1996 General Plan and the current Zoning Code.

Under the No Project Alternative, the current land use designations in the adopted General Plan as amended to date and existing goals and policies would remain in place. Future development in the Planning Area would continue to be subject to existing policies, regulations, development standards, and land use designations of the adopted General Plan. No amendments would occur to areas identified for change under the Project. Policies concerning topics such as transportation, economic development, parks, open space, the environment, climate change, environmental justice, health, and housing would also remain unchanged.

Specifically, since no new land use or zoning designations would be created under this alternative, the City would not comprehensively update its Land Use Element or Land Use Map to increase densities or intensities across the city. Without increasing the residential densities within the city, the City would not be able to fully meet its current and future RHNA allocations through 2045.¹ In addition, under this alternative, the City would have to continue to process General Plan and zoning amendments on a project-by-project basis for projects that conflict with the existing 1996 General Plan, which results in land use changes at the parcel level instead of being comprehensively updated through the planning process for the General Plan.

The 1996 General Plan projected approximately 41,330 residents and approximately 56,743 jobs by the planning horizon of 2010.² Since the planning horizon of 2010 has passed, the No Project Alternative growth projections are based on the socio-economic data (SED) assumptions from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG developed demographic and economic forecasts of population, households, and employment at the regional and county levels and then incorporated local land use data and existing housing and employment data to allocate growth at the jurisdiction (e.g., city) and Transportation Analysis Zone (TAZ) levels. SCAG worked with the individual jurisdictions during this process to ensure accurate projections for each jurisdiction using their current General Plans and land use maps. The SCAG 2045 forecast for Culver City is a population of 41,546 residents with a total of 18,017 households and 64,041 jobs.

Alternative 2 – Concentrated Growth Alternative

Alternative 2, the Concentrated Growth Alternative, would be similar to the Project but would result in a different land use distribution strategy than the Project. Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. Therefore, under Alternative 2, the goals, policies, and

¹ City of Culver City Housing, October 2021-2029, Appendix B, Table B-5.

² Note that the existing 1996 General Plan does not project households.

implementation actions contained within the proposed General Plan elements would be applicable. Alternative 2 also includes all of the mobility improvements as proposed for the Project throughout the planning horizon of 2045. As with the Project, a Zoning Code Update for Alternative 2 would provide the development standards to implement the General Plan 2045.

The Concentrated Growth Alternative is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project.

Figure 5-1, *Land Use Alternatives Conceptual Comparison*, illustrates the conceptual land use plan for Alternative 2. The overall land use pattern under Alternative 2 would be similar to that for the Project. Alternative 2 would result in the activation and concentration of new mixed-use growth along commercial corridors and in existing non-residential districts in combination with moderate densification across the Planning Area. Specifically, commercial corridors in the city, such as Washington Boulevard and Sepulveda Boulevard, would be upzoned to allow for higher densities. For example, more area in Fox Hills would be designated as Mixed Use High (MUH) thereby allowing more density in the area. In addition, areas along Sepulveda Boulevard that are designated Mixed Use Corridor 2 (MUC 2) under the Project would be designated Mixed Use Medium (MUM) thereby allowing greater density along the corridor. Areas along Jefferson under Alternative 2 would have less Industrial Mixed Use on Jefferson compared with the Project. Under Alternative 2 along Washington Boulevard in the southern portion of the city would be Mixed Use Corridor 2, allowing greater density compared with the Project.

In addition, as with the Project, Alternative 2 identified opportunity sites. Most properties fronting major corridors, such as Jefferson, Sepulveda, Washington, and Culver Boulevards, as well as all non-residential portions of Fox Hills were considered as opportunity sites. Compared to the Project, the opportunity sites under the Concentrated Growth Alternative would result in greater residential densities and non-residential intensities along the corridors. Implementation of this alternative could result in greater amounts of mixed-use development throughout the city on corridors compared to the Project.

Alternative 3 – Modified Mixed Use High Designation

Alternative 3, the Modified Mixed Use High Designation Alternative, would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. The Modified Mixed Use High Designation Alternative is projected to result in approximately 61,170 residents, 27,340 housing units, and 84,090 jobs in Culver City by 2045. Thus, Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project.

Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. The overall land use pattern under Alternative 3 would be similar to that for the Project. As with the Project, Alternative 3 would accommodate growth through infill development and redevelopment with growth occurring along corridors. Alternative 3 would incorporate mixed-use development on

opportunity sites and in the industrial areas. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum floor area ratio (FAR) would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. In addition, with the reduction of residences there would be a reduction in the amount of incidental commercial floor area, thereby resulting in the reduction of approximately 210 jobs compared with the Project.

Under Alternative 3, the goals, policies, and implementation actions contained within the proposed General Plan elements would be applicable. Alternative 3 would include all of the mobility improvements as proposed for the Project throughout the planning horizon of 2045. As with the Project, a Zoning Code Update for Alternative 3 would provide the development standards to implement the General Plan 2045.

ES.6 Summary of Environmental Impacts

Pursuant to Section 15123(b)(1) of the State CEQA Guidelines, **Table ES-1, Summary of Project Impacts and Mitigation Measures**, briefly describes the Project impacts and the mitigation measures recommended to eliminate or reduce the impacts. The residual impact after mitigation is also identified. Detailed discussions of each of the identified impacts and mitigation measures, including pertinent support data, can be found in the specific topic sections in Chapter 4, *Environmental Impact Analysis*, of this Draft PEIR.

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES**

Environmental Impacts	Mitigation Measures	Level of Significance
4.1 Aesthetics		
<p>Scenic Vistas (Impact AES-1): While there are no designated scenic vistas in the Planning Area, there are long-range views and view corridors which could be impacted during construction and operation of future development that would occur under the Project. However, future development would be required to comply with the goals and policies of the General Plan 2045 that protect scenic vistas as well as with all applicable laws, regulations, and standards related to scenic vistas. Therefore, impacts related to a substantial adverse effect on a scenic vista would be less than significant.</p>	N/A	Less than Significant
<p>Scenic Quality (Impact AES-2): The Project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant.</p>	N/A	Less than significant
<p>Light and Glare (Impact AES-3): The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant.</p>	N/A	Less than significant
4.2 Air Quality		
<p>Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable.</p>	Implement MM AQ-1 through MM AQ-5	Significant and Unavoidable
<p>Criteria Pollutants (Impact AIR-2): The Project would result in a potentially significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable.</p>	<p>MM AQ-1: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of NOX, CO, PM10 and/or PM2.5 shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less</p>	Significant and Unavoidable

Environmental Impacts	Mitigation Measures	Level of Significance
	<p>than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations. Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.</p>	
	<p>MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super-Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.</p>	
	<p>MM AQ-3: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, show on the building plans that all major appliances (dishwashers, refrigerators, clothes washers, and dryers) to be provided/installed are Energy Star-certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star or equivalent appliances shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p>	

Environmental Impacts	Mitigation Measures	Level of Significance
	<p>MM AQ-4: Applicants for new residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the feature below has been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> • For multifamily dwellings, electric vehicle charging shall be provided as specified in Section A4.106.8.2 (Residential Voluntary Measures) of the CALGreen Code (or its successor code). 	
	<p>MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> • Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). • Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). 	

Environmental Impacts	Mitigation Measures	Level of Significance
<p>Substantial Pollutant Concentrations (Impact AIR-3): The Project would result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. Implementation of mitigation measures would help to reduce the severity of the impacts. However, impacts would remain significant and unavoidable.</p>	<p>Implement MM AQ-1 and MM AQ-3</p> <p>MM AQ-6: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.</p> <p>MM AQ-7: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential health risk impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing health risk impacts. If health risk impacts are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.</p>	<p>Significant and Unavoidable</p>
<p>4.3 Biological Resources</p>		
<p>Candidate, Sensitive, or Special Status Species (Impact BIO-1): The Project has the potential to impact existing habitats and associated special-status species within the Planning Area during construction and operation of future development. However, with implementation of Mitigation Measures BIO-1 and BIO-2, the Project would result in less than significant impacts related to special-status species.</p>	<p>MM BIO-1: Baseline Biological Assessment. The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well</p>	<p>Less than Significant with Mitigation</p>

Environmental Impacts	Mitigation Measures	Level of Significance
	<p>as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:</p> <ul style="list-style-type: none"> a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, § 15125(c)]. b. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018); c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions; d. A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, § 15380); and, e. Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance. f. Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes. g. Avoidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented. 	

Environmental Impacts	Mitigation Measures	Level of Significance
	<p>MM BIO-2: Nesting Bird Surveys. Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p>	
<p>Riparian Habitat or Sensitive Natural Habitat (Impact BIO-2): The Project would have no adverse effect on any riparian habitat or sensitive natural community due to the lack of any such habitat within the Planning Area.</p>	N/A	No Impact
<p>State or Federally Protected Wetlands (Impact BIO-3): The Project would not have a substantial adverse effect on state or federally protected wetlands or waters. Project impacts would be less than significant.</p>	N/A	Less than Significant
<p>Wildlife Corridors or Wildlife Nursery Sites (Impact BIO-4): The Project would not substantially interfere with movement of native resident or migratory fish or wildlife species or with established wildlife corridors due to the lack of wildlife movement corridors within the Planning Area. In addition, the Project would not impede the use of wildlife nursery sites with implementation of Mitigation Measure MM BIO-2 for migratory birds. Therefore, Project impacts would be less than significant with mitigation incorporated.</p>	MM BIO-2	Less than Significant with Mitigation
<p>Tree Preservation Policy or Ordinance (Impact BIO-5): The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, within the Planning Area. Therefore, impacts would be less than significant.</p>	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
4.4 Cultural Resources		
<p>Historical Resources (Impact CUL-1): The Project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, even with implementation of Mitigation Measure MM CUL-1, impacts would remain significant and unavoidable.</p>	<p>MM CUL-1: Prior to development of any project within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior’s Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified historic resources will be assessed for the project’s potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be evaluated for its potential significance under national and state criteria prior to the City’s approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.</p>	<p>Significant and Unavoidable</p>
<p>Archaeological Resources (Impact CUL-2): Project-related demolition, construction, maintenance, and/or improvement activities would have the potential to cause a potentially significant impact to archaeological resources. Implementation of Mitigation Measure MM CUL-2, standard conditions of approval, and applicable policies in the General Plan 2045 would reduce impacts to archaeological resources to a less than significant level.</p>	<p>MM CUL-2: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project’s potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city’s approval of project plans and publication of subsequent CEQA documents.</p>	<p>Less than Significant with Mitigation</p>

Environmental Impacts	Mitigation Measures	Level of Significance
4.5 Energy		
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources (Impact ENG-1): The Project would result in a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during construction and/or operation.	N/A	Less than Significant
Conflict with State or Local Renewable Energy Plan (Impact ENG-2): The Project would result in a less than significant impact related to conflicting or obstructing a state or local plan for renewable energy or energy efficiency during construction and/or operation.	N/A	Less than Significant
4.6 Geology and Soils		
Geologic Hazards (Impact GEO-1): The Project would accommodate growth and development within areas potentially subject to surface rupture within an Alquist-Priolo fault zone, strong seismic shaking, seismic-related ground failure and landslides. However, implementation of the Project would include goals and policies that require adherence to all applicable laws, regulations, and standards related to seismic hazards and would require site-specific geotechnical investigations to address localized geologic hazards. Therefore, impacts would be less than significant.	N/A	Less than Significant
Soil Erosion or Loss of Topsoil (Impact GEO-2): The Project would not result in substantial soil erosion or the loss of topsoil. Therefore, impacts related to soil erosion or loss of topsoil would be less than significant.	N/A	Less than Significant
Unstable Soils (Impact GEO-3): While some future development under the Project could be located on a geologic unit or soil that is unstable or could become unstable, consistency with all applicable geotechnical and engineering regulations in the CBC and CMCC as well as with the goals and policies of the General Plan 2045 would minimize risks associated with on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable soils would be considered less than significant.	N/A	Less than Significant
Expansive Soils (Impact GEO-4): While some future development under the Project could be located on expansive soils, compliance with all applicable geotechnical and engineering regulations in the CBC and CMCC as well as consistency with the goals and policies of the General Plan 2045 would minimize risks associated with expansive soils or subsidence. Therefore, impacts related to expansive soils would be considered less than significant.	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
<p>Paleontological Resources (Impact GEO-5): Specific project-related demolition, construction, maintenance, and/or improvement activities would have the potential to cause a potentially significant impact to paleontological resources. Implementation of Mitigation Measure MM GEO-1 and applicable policies in the General Plan 2045 would reduce impacts to paleontological resources to a less than significant level.</p>	<p>MM GEO-1: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.</p>	<p>Less than Significant with Mitigation</p>
<p>4.7 Greenhouse Gas</p>		
<p>Generate GHG Emissions (Impact GHG-1): The Project would result in a less than significant impact related to GHG emissions.</p>	<p>N/A</p>	<p>Less than Significant</p>
<p>Conflict with GHG Reduction Plan, Policy, or Regulation (Impact GHG-2): The Project would result in a less than significant impact related to conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.</p>	<p>N/A</p>	<p>Less than Significant</p>
<p>4.8 Hazards and Hazardous Materials</p>		
<p>Routine Use, Transportation, and Disposal of Hazardous Materials (Impact HAZ-1): The Project would be required to comply with requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. Therefore, the Project would result in a less than significant impact related to the routine use, transport, or disposal of hazardous materials.</p>	<p>N/A</p>	<p>Less than Significant</p>

Environmental Impacts	Mitigation Measures	Level of Significance
<p>Accident and Upset Conditions (Impact HAZ-2): The Project would be required to comply with State law and implement federal, State, and local General Plan 2045 policies during construction activities, which would ensure that future development allowed under the General Plan 2045 would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. Therefore, the Project would result in a less than significant impact related to accident and upset conditions.</p>	N/A	Less than Significant
<p>Emit Hazardous Materials Within One-Quarter Mile of a School (Impact HAZ-3): The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one-quarter mile of a school.</p>	N/A	Less than Significant
<p>Hazardous Materials Sites (Impact HAZ-4): The Project would be required to comply with requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD, which would ensure that future development on a contaminated site does not create a significant hazard to the public or the environment. Therefore, the Project would result in a less than significant impact related to hazardous materials sites.</p>	N/A	Less than Significant
<p>Impairment or Interference with Emergency Response Plan (Impact HAZ-5): The Project would not interfere with implementation of the Culver City MJHMP or operations of CCFD, LACFD, CCPD, LACSD, or other agencies that would respond in the event of a disaster or major emergency in Culver City. Therefore, the Project would result in a less than significant impact related to impairment or interference with an emergency response plan.</p>	N/A	Less than Significant
<p>Wildland Fire Hazards (Impact HAZ-6): The Project would be required to adhere to building codes and review by CCFD to reduce fire hazards, which would ensure that people or structures are not exposed, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the Project would result in a less than significant impact related to wildland fire hazards.</p>	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
4.9 Hydrology and Water Quality		
<p>Violate Water Quality Standards or Waste Discharge Requirements (Impact HYD-1): The Project would contain goals and policies to protect water quality. Construction and operation of future development that would occur under the Project would be required to comply with all applicable laws, regulations, and standards related to water quality and waste discharge. Therefore, the Project would result in less than significant impacts related to violating water quality standards or waste discharge requirements.</p>	N/A	Less than Significant
<p>Groundwater Supplies and Groundwater Recharge (Impact HYD-2): The Project would not deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the Project would result in less than significant impacts related to groundwater supplies, the groundwater table level, and aquifer volumes.</p>	N/A	Less than Significant
<p>Substantially Alter Drainage Patterns (Impact HYD-3): The Project would not substantially alter the existing drainage pattern of the Planning Area in a manner that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows. Therefore, impacts related to drainage patterns would be less than significant.</p>	N/A	Less than Significant
<p>Release of Pollutant From Inundation by Flood, Tsunami, or Seiche (Impact HYD-4): The risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area; therefore, impacts related to the risk of release of pollutants due to inundation from a flood, tsunami, or seiche would be less than significant.</p>	N/A	Less than Significant
<p>Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan (Impact HYD-5): The Project would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.</p>	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
4.10 Land Use and Planning		
Physically Divide a Community (Impact LU-1): The Project would not physically divide an established community. Therefore, the Project would result in a less than significant impact.	N/A	Less than Significant
Consistency with Applicable Land Use Plans (Impact LU-2): The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would result in a less than significant impact.	N/A	Less than Significant
4.11 Mineral Resources		
Known Mineral Resource, Locally-Important Mineral Resource Recovery Site (Impacts MIN-1 and MIN-2): Since the Planning Area is not within an identified MRZ for significant mineral resources, future growth resulting from implementation of the Project would not impact regionally important aggregate material resources. In addition, the Project would not change the land use designation resulting in future development within the City's portion of the IOF and thus, would not result in the loss of the regionally- or locally-important oil and gas resources. Therefore, impacts to mineral resources would be less than significant.	N/A	Less than Significant
4.12 Noise		
Temporary or Permanent Increase in Ambient Noise Levels (Impact NOI-1): The Project would result in a potentially significant impact during construction and operation of future development projects that could exceed the significance thresholds. Implementation of mitigation would help to reduce the severity of the impacts; however, impacts could still exceed the significance thresholds and impacts would be significant and unavoidable.	MM NOI-1: Construction Noise. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project: <ul style="list-style-type: none"> • Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors. • Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT). • Limit non-essential idling of construction equipment to no more than five minutes per hour. 	Significant and Unavoidable

Environmental Impacts	Mitigation Measures	Level of Significance
	<p>This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.</p>	
<p>Excessive Groundborne Vibration or Groundborne Noise (Impact NOI-2): The Project would result in a potentially significant impact during construction of future development projects that could exceed the significance thresholds. While implementation of mitigation measures would reduce the severity of the impacts, impacts could still exceed the significance thresholds. Thus, groundborne vibration or groundborne noise during construction would be significant and unavoidable. The Project would result in a less than significant impact related to excessive groundborne vibration or groundborne noise during operation of future development projects.</p>	<p>MM NOI-2: Construction Vibration. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.</p> <p>Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:</p> <ul style="list-style-type: none"> • Jackhammer: 23 feet. • Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet. • Roller (for site ground compaction or paving): 75 feet. • Impact pile-driving: 280 feet. <p>This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.</p>	<p>Significant and Unavoidable</p>

Environmental Impacts	Mitigation Measures	Level of Significance
4.13 Population and Housing		
Induce Unplanned Population Growth (Impact POP-1): The Project would accommodate regional growth in an orderly manner for the next 25 years and would result in a less significant impact related to inducing unplanned population growth.	N/A	Less than Significant
Require Construction of New Housing (Impact POP-2): The Project would increase the overall number of dwelling units in the city as well as include policies that seek to ensure equity and protect diversity in Culver City's communities and would therefore, result in a less than significant impact related to requiring construction of new housing as a result of displacing substantial numbers of existing people or housing.	N/A	Less than Significant
4.14 Public Services		
Fire Protection (Impact PS-1.i): The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities as new facilities would be required to comply with existing regulations and Project policies, the concentration of new development would be in areas already well-served by fire protection services, and the Project includes additional policies to reduce fire hazards in the city. Therefore, the Project would result in a less than significant impact related to fire protection facilities.	N/A	Less than Significant
Police Protection (Impact PS-1.ii): The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities as new facilities would be required to comply with existing regulations and Project policies, the concentration of new development would be in areas already well-served by police protection services, and the Project includes additional policies to address crime potential in the city. Therefore, the Project would result in a less than significant impact related to police protection facilities.	N/A	Less than Significant
Schools (Impact PS-1.iii): The Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and school capacity. However, payment of school impact fees would fully mitigate the impacts of development on school facilities for purposes of CEQA per SB 50. In addition, implementation of CCUSD's updated Future-Ready Facilities Plan would ensure that there is sufficient capacity to accommodate future public-school students. Therefore, the Project would result in a less than significant impact related to schools.	N/A	Less than Significant
Other Public Facilities (Impact PS-1.iv): The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities as new or expanded facilities would be required to comply with existing regulations and Project policies. Therefore, the Project would result in a less than significant impact related to other public facilities.	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
4.15 Recreation		
<p>Deterioration of Existing Recreational Facilities (Impact REC-1): The Project would not 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 and would therefore, result in a less than significant impact related to deterioration of existing recreational facilities.</p>	N/A	Less than Significant
<p>Construction or Expansion of Recreational Facilities (Impact REC-2): The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the Project would result in a less than significant impact.</p>	N/A	Less than Significant
4.16 Transportation		
<p>Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy (Impact TR-1): The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact would be less than significant.</p>	N/A	Less than Significant
<p>Conflict with CEQA Guideline Section 15064.3, Subdivision (b) (Impact TR-2): The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). As there are no feasible mitigation measures, the impact would be significant and unavoidable.</p>	No feasible mitigation measures	Significant and Unavoidable
<p>Incompatible Uses (Impact TR-3): The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) and impacts would be less than significant.</p>	N/A	Less than Significant
<p>Inadequate Emergency Access (Impact TR-4): The Project would not result in inadequate emergency access and impacts would be less than significant.</p>	N/A	Less than Significant
4.17 Tribal Cultural Resources		
<p>Tribal Cultural Resource Significance (Impact TCR-1): The Project would not cause a substantial adverse change in the significance of tribal cultural resources as all future projects would be required to comply with the provisions of SB 18 and AB 52 to incorporate tribal consultation into the CEQA process, which would ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Therefore, impacts would be less than significant.</p>	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
4.18 Utilities and Service Systems		
New or Expanded Utility Infrastructure (Impact UTL-1): While the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, and stormwater drainage facilities, future development under the Project could require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities. However, the construction or relocation of these facilities would not cause significant environmental effects. Therefore, impacts would be less than significant.	N/A	Less than Significant
Water Supplies (Impact UTL-2): Sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, single dry, and multiple dry years would not be available. Therefore, the Project would result in potentially significant impact related to water supplies.	N/A	Less than Significant
Wastewater Treatment (Impact UTL-3): The existing wastewater treatment facilities serving the Project would have sufficient capacity to treat the projected wastewater demand generated by the Project. Therefore, the Project would result in a less than significant impact related to wastewater treatment.	N/A	Less than Significant
Solid Waste (Impact UTL-4): The amount of solid waste generated by the Project would not exceed the remaining capacity of existing County landfills and would not impair the attainment of solid waste reduction goals. Therefore, the Project would result in a less than significant impact related to solid waste generation.	N/A	Less than Significant
Solid Waste Regulations (Impact UTL-5): The Project would comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste and therefore, impacts would be less than significant impact.	N/A	Less than Significant
4.19 Wildfire		
Emergency Response or Evacuation Plans (Impact WF-1): The Project would not substantially impair an adopted emergency response or evacuation plan as development facilitated under the Project would be required to comply with all applicable regulations, plans, and policies related to emergency response plan or emergency evacuation plan. Therefore, the Project would result in a less than significant impact related to emergency response or evacuation plans.	N/A	Less than Significant
Exacerbate Wildfire Risks (Impact WF-2): Future development that would occur as a result of the Project would be required to comply with applicable regulations, plans, and policies in place to reduce the risks associated with wildland fires. Therefore, the Project would result in a less than significant impact related to exacerbating wildfire risks.	N/A	Less than Significant

Environmental Impacts	Mitigation Measures	Level of Significance
<p>Installation or Maintenance of Associated Infrastructure Which Exacerbate Fire Risk (Impact WF-3): Future development allowed under the Project would occur in urbanized and developed areas where existing infrastructure is already in place. In addition, future development allowed under the Project would be reviewed by CCFD as part of the development review process to ensure project compliance with CFC, CBC, and the General Plan and Zoning Code Updates. Therefore, the Project would result in a less than significant impact related to the installation or maintenance of associated infrastructure that could exacerbate fire risk.</p>	<p>N/A</p>	<p>Less than Significant</p>
<p>Expose People or Structures to Significant Risks (Impact WF-4): Future development allowed under the Project would be subject to the applicable regulations and requirements of the City's Municipal Code as well as policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that the Project would not 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. Therefore, impacts would be less than significant.</p>	<p>N/A</p>	<p>Less than Significant</p>

CHAPTER 1

Introduction

This Draft Program Environmental Impact Report (PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts of the proposed update to the General Plan, Picture Culver City: General Plan 2045 (General Plan 2045 or General Plan Update) and the associated Zoning Code Update that is necessary to implement the General Plan 2045. The General Plan 2045 and the Zoning Code Update are collectively referred to as the Project. This chapter outlines the purpose and overall approach to the preparation of the Draft PEIR. The City of Culver City (City) is the lead agency responsible for ensuring that the Project complies with CEQA. “Lead agency” is defined by Section 21067 of the State *CEQA Guidelines* as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment”.

1.1 Purpose of the Draft EIR

The primary intent of CEQA is to ensure that public agency decision-makers document and consider the environmental implications of their actions in order to avoid or minimize environmental damage that could result from the implementation of a project wherever feasible, and to balance environmental, economic, and social objectives. In accordance with Section 15121 of the CEQA Guidelines, the purpose of an EIR is to serve as an informational document that:

“...will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

The purpose of this Draft PEIR is to inform decision-makers and the general public of the potential programmatic environmental impacts resulting from the Project. The City is the Lead Agency under CEQA and is responsible for preparing this Draft PEIR. This Draft PEIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) and the City’s procedures for implementing CEQA. The principal State CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15168 (Program EIR). This Draft PEIR serves the following purposes:

- To satisfy CEQA requirements for analysis of environmental impacts by including a complete and comprehensive programmatic evaluation of the physical impacts of adopting and implementing the Project;

- To recommend a set of measures to mitigate any significant adverse impacts;
- To analyze a range of reasonable alternatives to the Project;
- To inform decision-makers and the public of the potential environmental impacts of the Project prior to taking action on the Project, and to assist City officials in reviewing and adopting the General Plan 2045 and Zoning Code Update; and
- To provide a basis for the review of subsequent development projects and public improvements proposed within the Planning Area. Subsequent environmental documents may be tiered from the PEIR.

The Project consists of policies, diagrams, and standards to guide land use and development decisions for the City, as described in greater detail in Chapter 2, *Project Description*. Chapter 4, *Environmental Impact Analysis*, of this Draft PEIR contains analysis of all potential environmental impacts expected to result from implementation of the policies and programs provided in the 2045 General Plan Update and the standards and specifications provided in the Zoning Code Update, including those policies that serve to avoid or minimize potentially adverse environmental impacts. In accordance with CEQA requirements, the Draft PEIR also identifies and evaluates mitigation measures in an effort to mitigate potentially significant impacts where feasible. Chapter 5, *Alternatives*, of this Draft PEIR contains an analysis of alternatives to the Project, including an analysis of the No Project Alternative, which represents the continued implementation of the current General Plan. An environmentally superior alternative has also been identified as part of the alternatives analysis.

1.2 Type of EIR

A program EIR is defined in Section 15168 of the CEQA Guidelines as “An EIR addressing a series of actions that can be characterized as one large project and are related either: (1) Geographically; (2) As logical parts in the chain of contemplated actions; (3) In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways”.

Program EIRs can be used as the basic, general environmental assessment from an overall program of future projects, policies, and related implementation actions, such as the Project, intended to be developed or implemented over a 20-year planning horizon. A program EIR has several advantages. First, it provides a basic reference document to avoid unnecessary repetition of facts or analysis in subsequent project-specific assessments. Second, it allows the lead agency to look at the broad, regional impacts of a program of actions before its adoption and eliminates the redundant or contradictory approaches to the consideration of regional and cumulative effects.

As a programmatic document, this Draft PEIR presents an assessment of the potential impacts of the Project across the Planning Area, which includes implementation of the General Plan 2045 and Zoning Code Update through the year 2045. It does not evaluate project-specific impacts of

potential future developments that may be proposed by either the City or other entities consistent with the vision of the Project, all of which would be required to comply with CEQA and/or National Environmental Policy Act (NEPA), as applicable.

The preparation of this program-level document does not relieve the sponsors of future development from the responsibility of complying with the requirements of CEQA (and/or NEPA for projects requiring federal funding or approvals). As noted, individual discretionary projects are required to prepare a more precise, project-level analysis to fulfill CEQA and/or NEPA requirements as applicable. The lead agency responsible for reviewing these projects shall determine the level of review needed, and the scope of that analysis will depend on the specifics of the particular project. Pursuant to CEQA Guidelines Section 15152 (Tiering), these projects may, however, use the discussion of impacts in this PEIR as a basis for their assessment of these regional, citywide, or cumulative impacts, provided that the projects are consistent with the General Plan 2045 and the data and assumptions used in this PEIR remain current and valid.

In accordance with Section 15121 of the State CEQA Guidelines, this Draft PEIR provides information regarding the potential environmental effects associated with the implementation of the General Plan 2045 and Zoning Code Update and ways to minimize any significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with Section 15093 of the State CEQA Guidelines, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final PEIR and any other information in the public record for the project. This is known as a “statement of overriding considerations.”

This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the Project, as required under Section 15146 of the State CEQA Guidelines. The analyses focus on the secondary effects that can be expected to follow adoption of the General Plan 2045 and Zoning Code Update, but will not be as detailed as the analysis required for future specific development projects that may follow. This Draft PEIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

1.3 Intended Uses of the PEIR

Section 15124(d) of the CEQA Guidelines require EIRs to identify the agencies that are expected to use the EIR in their decision-making, and the approvals for which the EIR will be used. This PEIR will inform the City, in addition to other responsible agencies, persons, and the general public, of the potential environmental effects of the Project and the identified alternatives. The City will use the PEIR as part of its review and approval of the proposed 2045 General Plan Update and Zoning Code Update. The City would review subsequent discretionary implementation projects for consistency with the PEIR and prepare appropriate environmental

documentation pursuant to CEQA provisions for PEIRs and subsequent projects. Subsequent projects under the PEIR may include the following implementation activities: Specific Plans; Development Plans including tentative maps, variances, conditional use permits, and other land use permits; Facility and Service Master Plans, Funding of Public Improvement Projects, Development Agreements, and other permits and approvals necessary for implementation of the Project or other public and private development projects.

This program-level EIR does not evaluate the project-specific impacts of individual developments that may be allowed under the Project. Pursuant to CEQA Section 15152, subsequent projects that are consistent with the General Plan 2045 may “tier” from this PEIR, relying on the environmental analysis and mitigation measures it contains in order to streamline environmental review or to focus on project-specific environmental effects not considered in this Program EIR, if any. Additionally, subsequent projects that satisfy the requirements of CEQA Section 15182 or 15183 may be eligible for streamlined environmental review.

This PEIR serves as the environmental document for all discretionary actions associated with adoption of the General Plan 2045 and Zoning Code Update. This PEIR is intended to be the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the Project. This PEIR is also intended to assist other responsible agencies in granting approvals that may be required for implementation of the Project. Federal, State, regional, and local government agencies that may have jurisdiction over development proposals in the Planning Area include the City of Culver City, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, California Department of Conservation, California Department of Housing and Community Development, California Department of Transportation, State Lands Commission, State Water Resources Control Board, Southern California Association of Governments, South Coast Air Quality Management District, Metropolitan Water District of Southern California, Sanitation Districts of Los Angeles County, County of Los Angeles, Los Angeles Metropolitan Transit Authority, Culver City Unified School District, and the Los Angeles Department of Water and Power.

1.4 EIR Scoping Process

1.4.1 Background

The City initiated the General Plan 2045 process in 2019 with a series of community outreach events and launch of the project website (pictureculvercity.com). Since that time, City staff and the planning consulting team have completed studies, evaluations, and community outreach events, information on which is available on the project website.

The planning process has been guided by a General Plan Advisory Committee (GPAC), established in 2018, with several meetings of the Planning Commission and the City Council at key stages. The GPAC has 21 members appointed by City Council. Its primary roles are to provide insight to the project team on how to address key issues and understand sensitive community needs; review and provide comments on General Plan 2045 work products; and inform the community of the process and help to build community support for and engagement with the General Plan 2045 process. Along with the GPAC, a series of topic-specific technical advisory

committees (TACs) are exploring innovative ideas and topics for the General Plan 2045. These informal TACs cover topics, such as housing; transportation and mobility; quality of life issues, such as sustainability, health, and parks; culture and arts; economic development; and policing and public safety. TAC members are volunteer positions and all who expressed interest were included on one of the TACs in Fall 2020.

The General Plan 2045 process has gone through multiple steps to culminate into the current draft plan, including:

- **Existing Conditions.** Review existing policies and reports, identify issues and opportunities.
- **Listening and Visioning.** Develop long-term vision and guiding principles via stakeholder meetings, meetings with City bodies, stakeholder interviews, engagement with the GPAC, engagement with TACs, community workshops, online engagement and surveys, and tactical urbanism demonstration projects.
- **Alternatives.** Create and refine land use and transportation alternatives, including identifying the community's preferred land use plan.
- **Policy and Plan Development.** Develop policies that support the preferred vision.
- **Draft and Final Program Environmental Impact Report (PEIR).** Includes preparing a Draft PEIR for the General Plan 2045 and responding on comments received on this draft to produce the Final PEIR.
- **Housing Element.** The Housing Element for the 6th Cycle (2021–2029) was adopted separately by the City Council in August 2022.

In compliance with the State CEQA Guidelines, the City has taken steps to provide opportunities for the public to participate in the environmental process. During the preparation of the Draft PEIR, an effort was made to contact various State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project.

1.4.2 Notice of Preparation

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 34-day period commencing March 1, 2022 and concluding on April 4, 2022. The purpose of the NOP was to provide formal notice that the City was preparing a Draft PEIR for the General Plan 2045, to present the environmental topics preliminarily identified by the City for evaluation in the Draft PEIR, and to solicit input regarding the scope and content of the information to be included in the Draft PEIR.

In order to maintain compliance with the recently adopted housing element and to comply with state law, the city expanded the scope of the project to include the Zoning Code Update, which implements the Housing Element and proposed General Plan 2045. As a result, the city issued a Recirculated NOP for a 33-day period commencing on February 15, 2024 and ending on March 18, 2024.

Both NOPs included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft PEIR. The City posted the NOPs on the City Planning website along with information regarding the process for providing comments. The NOPs, Initial Study, and comments received during the scoping processes are included in Appendix A of this Draft PEIR (as Appendix A-1, A-2, and A-3, respectively).

1.4.3 Public Scoping Meeting

The City conducted a virtual public scoping meeting on March 24, 2022 at 6:00 p.m. using Zoom. As a result of the Recirculated NOP, a second virtual public scoping meeting was held on March 7, 2024 at 6:00 p.m. using Zoom. The public scoping meetings provided interested individuals, groups and public agencies the opportunity to provide oral and written comments to the lead agency regarding the scope and focus of the Draft PEIR as described in the NOPs. The meetings included a presentation by the City and their environmental consultant that included an overview of the Project, information regarding the CEQA process and opportunities for public input, issues identified for analysis in the Draft PEIR, and solicitation of oral and written comments on environmental issues and alternatives the public would like to see evaluated in the Draft PEIR.

1.4.4 Comments Received

Comments on the scope and content of the Draft PEIR were received in writing during the 34-day circulation period for the NOP. No verbal or written comments related to the Draft PEIR were received at the virtual scoping meeting, and eight written comment letters responding to the NOP were submitted to the City. Copies of the comment letters received during the NOP circulation period are provided in Appendix A of this PEIR and are summarized in the Executive Summary, in the subsection entitled Areas of Controversy and Issues to be Resolved.

Comments on the scope and content of the Draft PEIR were also received in writing during the 33-day circulation period for the Recirculated NOP. Three verbal comments were received at the Recirculated NOP scoping meeting, and eight written comment letters responding to the Recirculated NOP were submitted to the City. Copies of the comment letters received during the Recirculated NOP circulation period are provided in Appendix A of this PEIR and are summarized in the Executive Summary, in the subsection entitled Areas of Controversy and Issues to be Resolved.

1.5 Scope of the PEIR

1.5.1 Baseline and Planning Horizon

For analytic purposes in this Draft PEIR, the baseline year established for existing conditions is 2019 unless otherwise noted and the horizon year representing future conditions is 2045. In cases where current data is not available, the most recent known data is used to depict baseline conditions. The horizon year of 2045 represents the target year of the Project when projects and programs identified in the General Plan 2045 are anticipated to be fully implemented.

1.5.2 Environmental Issue Areas

This Draft PEIR assesses the potential environmental impacts that could occur with implementation of the Project. Section 15064 of the CEQA Guidelines states that in evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

The scope of the Draft PEIR includes evaluation of potentially significant environmental issues raised in response to the NOPs and during scoping discussions. As noted above, the NOPs and all comment letters received during the comment period are included in Appendix A. Based on the scoping process, the following environmental issue areas are addressed in detail in this Draft PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the Draft PEIR. Pursuant to CEQA Guidelines Section 15128 (Effects Not Found to Be Significant) environmental impacts related to agricultural and forestry resources were not considered significant and therefore, are not fully discussed in the Draft PEIR. (See Chapter 6, Other CEQA Considerations, for a brief summary). In addition, Chapter 6 addresses environmental topics required by CEQA that are not covered within the other chapters of this EIR, including: (1) significant unavoidable impacts, (2) irreversible environmental changes, (3) growth inducing impacts, and (4) potential secondary effects.

Consistent with CEQA Guidelines (Section 15126.6[d]), this Draft PEIR includes the assessment of a reasonable range of alternatives to the Project that could feasibly attain most of the Project objectives while avoiding or substantially lessening the environmental effects of the Project. This analysis is included in Chapter 5, *Alternatives*.

1.6 Format of the Draft PEIR

The Draft PEIR includes an Executive Summary, eight Chapters, and appendices, which are organized as follows:

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

Chapter 1, Introduction, describes the purpose and use of the PEIR, provides a brief overview of the Project and the environmental review process, and outlines the organization of the PEIR.

Chapter 2, Project Description, describes the location and Planning Area, objectives, buildout, and the goals, programs, and policies for implementation of the Project.

Chapter 3, Environmental Setting, provides a generalized overview of the existing physical environmental setting in which the Planning Area is located. This overview of the existing physical environment generally serves as the environmental baseline for the analysis of potential environmental impacts under CEQA. This section also includes a discussion of the methodology for analyzing potential cumulative impacts.

Chapter 4, Environmental Impact Analysis, contains the environmental setting, Project and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the environmental topic areas indicated above.

Chapter 5, Alternatives, evaluates the environmental effects of feasible project alternatives, including the No Project Alternative. This section also identifies the environmentally superior alternative.

Chapter 6, Other CEQA Considerations, includes a discussion of environmental topic areas required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, potential secondary effects caused by the implementation of the mitigation measures for the Project, and growth inducing impacts.

Chapter 7, References, identifies the references and sources used in the preparation of this PEIR.

Chapter 8, List of PEIR Preparers and Organizations/Persons Contacted, lists the individuals involved in preparation of this PEIR and persons, public agencies, and organizations that were consulted or who contributed to the preparation of this PEIR.

The environmental analyses in this PEIR are supported by the following appendices:

- Appendix A: Notice of Preparation, Initial Study, and Scoping Comments
 - A-1: NOP and Recirculated NOP
 - A-2: Initial Study
 - A-3: Scoping Comments from NOP and Recirculated NOP
- Appendix B: Air Quality Worksheets
- Appendix C: Biological Resources Database Search Results
- Appendix D: Energy Data
- Appendix E: Greenhouse Gas Emissions Worksheets
- Appendix F: Noise Measurement Data
- Appendix G: Traffic
 - G-1: CEQA Transportation Analysis Memorandum
 - G-2: VMT Traffic Data
- Appendix H: Native American Consultation

1.7 Public Review of the Draft PEIR

The Draft PEIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the City, serving as the Lead Agency: (1) published a Notice of Availability (NOA) of a Draft PEIR which indicated that the Draft PEIR was available for review at the City’s Current Planning Division (9770 Culver Boulevard, Culver City, CA 90232); (2) posted a copy of the NOA and Draft PEIR on the City’s website (<https://www.pictureculvercity.com/environmental-review>); (3) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (4) sent a NOA to NOP commenters as well as the last known name and address of all organizations and individuals who previously requested such notice in writing. Proof of publication is available at the City. The public comment period begins on **March 28, 2024**, and will end on **May 13, 2024**.

The Draft PEIR is available for review online at the City’s Advance Planning Division’s website at: <https://www.culvercity.org/Have-Your-Say/A-Picture-Culver-City-General-Plan-2045>. Hardcopies of the Draft PEIR are available for review at City Hall, as well as the Culver City Julian Dixon Library.

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

Mail: Troy Evangelho, AICP, Advance Planning Manager
City of Culver City Advance Planning Division
9770 Culver Boulevard
Culver City, CA 90232

Phone: (310) 253-5740

Email: advance.planning@culvercity.org

Upon the close of the Draft PEIR public review period, the City will evaluate and prepare responses to all written comments related to environmental issues and the adequacy of the Draft PEIR received during the public review period. A Final PEIR will then be prepared. The Final PEIR will consist of the Draft PEIR, any necessary revisions to the Draft PEIR, written comments received during the public circulation period for the Draft PEIR, and City responses to those comments.

CHAPTER 2

Project Description

2.1 Introduction

Consistent with Section 15168 of the State CEQA Guidelines, this Draft Program Environmental Impact Report (Draft PEIR) provides a programmatic analysis of the environmental impacts associated with implementation of the goals and policies and the projected buildout of the comprehensive update to the General Plan, Picture Culver City: General Plan 2045 (General Plan 2045 or General Plan Update) and amendments to the City’s Zoning Code that are necessary to implement the General Plan 2045. These collectively are referred to as the Project.

California Government Code Section 65300 et seq. mandates that all counties and incorporated cities prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. State law encourages cities to keep general plans current through regular updates. The Project includes the first comprehensive update of all nine elements of the Culver City General Plan. Previously, the City’s various General Plan elements have been updated between 1968 and 2014. The General Plan 2045 would provide a framework and vision to guide growth and development within the Planning Area, which includes the City’s jurisdictional boundaries and its Sphere of Influence (SOI), through the planning horizon year of 2045. Together with the Zoning Code Update, the 2045 General Plan would serve as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council.

By law, a general plan must be an integrated, internally consistent statement of City policies. Government Code Section 65302 requires that a general plan include the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Senate Bill (SB) 1000 and Government Code Section 65302 require that since disadvantaged communities have been identified within the City, the Plan must also address Environmental Justice (EJ) either as a standalone element or integrating related goals, policies, and objectives throughout other elements. The General Plan 2045 includes a Community Health and Environmental Justice element. Additional elements may be included as well, at the discretion of the City. The General Plan 2045 includes six optional elements: Governance and Leadership; Arts, Culture, and Creative Economy; Economic Development; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction; and Infrastructure. All elements have equal weight, and no one element supersedes another. Cities may amend the general plan four times a year (each amendment may include any number of changes), and cities are encouraged to keep the plan current through regular updates.

The City adopted the 2021–2029 Housing Element Update in August 2022. The Housing Element is one of the State-mandated elements that must be included in the City’s General Plan. State law stipulates that the Housing Element include certain items, such as a Housing Needs Assessment; goals, policies, and objectives regarding housing in City; and implementation programs to work toward achieving those goals. On December 17, 2021, the City adopted a Negative Declaration for the 2021–2029 Housing Element Update, outlining the plan for accommodating the City’s share of the regional housing need. For the SCAG 6th Cycle Housing Element planning period of 2021–2029, the City received a Regional Housing Needs Allocation (RHNA) of 3,341 units. Per State mandate, the City must zone sufficient land for housing affordable to people at all income levels.

This chapter introduces the purposes and objectives of the Project and summarizes specific information describing the General Plan 2045. This includes a description of the existing regional and local project setting; an outline of the projected population and employment growth rates, and development patterns through the 2045 planning horizon year; the proposed land use diagram; key data tables; and key policy directions. These aspects of the Project provide the basis for the environmental analysis in Chapter 4, *Environmental Impact Analysis*.

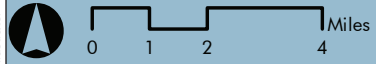
2.2 Regional Location and Existing Setting








2.2.1 Regional Location

Culver City is located in the western area of Los Angeles County in Southern California, as shown in **Figure 2-1, Regional and Project Vicinity**. 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. Culver City is situated 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.

2.2.2 Planning Area

The General Plan Planning Area, as shown in **Figure 2-2, Planning Area**, includes the city of Culver City and its unincorporated Sphere of Influence (SOI). The Planning Area includes approximately 3,910 acres of land, including approximately 3,280 acres of land (84 percent) within the City’s jurisdictional boundaries and approximately 630 acres of land (16 percent) in its SOI. The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the City. The SOI is located to the east of the City boundary in the Baldwin Hills area of Los Angeles County, west of La Cienega Boulevard.



-  City Limits
-  Sphere of Influence
-  Metro Stations
-  Metro Lines
-  Freeway/Highway
-  Regional Parks and Open Space
-  Waterbody

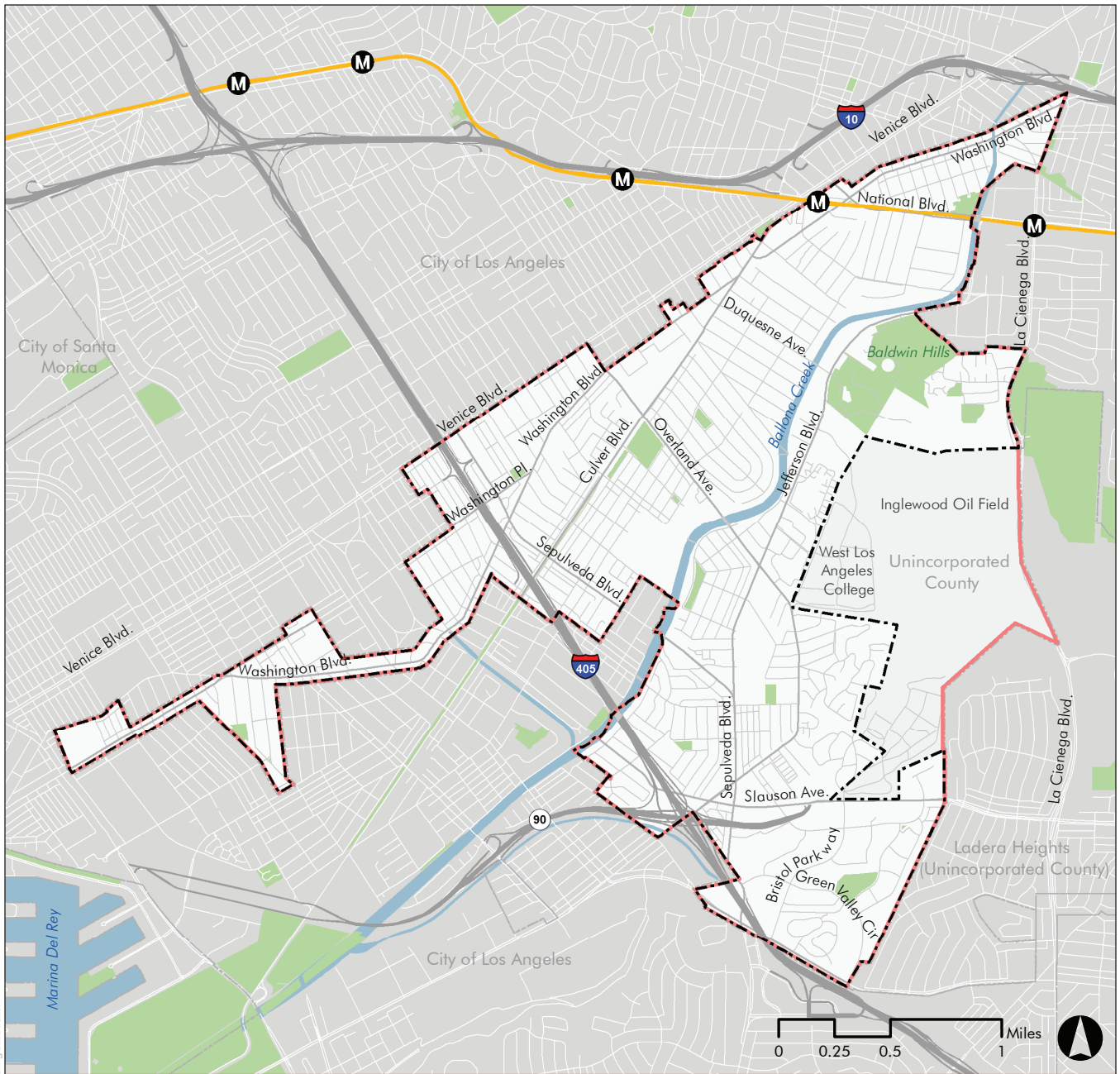
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SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 2-1
Regional and Project Vicinity





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- City Limits
- Sphere of Influence
- M Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody



SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 2-2
Planning Area



2.2.3 Existing Setting and Land Uses

The current General Plan includes nine elements, which have been updated between 1968 and 2014, providing the current goals and policies, including land use designations, that govern the Planning Area. The City is generally divided into 15 neighborhoods as shown on **Figure 2-3, Planning Area Neighborhoods**.

Existing developed land uses in the Planning Area include single family residential (28.8 percent); oil field (13.9 percent); retail and service uses (10.9 percent); 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 (10.5 percent). The existing General Plan Land Use Map is shown in **Figure 2-4, Existing General Plan Land Use Map**. **Table 2-1, Existing General Plan Land Use Designations**, provides the current land use designations that apply throughout the Planning Area with the acreage and percentage of land coverage for each designation.

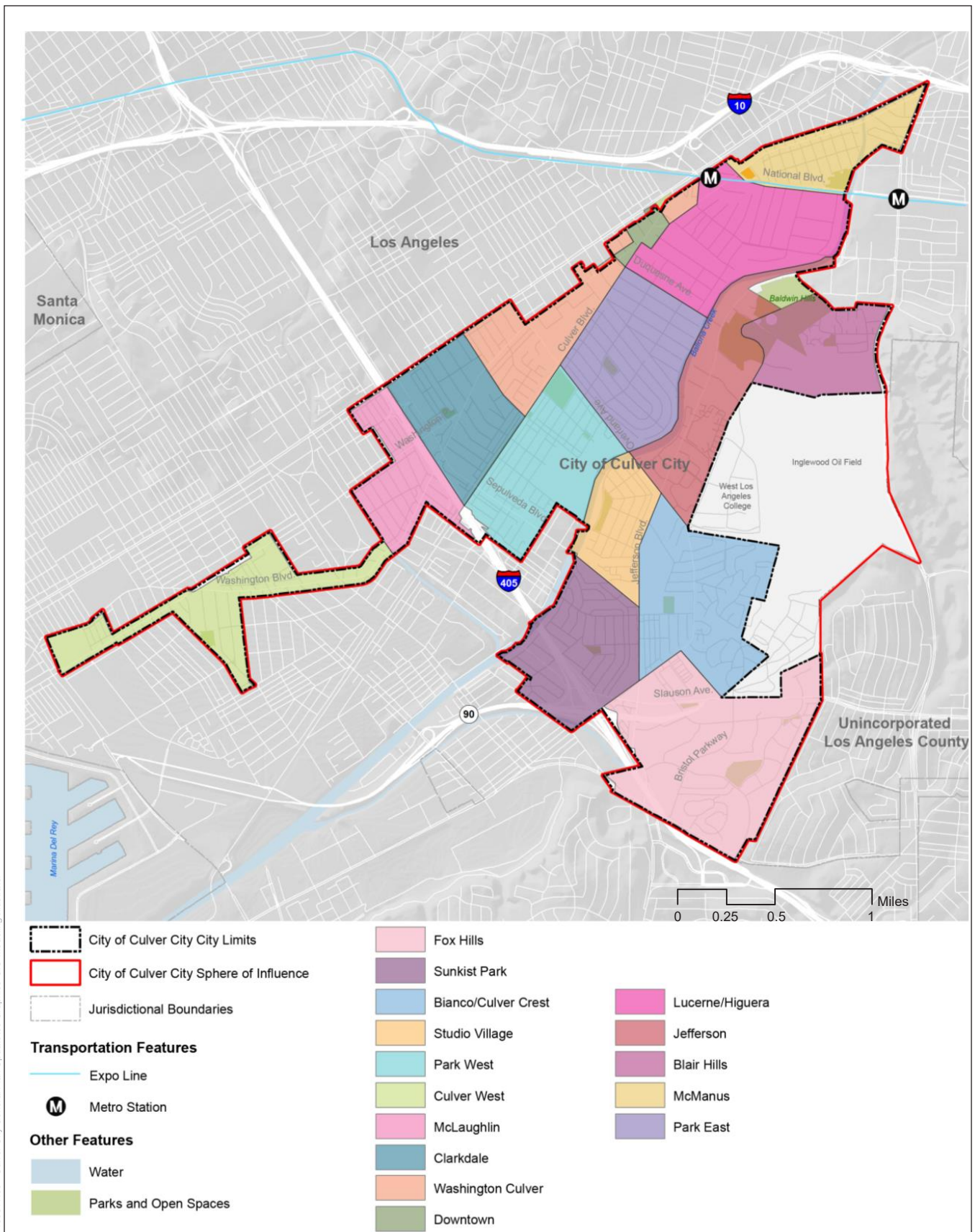
**TABLE 2-1
EXISTING GENERAL PLAN LAND USE DESIGNATIONS**

Land Use Designation	Acres	Percentage ^a
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
Total^b	3,196.9	100.0

^a The area is calculated for land within the Planning Area.

^b Totals may not add due to rounding.

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

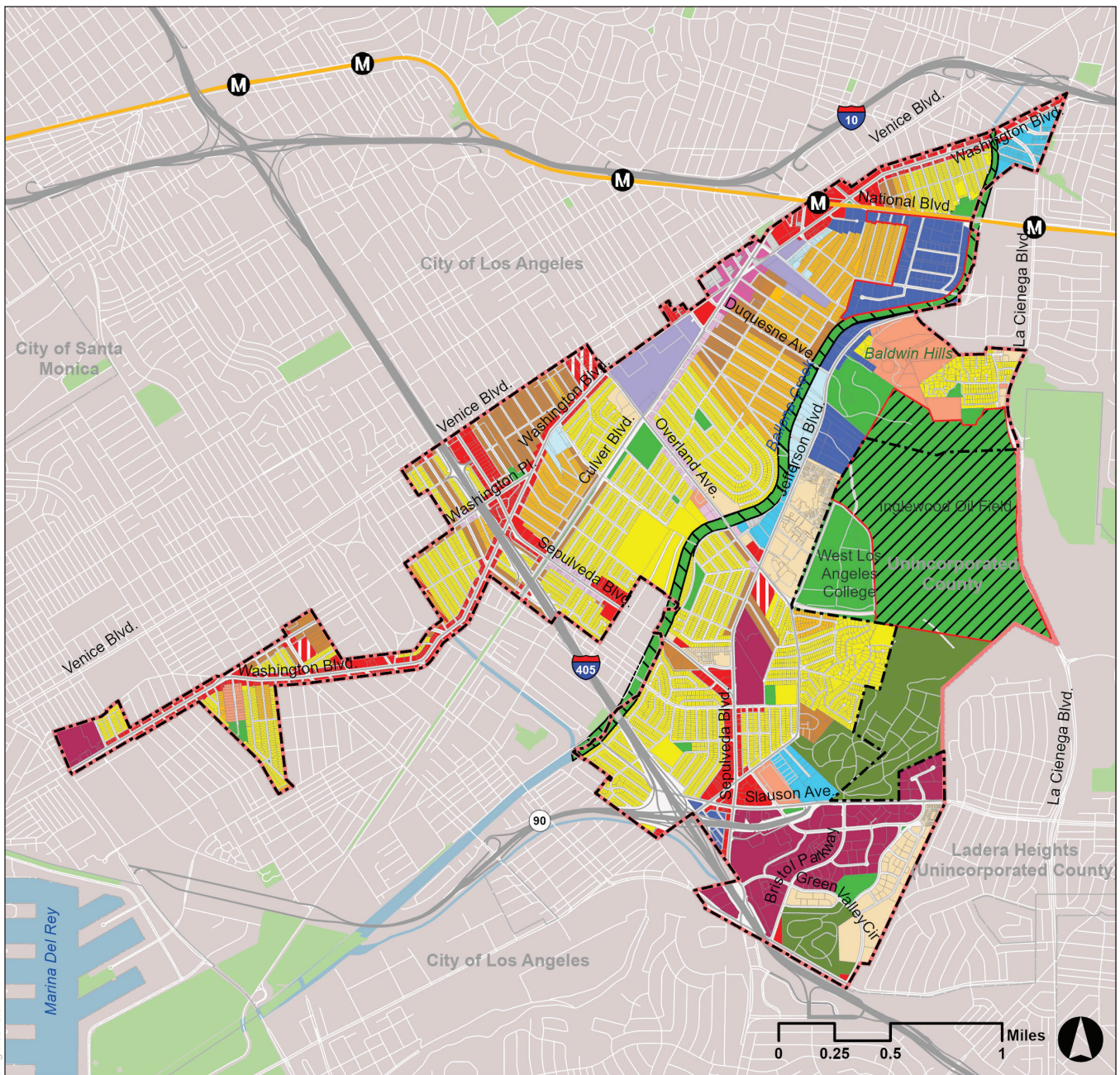


SOURCE: City of Culver City, 2019; County of Los Angeles, 2019

Culver City General Plan 2045

Figure 2-3
Planning Area Neighborhoods





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- | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> City Limits Sphere of Influence Metro Station E Line (Expo) Major Roads Local Roads Parks and Open Space Waterbody | <p>Residential Uses</p> <ul style="list-style-type: none"> Low Density Single Family Low Density Two Family Low Density Three Family Low Density Multiple Family Medium Density Multiple Family Planned Residential Development <p>Commercial Uses</p> <ul style="list-style-type: none"> Neighborhood Serving Corridor General Corridor Downtown Community Serving Center Regional Center | <p>Industrial Uses</p> <ul style="list-style-type: none"> Light Industrial Industrial Park <p>Other Uses</p> <ul style="list-style-type: none"> Studio Cemetery Open Space Institutional <p>Focused Special Study Areas</p> <ul style="list-style-type: none"> Ballona Creek Hayden Industrial Tract Blair Hills/Baldwin Hills |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 2-4
Existing General Plan Land Use Map



As shown in Table 2-1, approximately 1,408 acres or 44 percent of the land in the Planning Area is designated for residential use. The majority of the residential land is designated for single family residences, with 733.6 acres or 22 percent designated Low Density Single Family within the Planning Area. Open space accounts for the second highest amount of land, with 633 acres or 19.8 percent of the land designated Open Space, although 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 designation covering 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 designation comprising the majority of the industrial land uses and covering 135.6 acres (4.2 percent) of the Planning Area.

2.3 Purpose and Objectives of the Project

This section provides a description of the Project’s purpose and objectives as required under CEQA Guidelines Section 15124(b). The General Plan 2045 would replace the existing General Plan in its entirety.

California Government Code Section 65300 requires each city and county in California to adopt a general plan “for the physical development of the county or city, and any land outside its boundaries which...bears relation to its planning.” The underlying purpose of the Project is to comprehensively update the General Plan to establish a long-range vision that reflects the unique needs of the City and provides clear direction to improve the quality of life for residents, businesses, and visitors. In addition, the purpose of the Project is also to provide the amendments necessary to the Zoning Code to implement the General Plan 2045. The General Plan can be considered the City’s development constitution, containing both a statement of the community’s vision of its long-term development as well as the policies to support that vision by guiding the physical growth of the city. The General Plan 2045 contains policies to guide decision-making related to land use and community character; equity, community health and environment; public safety; housing; mobility; parks and recreation; infrastructure; greenhouse gas reduction; conservation; safety; and noise.

The General Plan 2045 is a document that would be adopted by the City Council to serve several purposes:

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision;
- Establish long-range development policies that will guide City departments, as well as Planning Commission and City Council decision-making;
- Provide a basis for judging whether specific development proposals and public projects are in harmony with plan policies;
- Designate land uses in a way that meets future land needs based on the projected population and job growth;
- Allow City departments, other public agencies, and private developers to design projects that will minimize hazards; and

- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance, subdivision regulations, comprehensive plans, and the Capital Improvement Program.

The General Plan 2045 will establish the course for the next two decades for the city to foster a vibrant, unique, and diverse community with a strong social and economic fabric stitched together by its arts and cultural assets, creative enterprises, high-quality services, and inclusiveness. Core values include equity and inclusion; sustainability; innovation and creativity; and compassion and community. At the outset of the General Plan 2045 process, the following Guiding Principles were developed, which are specific and objective benchmarks that guided the development of the General Plan 2045:

- Provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures;
- Advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations, including persons experiencing homelessness, the elderly, and persons with disabilities;
- Create more opportunities to broaden and deepen civic engagement that bring more of Culver City's diverse voices to the decision-making table;
- Adopt innovative and equitable policies to eliminate greenhouse gas emissions (decarbonize buildings and industry), reduce energy and water use, encourage the purchase of 100 percent renewable, carbon-free electricity, foster the transition to zero-emission vehicles, and adapt to climate disruption, ensuring all residents, are resilient to climate hazards;
- Foster harmony between people and the environment through continued sustainability efforts, urban ecology, and stewardship of natural resources, like the Ballona Creek and Baldwin Hills, for the benefit of future generations;
- Cultivate social connections between residents, workers, businesses, and visitors through urban design that sustains and revitalizes the public realm, creates great places to gather, adapts to a changing climate, and promotes public safety;
- Be a creative and proactive leader in solving regional, state, and national challenges around issues like housing, mobility, public safety, equity, climate change, and environmental pollution and disruption;
- Elevate community health and health equity through new, improved, and well-maintained public amenities that are accessible to all—like parks, sport courts and fields, gathering places, healthy and affordable food, natural resources, and community services—that allow people of all ages and abilities to thrive physically, socially, and mentally;
- Sustain arts and culture in Culver City, including visual, performing, literary, and culinary arts. Support the continued preservation of historic and cultural resources in Culver City;
- Support the continued growth of creative industries as the cornerstone of the renowned arts and cultural identity and unique regional economic role of Culver City, including digital media, architecture and interior design, and visual and performing arts;

- Practice resilient and sustainable solutions to maintain and improve infrastructure, including water, road infrastructure, and broadband. Ensure these solutions are implemented equitably throughout the city. Embrace innovative and responsible use of technology to improve City operations, enhance public participation, and build smart, secure, and adaptable infrastructure systems;
- Build more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities;
- Support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of industries that provide employment, commercial, and experiential opportunities. Ensure the economy is resilient to shocks and stresses, like pandemics, seismic events, flooding, wildfires and other natural and human made disasters.

2.4 Project Characteristics

The Project is the adoption and implementation of a comprehensive update to the Culver City General Plan and amendments to the City’s Zoning Code to implement the General Plan 2045.

2.4.1 General Plan 2045

The General Plan 2045 would align the Culver City General Plan with current and future community conditions and needs, through the Plan’s 2045 planning horizon. The General Plan Update process was initiated in 2019 and a detailed history of process is provided in Chapter 1, *Introduction*.

The Land Use and Community Design Element includes updated Land Use Designations and an updated General Plan Land Use Map, and the Mobility Element includes an updated Planned Circulation Map. The General Plan 2045 also includes the Community Health and Environmental Justice Element in compliance with SB 1000 to address environmental justice and priority neighborhoods and updates to the Safety Element to address emergency evacuation planning in compliance with SB 99.

The analysis provided in this PEIR is based on the potential environmental impacts that may occur as a result of implementation of the General Plan 2045. The following elements include goals, objectives, and policies that are intended to guide growth and development within the City that may result in impacts to the environment: Land Use and Community Design; Community Health and Environmental Justice; Housing; Mobility; Parks, Recreation, and Public Facilities; Infrastructure; Greenhouse Gas Reduction; Conservation; Safety; and Noise.¹ The goals, objectives, and policies of the General Plan 2045 are considered part of the Project and are included in the environmental analysis where they have a mitigating effect. A detailed description of key elements and the features analyzed throughout this PEIR are provided below.

¹ The General Plan 2045 also includes Governance and Leadership; Arts, Culture, and the Creative Economy; and Economic Development Elements

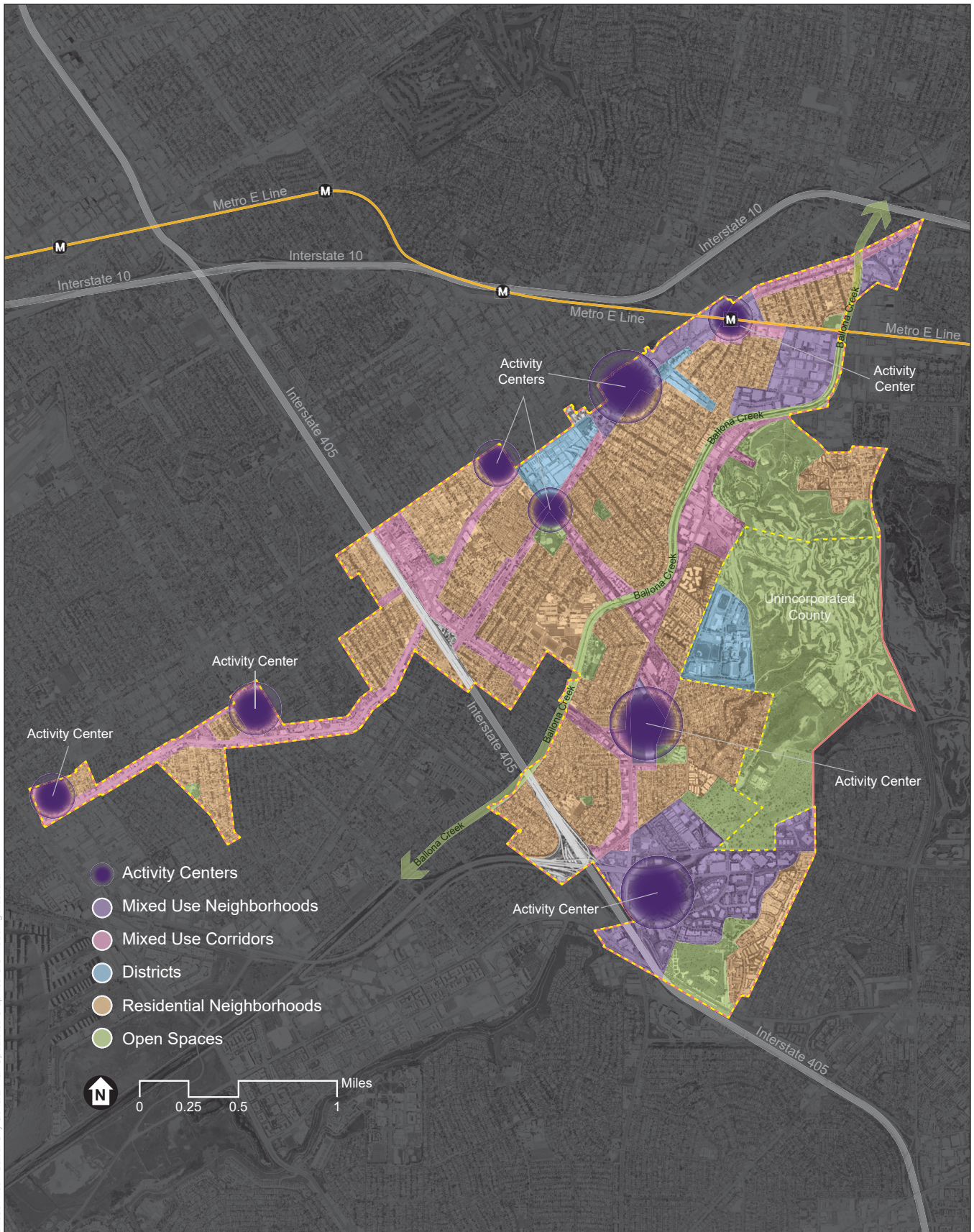
Land Use and Community Design

Land Use Approach

The Land Use and Community Design Element guides the evolution of urban form and land use patterns in Culver City through the 2045 General Plan horizon year. As described above, the City is largely urbanized and has a limited amount of vacant land. The most prevalent existing land uses are single-family residential (29 percent), oil field (14 percent), retail and services (11 percent), and civic and institutional (11 percent). Land uses proposed within the Planning Area can be broken down into four main categories of development: activity centers, commercial corridors, residential neighborhoods, and parks/open space. The layout of these categories within the Planning Area are shown in **Figure 2-5, City Structure and Neighborhood Diagram**, and are defined as follows:

- **Activity Centers:** Places where people and activities are clustered, such as a corner on main street or central shopping area that brings residents together constitutes a center of local activity. Pedestrian-oriented areas with creative businesses, offices, retail, housing development and gathering spaces with easy access to active transportation, such as Downtown, a center for gathering, tourism, and commercial activity, including a mix of retailers, restaurants, offices, and civic uses.
- **Commercial Corridors:** Major boulevards and arterial streets that run through Culver City and create a pattern of residential, non-residential, and mixed-use districts. The parcels that line the corridors of Slauson Avenue, Washington Boulevard, Sepulveda Boulevard, Jefferson Boulevard, National Boulevard, and Culver Boulevard vary in size and use and are almost all commercial buildings.
- **Residential Neighborhoods:** Residential areas that vary in building size and housing type but are largely characterized by small parcels that front smaller neighborhood streets. With few exceptions, the neighborhood scale is smaller than the scale of development found on the corridors.
- **Parks and Open Space:** Parks, recreational facilities, cemeteries, and open spaces occupy about 10 percent of the City, with the majority of parks located in residential neighborhoods. Ballona Creek, a flood control channel also mitigates flooding, restores native ecologies, and provides a multi-purpose open space and recreational corridor.

New development would primarily occur on parcels that already contain some existing homes or businesses. The City's primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the City's commercial corridors through parking management strategies, active street frontage guidelines, and public realm improvements. To support the community's housing vision, the land use vision allows for new residential and mixed-use development within the City's industrial areas. With this approach to accommodating growth, it is anticipated that construction for infill and redevelopment of existing land uses would occur across many areas of the City, including those areas that would maintain land use designations similar to existing conditions.



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SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 2-5
City Structure and Neighborhood Diagram



By distributing growth along corridors, including in areas well served by transit, housing will be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and transit-oriented communities (TOC), the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the Inglewood Oil Field (IOF).² The General Plan 2045 would maintain existing parks and open space resources while continuing to expand these resources in an equitable manner.

The Land Use and Community Design Element includes a land use map which graphically represents the land use vision for the Planning Area, which upon implementation, would achieve the City's goals land use approach and vision. See **Figure 2-6, Draft General Plan Land Use Map**, for the projected distribution of land uses throughout the Planning Area.

The analysis provided in this PEIR considers the anticipated environmental effects associated with development and operation of the distribution of the various land use designation throughout the Planning Area.

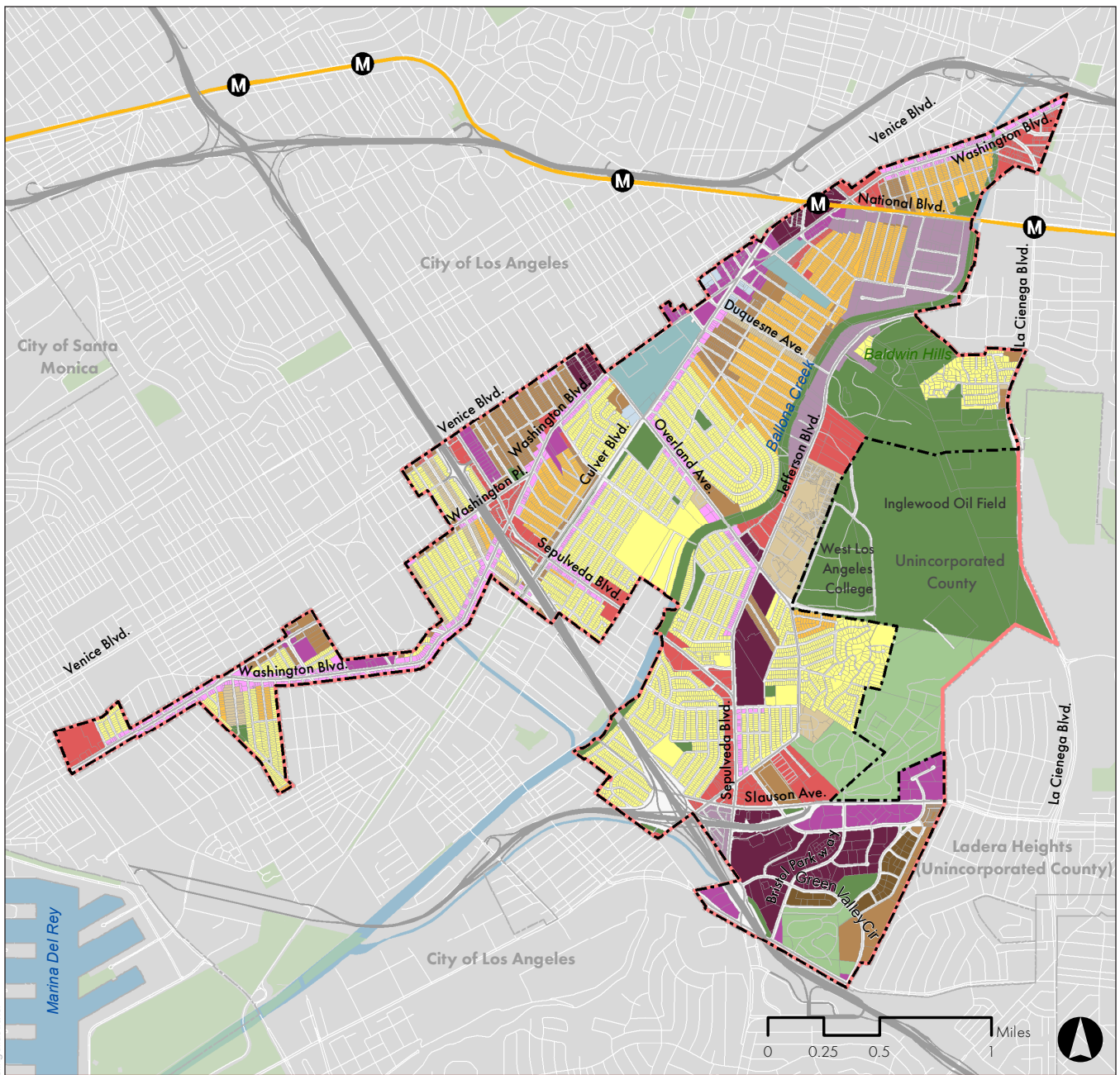
Land Use Designations

The General Plan land use designations identify allowed uses and development intensity for each parcel of land. The designations focus broadly on future growth and physical development as opposed to what is on the ground today. Overall, there are three broad categories of land use designations: residential, mixed use, and special purpose. Residential designations define the predominantly residential areas of the city and range from single family homes to multi-family housing, while mixed use designations provide areas for a range of residential and commercial uses in vertical or horizontal patterns. The special purpose designations identify a range of institutional uses and public facilities, such as schools, parks, and government facilities.

State law requires that the categories used on the General Plan Land Use Map be accompanied by definitions. These definitions establish the general intended uses and development intensities.

Table 2-2, Proposed General Plan Land Use Designations, provides the proposed land use designations and general development parameters that are contained in the General Plan 2045 compared to the existing General Plan land use designations. Other uses that are allowed through zoning may be deemed compatible with the general intended uses. More specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and tailored building heights are contained in the Zoning Code Update, described below.

² The IOF encompasses approximately 1,000 acres based on surface field boundaries, with roughly 80 acres within the limits of Culver City and the remaining 920 acres within unincorporated County of Los Angeles (County), of which approximately 400 acres are located within the City's SOI.



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|--|----------------------|--|----------------------------|--|----------------------|
| | Metro Station | | Single Family | | Mixed Use Medium |
| | City Limits | | Two Family | | Mixed Use High |
| | Sphere of Influence | | Low Density Multifamily | | Mixed Use Industrial |
| | E Line (Expo) | | Medium Density Multifamily | | Special Uses |
| | Major Roads | | High Density Multifamily | | Studio |
| | Local Roads | | Mixed Use Corridor 1 | | Open Space |
| | Parks and Open Space | | Mixed Use Corridor 2 | | Cemetery |
| | Waterbody | | | | Transportation |

SOURCE: City of Culver City, 2024; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 2-6
Draft General Plan Land Use Map



**TABLE 2-2
PROPOSED GENERAL PLAN LAND USE DESIGNATIONS**

Proposed Land Use Designations	Maximum Residential Density	Maximum Non-Residential FAR	Description	Existing GP Designations
Residential Uses				
Single Family	8.7 du/ac	N/A	Single family	Low Density Single Family (8.7 du/ac)
Two Family	17.4 du/ac	N/A	Single family and duplexes	Low Density Two Family (17.4)
Medium Density Multifamily	50 du/ac	N/A	Multifamily residential	Low Density Three Family (29 du/ac), Low Density Multifamily (15 du/ac), Medium Density Multifamily (29 du/ac)
High Density Multifamily	70 du/ac	N/A	Multifamily residential	Medium Density Multifamily, Planned Residential Development, Low Density Multifamily, Low Density Two Family
Mixed Uses				
Mixed Use Corridor 1	35 du/ac	2.0	Lower-scale mixed use, residential, and neighborhood serving commercial	General Corridor, Neighborhood Serving Corridor, Medium Density Multifamily
Mixed Use Corridor 2	50 du/ac	3.0	Moderate-scale mixed use, residential, and neighborhood serving commercial	General Corridor, Industrial Park, Industrial, Light Industrial, Medium Density Multifamily
Mixed Use Industrial	65 du/ac	2.0	A broad range of mixed use, residential, and industrial	Industrial, Light Industrial
Mixed Use Medium	65 du/ac	3.0	A broad range of mixed use, residential, and commercial	Regional Center, General Corridor, Community Serving Center, Downtown, Industrial
Mixed Use High	100 du/ac	4.0	Large-scale mixed use, residential, and commercial	Regional Center, Community Serving Center, General Corridor
Special Uses				
Studio	N/A	Varies, maximum established by project	Private studio campus with corporate headquarters, offices, facilities, and sets	Studio
Institutional	N/A	4.0	Public facilities, including but not limited to government offices, community facilities, and hospital uses	Institutional, Downtown (City Hall, Fire Station), Medium Density Multifamily (City Hall, Police Department, etc.)
Open Space	N/A	0.5	Parks and recreation complexes	Open Space, Ballona Creek
Cemetery	N/A	0.5	Cemeteries	Cemetery
Transportation	N/A	0.5	Transportation, transition, and buffer uses	Transportation

SOURCE: Raimi + Associates, 2023

Residential

The General Plan 2045 establishes the dwelling units per acre (du/ac) to calculate the maximum number of primary dwelling units for residential density. Accessory dwelling units (ADUs) are not counted toward calculating density. The residential unit density is calculated based on net area of the parcel, which excludes dedicated streets and private easements. Under limited circumstances, an increase in density above the maximum allowable density can occur, such as density bonuses for affordable housing, as well as other incentive-based local ordinances that implement the goals of the General Plan.

The General Plan 2045 includes five residential land use designations in order to provide for development of a range of housing types.

Single-Family Residential

Single Family Residential designation allows detached single-family dwellings with a maximum density of 8.7 du/ac. Additional units are permitted through the City's ADU Ordinance, SB 9 implementation.

Two Family Residential

Two Family Residential designation allows single-family dwellings and duplexes with a maximum density of 17.4 du/ac. The Two Family Residential designation is intended to maintain the character of existing neighborhoods, while allowing the opportunity for two-family residential development.

Low Density Multifamily

The Low Multi-Family designation applies to existing mixed-density neighborhoods and allows a maximum density of 35 du/ac. These units can be configured into a variety of housing types, including low- and medium-density multifamily housing.

Medium Density Multifamily

The Medium Multi-Family designation applies to existing mixed-density neighborhoods and allows a maximum density of 50 du/ac. These units can be configured into a variety of housing types, including low- and medium-density multifamily housing.

High Density Multifamily

High Density Multifamily designation allows a maximum density of 100 du/ac. These dwelling units can be configured into a variety of multifamily housing types.

Mixed Use

Five mixed-use designations are established to encourage a mixture of land uses, including residential, commercial, retail, industrial, and public spaces serving both residents and visitors.

Mixed Use Corridor 1

Neighborhood/Corridor Mixed Use (MU) 1 is located primarily along existing commercial corridors with smaller lot sizes. This designation allows for lower-scale, mixed use, as well as stand-alone residential and commercial developments serving surrounding neighborhoods and

visitors from nearby areas. The maximum density is 35 du/ac for residential components and the maximum non-residential intensity is 2.0 FAR.

Mixed Use Corridor 2

Neighborhood/Corridor MU 2 is located primarily in the Arts District industrial area, and existing commercial/industrial corridors with larger lot sizes, such as Jefferson Boulevard and Sepulveda Boulevard. This designation allows lower-scale mixed use, as well as stand-alone residential and commercial developments serving surrounding neighborhoods and nearby areas. The maximum density is 50 du/ac for residential uses and the maximum non-residential intensity is 3.0 FAR.

Mixed Use Industrial

Mixed Use Industrial is located in the Hayden Tract Industrial Area and portions near TOD and along Jefferson Boulevard. This designation allows for residential, mixed use, and light industrial uses that are compatible with residential, such as creative office, research and development. Industrial mixed-use districts will continue to serve as a creative anchor in the City, providing opportunities for legacy and new creative businesses, fostering architectural and arts innovation, and accommodating new residential uses. The maximum density is 65 du/ac for residential uses and the maximum non-residential intensity is 2.0 FAR.

Mixed Use Medium

Mixed Use Medium is located primarily in Downtown and existing larger commercial and office centers. This designation allows medium scale mixed use, as well as stand-alone residential and commercial developments serving surrounding neighborhoods and nearby areas. The maximum density is 65 du/ac for residential uses and the maximum non-residential intensity is 3.0 FAR.

Mixed Use High

Mixed Use High is located primarily in the Culver City Metro E Line station area and existing larger commercial and office centers. This designation allows large scale mixed use, as well as stand-alone residential and commercial developments. The maximum density is 100 du/ac for residential uses and the maximum non-residential intensity is 4.0 FAR.

Special Purpose

There are five special purpose land use designations to identify public spaces and resources unique to the City.

Studio

The Studio designation recognizes the long-standing existence of studio uses within Culver City. It is designed and intended to encourage and support studio and media businesses, while ensuring their future expansion will minimize potential impacts on adjacent residential land uses. The Studio designation recognizes the unique densities, uses and relationships of activities on a studio lot, which are addressed specifically through a comprehensive plan.

Institutional

The Institutional designation allows for existing operations and future expansion of institutional uses including hospitals, schools, and government facilities. Densities and uses will vary depending on the type of development. The maximum non-residential intensity is 4.0 FAR.

Open Space

The Open Space designation is established to protect Culver City's open space resources that include public or private land. It is designed and intended to preserve existing and encourage future parks, open space and recreation opportunities. Associated structures should not exceed a maximum non-residential intensity of 0.5 FAR.

Cemetery

The Cemetery designation recognizes the long-standing existence and the future continuance of the Hillside Memorial and Holy Cross Cemeteries in the Fox Hills and Southern- Central Sub-Areas. It is intended to protect their future existence and to allow anticipated and well-planned expansion. Associated structures should not exceed a maximum non-residential intensity of 0.5 FAR.

Transportation

The Transportation designation is established for properties that are either located in or adjacent to a right of way or roadway. This designation is intended to allow appropriate transportation, transitional, and buffer uses. Associated structures should not exceed a maximum non-residential intensity of 0.5 FAR.

Growth Projections

The General Plan 2045 and analysis contained within this PEIR are based on certain assumptions pertaining to future growth through the horizon year 2045. This PEIR analyzes the 2045 growth projections based on an understanding of historic, current, and projected demographic and economic conditions in the Planning Area through 2045, rather than full buildout. The full buildout scenario would assume that every parcel would be developed with the maximum amount allowed under the General Plan 2045. Actual development that may occur by the horizon year is typically less than the theoretical maximum of development.

Table 2-3, *General Plan 2045 Population, Household, and Job Growth Projections*, provides the growth projections for population, housing, and jobs under the General Plan 2045. As shown therein, the General Plan 2045 projects a population of 62,400 persons in 2045, which would be an increase of 21,600 persons, compared to the existing (2020) population.³ The General Plan 2045 also projects 28,310 households in 2045, for an increase of 11,310 households compared to the existing (2019) household count. In addition, the General Plan 2045 projects 84,300 jobs in 2045, which would be an increase of 16,260 jobs compared to the existing (2019) job count.

³ The existing conditions background reports completed in 2019 established the baseline used in this PEIR and provides a conservative analysis by assuming additional growth compared to an updated baseline year. However, when developing the Growth Projections, an updated baseline (2021) is utilized for residential housing.

**TABLE 2-3
GENERAL PLAN 2045 POPULATION, HOUSEHOLD, AND JOB GROWTH PROJECTIONS**

	Existing	General Plan 2045 Projections	Net Change (General Plan 2045 – Existing)
Population	40,800 (2020)	62,400	21,600
Households	17,000 (2019)	28,310	11,310
Jobs	68,040 (2019)	84,300	16,260

SOURCES: Raimi + Associates, Preferred Plan Growth Projections, May 2023; U.S. Census Bureau, *American Community Survey 5-Year Estimates, 2017–2021*; City of Culver City, existing land use data, 2019.

Table 2-4, General Plan 2045 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 of the General Plan 2045. As shown therein, implementation of the Project is anticipated to result in a net increase of 12,700 residential units, 3,332,000 square feet of commercial uses, and 364,800 square feet of industrial uses. No change is projected for institutional square footage. As described in the Land Use Approach above, intensification of land uses is expected within the Planning Area resulting from infill development and redevelopment, thereby resulting in more overall construction. A discussion of each of these land uses is provided below.

**TABLE 2-4
GENERAL PLAN 2045 PROJECTIONS BY LAND USE**

Land Use	Existing (2019)	General Plan 2045 Projections	Net Change (General Plan 2045 – Existing)
Residential	17,010 units	29,710 units	12,700 units
Commercial ^a	28,624,900 sf	31,956,900 sf	3,332,000 sf
Industrial	1,881,100 sf	2,245,900 sf	364,800 sf
Institutional	3,076,600 sf	3,076,600 sf	0 sf

NOTES: sf = square feet

^a Studio uses, which are a defined General Plan land use designation, are included in the commercial square footage.

SOURCES: Raimi + Associates, Preferred Plan Growth Projections, November 2022; City of Culver City, existing land use data, 2019.

Residential Development

As shown in Table 2-4, the General Plan 2045 would result in an estimated 12,700 new housing units in the Planning Area by 2045, bringing the total number of housing units to approximately 29,710. The total housing unit number was calculated by considering existing housing units as of 2019, the City’s ADU permitting history, the Housing Element’s projection of SB 9 unit construction, pipeline projects (projects that are under construction, have been entitled, or are in the planning stage), and projected new housing units. The number of new housing units was derived by analyzing a realistic number of potential units that can be built given the development standards for each land use designation compared to historical density growth patterns. Therefore, the total projected housing units includes new infill, accessory dwelling

units (ADUs), housing on opportunity sites, pipeline projects, and existing residential units to remain.⁴ This new development is projected to accommodate an increase in population of 21,600 people, for a total projected population of 62,400 by 2045.⁵

Non-Residential Development

As shown in Table 2-4, the General Plan 2045 would result in a net increase of 3.7 million square feet of non-residential development in the Planning Area by 2045. Of this approximately 3.3 million square feet of space would be added in the form of commercial corridor development. In addition, approximately 364,800 square feet of industrial uses are anticipated to be added, and no increase in institutional use is anticipated. This increase in commercial and industrial development was calculated by using the square footage of non-residential square footage that could be built on vacant or underutilized land and would serve the anticipated increases in housing and jobs.

In the Planning Area as a whole, about 16,260 new jobs are projected by the year 2045, raising the total number of jobs from 68,040 in 2019 to approximately 84,300 in 2045. The net change in jobs in Table 2-3 was calculated by applying an assumed job density factor (total employees per acre) for each non-residential land use. Non-residential building area, job sector projections by 2045 for Culver City, and input from the City were utilized in developing the job density factor.

While additional construction may occur within existing non-residential areas in the form of infill and redevelopment, the analysis in this PEIR is based on the net change of land uses within the Planning Area and operations of those land uses through the year 2045.

Community Health and Environmental Justice

Community Health, and Environmental Justice Element provides goals and policies related to the equitable distribution of resources and provision of health within the Planning Area. This element also addresses the requirements of SB 1000, which requires local jurisdictions to address environmental justice, and to identify “SB 1000 Priority Neighborhoods”, which are defined as those communities that are disproportionately burdened by multiple sources of pollution and that face disproportionate impacts of climate change. Clarkdale and Culver/West are identified as “SB 1000 Priority Neighborhoods” because they are low-income areas facing housing pressures, including a high risk of displacement and potentially disproportionate affects from environmental pollution and other hazards.

Housing

The Housing Element of the City's General Plan is the primary planning guide to meet the housing needs of everyone in Culver City. It outlines goals, policies, and programs to meet these needs while balancing other community objectives and resources. While the Housing Element was adopted in 2022, the General Plan 2045 serves as the implementation mechanism for the Housing Element through the amendments to the Land Use Map, shown in Figure 2-5 above,

⁴ The number of residential units anticipated for each of these categories is identified in the Housing Element.

⁵ Population projections were derived using a household occupancy of 1.8 persons/household for existing residential units to remain and 2.5 persons/household to anticipated new development.

which would support the City's efforts to meet the State-mandated Regional Housing Needs Allocation (RHNA). The total housing growth need for the City of Culver City during the 2021–2029 planning period is 3,341 units. As shown in Table 2-4 above, the Project is anticipated to result in 12,700 additional housing units by 2045.

Mobility

The Mobility Element establishes a policy framework and proposed 2045 citywide network for all transportation modes and provides the Mobility Plan, which establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation. The Project has adapted Multimodal Street Classification principles to transition from a highway-centric functional classification system to better integrate land use context and non-motorized transportation components in the transportation network. The Project includes modal priority and special roadway designation typologies that enable the reallocation of public right-of-way to promote and encourage safe use of alternative transportation modes. These Special Classification are shown in **Table 2-5, *Special Roadway Classifications***.

The mobility network presented within the Mobility Element will be referenced and built upon by future and recurring development and capital planning processes. The Mobility Element also designates truck routes in order to facilitate goods movements while minimizing travel through residential streets. The analysis in this PEIR is based on the planned circulation network and truck route network shown in **Figure 2-7, *Roadway Network & Classification Map***, and **Figure 2-8, *Truck Route Network***.

The existing mobility network does not provide an equitable distribution of benefits and costs to all residents. Therefore, the Project helps to operationalize equity indicators within priority implementation and funding decisions to ensure future investments address gaps in underinvested areas and for the most vulnerable travelers. It also highlights targeted investments in SB 1000 Priority Neighborhoods,⁶ such as high frequency transit service and pedestrian safety projects at major intersections, to improve transit efficiency and reliability, create safer pedestrian environments to promote walking, and expand first- and last-mile mobility options near key commercial areas. The policies and actions in the Mobility Element also prioritize improvements that seek to increase physical activity and improve access to healthcare and social services, schools, employment, and healthy foods. The Project also identifies planned pedestrian, multi-modal, and transit improvements for the city, which are shown on **Figure 2-9, *Pedestrian Network***; **Figure 2-10, *Bicycle Network***; **Figure 2-11, *Transit Network***; and **Figure 2-12, *Emerging Mobility Network***.

⁶ For more information on SB 1000 neighborhoods, see the Community Health and Environmental Justice Element.

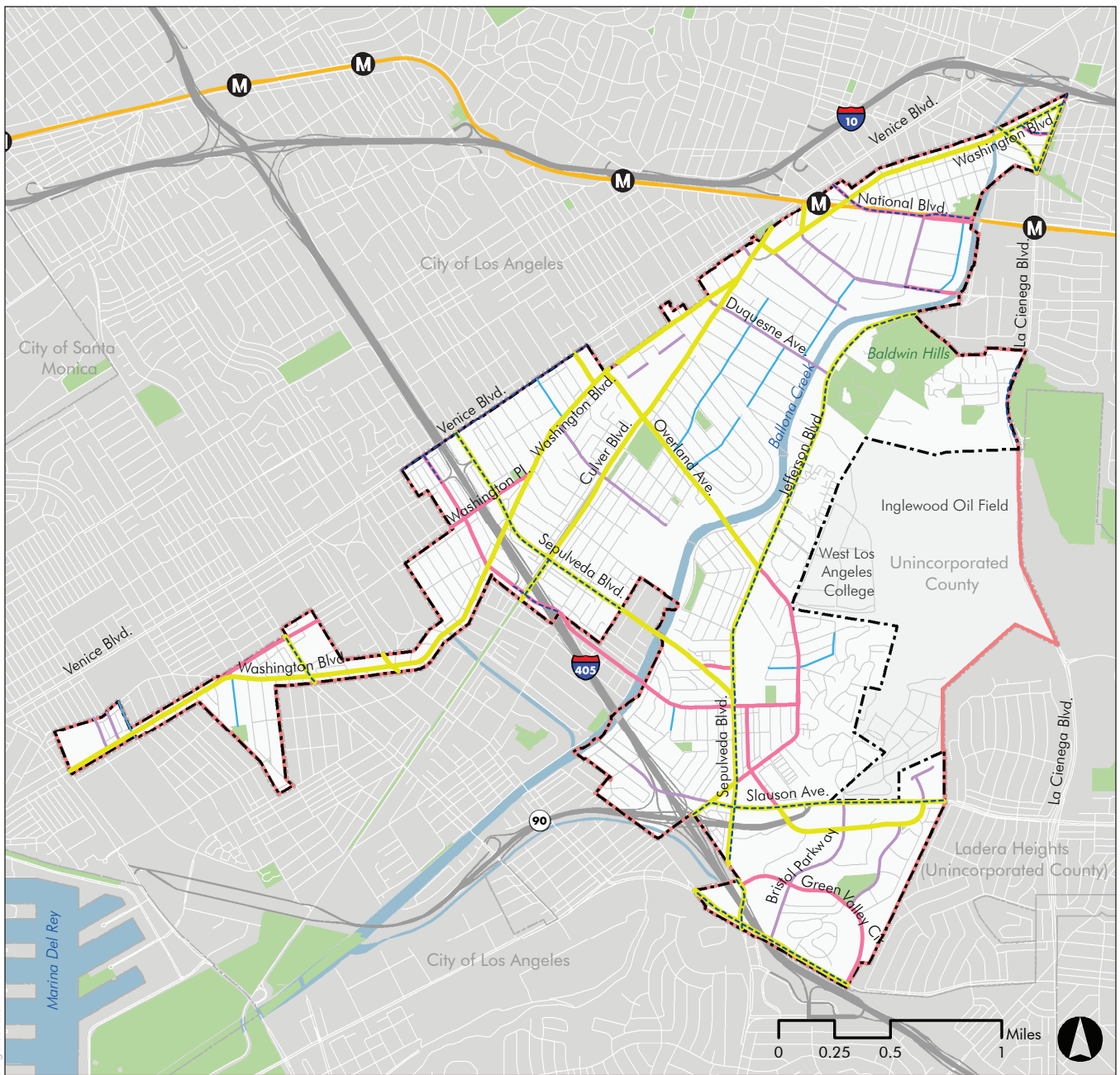
**TABLE 2-5
SPECIAL ROADWAY CLASSIFICATIONS**

Classification	Configuration/Guidelines	Modal Priority
Truck Route (Existing)	Threshold based on access / egress routes to ports and State of California Truck Route Network interstates / freeways or local needs for moving commercial goods	n/a
Active Transportation Corridor (New)	Thresholds to implement active transportation infrastructure and safety treatments consider local factors, such as: <ul style="list-style-type: none"> • High pedestrian and/or bicycle volume counts • High collision and fatality rates 	Vehicle: Med Transit: Med Bicycle: High Pedestrian: High
Transit Priority Corridor (New)	Thresholds to implement transit priority treatments consider local factors, such as: <ul style="list-style-type: none"> • High frequency transit service and use • High transit delay due to congestion • Future mobility patterns and demands • Adjacent land uses, including Transit Oriented Community (TOC) objectives • Regional high-capacity transit investments • Transit priority corridor or bus rapid transit corridor as identified in regional plans and studies 	Vehicle: Med Transit: High Bicycle: Med Pedestrian: High to Med
Car-Free Zones (Vacated Streets) (New)	Thresholds for vacating automobiles from roadways (and segments of roadways) consider alternative mobility network connectivity and accessibility, including the proximity of: <ul style="list-style-type: none"> • Transit Priority Corridors • Active transportation Corridors • TOC and Transit Oriented Development (TOD) improvements 	Vehicle: n/a Transit: Med Bicycle: High Pedestrian: High















SOURCE: City of Culver City, Draft Mobility Element, Raimi + Associates, 2023. "Other" considerations may include provisions for parking, median, access management issues, etc.

Parks, Recreation, and Public Facilities

The Parks, Recreation, and Public Facilities Element includes goals and policies related to improvements the City can undertake to improve access, amenities, and funding for the park and recreational resources within the Planning Area. The City maintains and operates two community parks, seven neighborhood parks, and five parkettes/mini parks within City limits along with approximately 700 acres of other outdoor recreational spaces within the Planning Area including public plazas, parks and recreation areas owned by other agencies, joint use facilities, and privately owned public open spaces. The City’s park service standard aims to provide 10 acres of park space per 1,000 residents. More specifically, 1 acre per 1,000 residents may be satisfied with joint use agreements with the CCUSD and 6 acres per 1,000 residents may be satisfied by regional parks, leaving at least 3 acres per 1,000 residents to be satisfied by City-owned parks.



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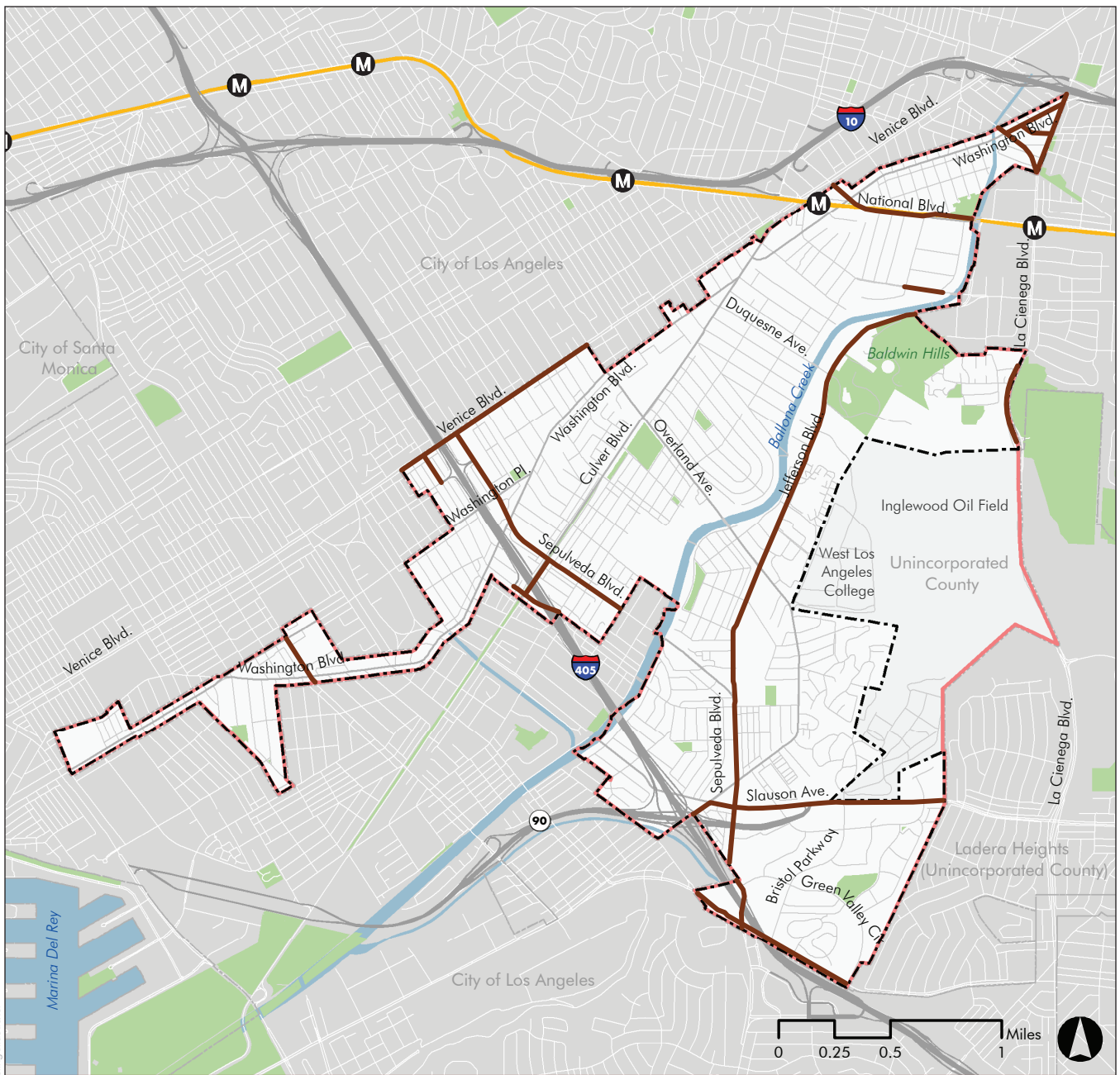
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|-------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------|
|  | City Limits | Future Roadway Network & Classification |
|  | Sphere of Influence |  Primary Arterial |
|  | Metro Station |  Secondary Arterial |
|  | E Line (Expo) |  Major Collector |
|  | Major Roads |  Minor Collector |
|  | Local Roads |  Local Street |
|  | Parks and Open Space |  Truck Route |
|  | Waterbody | |

SOURCE: Draft Mobility Element, 2023

Culver City General Plan 2045

Figure 2-7
Roadway Network & Classification Map





- City Limits
 - Sphere of Influence
 - Metro Station
 - E Line (Expo)
 - Major Roads
 - Local Roads
 - Parks and Open Space
 - Waterbody
- Corridors Supporting Goods Movement**
- Truck Route

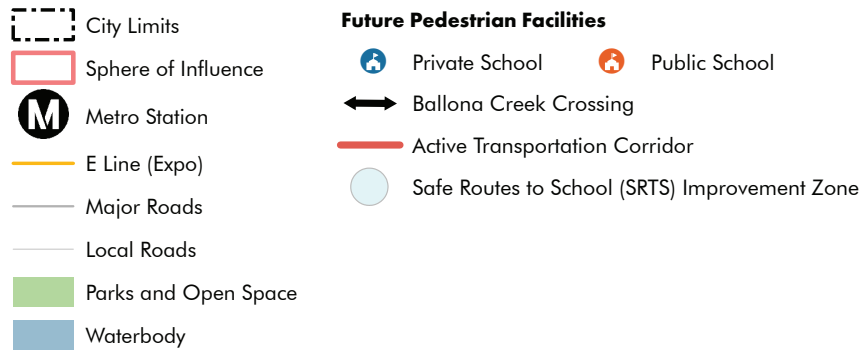
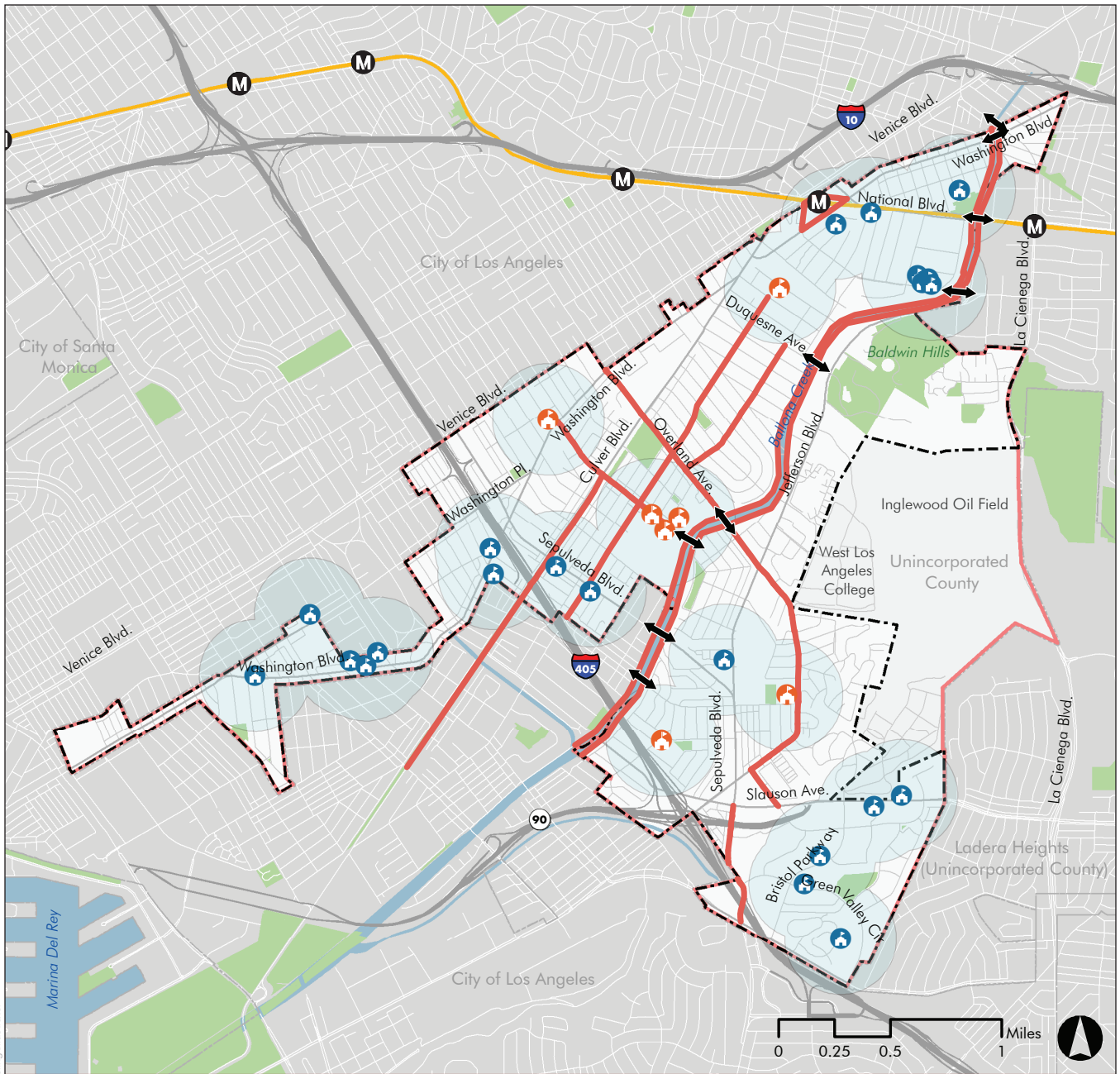
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SOURCE: Draft Mobility Element, 2023

Culver City General Plan 2045

Figure 2-8
Truck Route Network





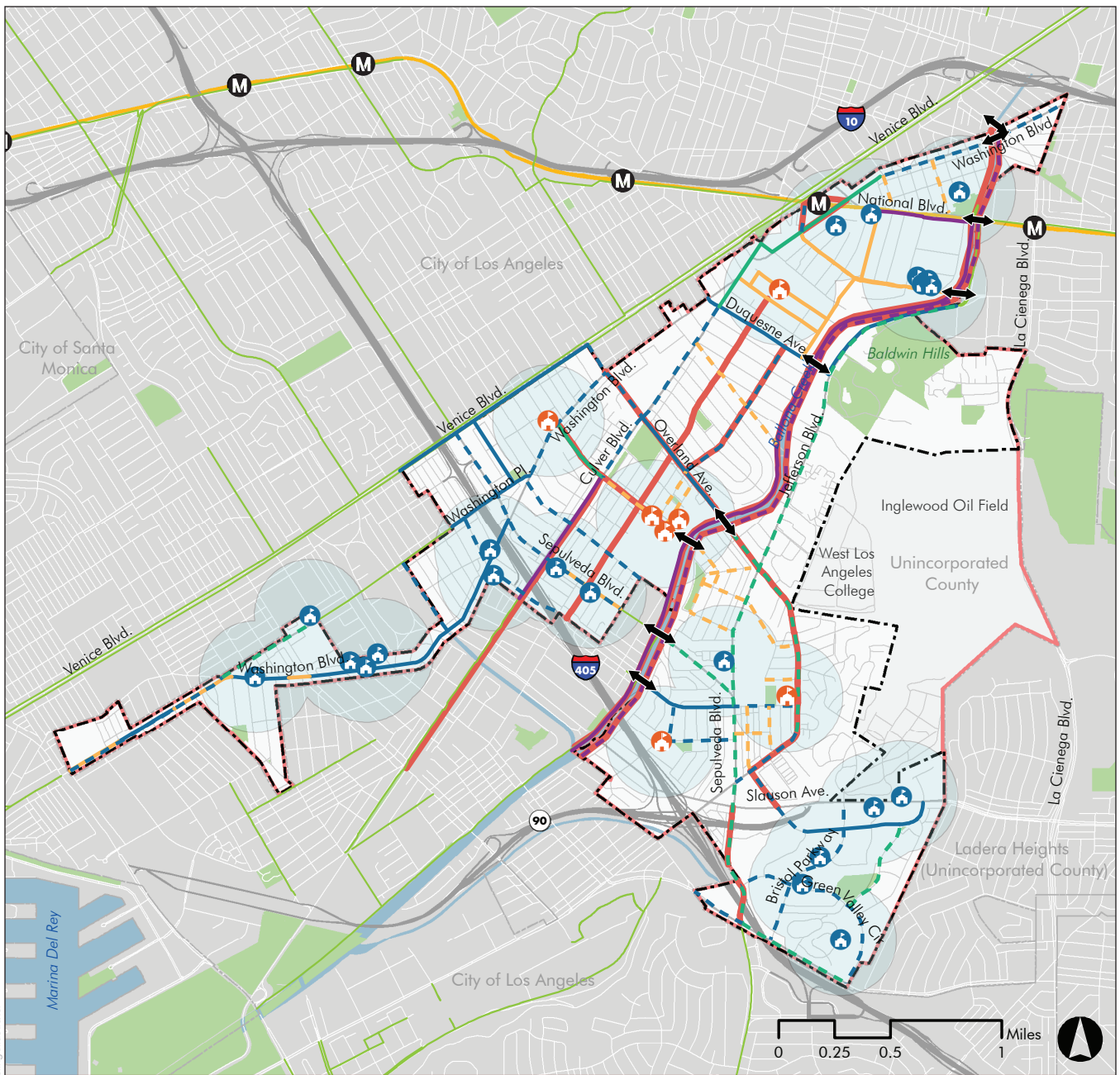
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SOURCE: Draft Mobility Element, 2023

Culver City General Plan 2045

Figure 2-9
Pedestrian Network





- | | | | |
|----------------------|--------------------------------------|--------------------------------------|-----------------------------------------------|
| City Limits | Private School | Public School | Ballona Creek Crossing |
| Sphere of Influence | Existing Regional Bicycle Facility | Active Transportation Corridor | Safe Routes to School (SRTS) Improvement Zone |
| Metro Station | Existing Class I: Bike Path | Proposed Class I: Bike Path | |
| E Line (Expo) | Existing Class II: Bicycle Lane | Proposed Class II: Bicycle Lane | |
| Major Roads | Existing Class III: Bicycle Route | Proposed Class III: Bicycle Route | |
| Local Roads | Existing Class IV: Separated Bikeway | Proposed Class IV: Separated Bikeway | |
| Parks and Open Space | | | |
| Waterbody | | | |

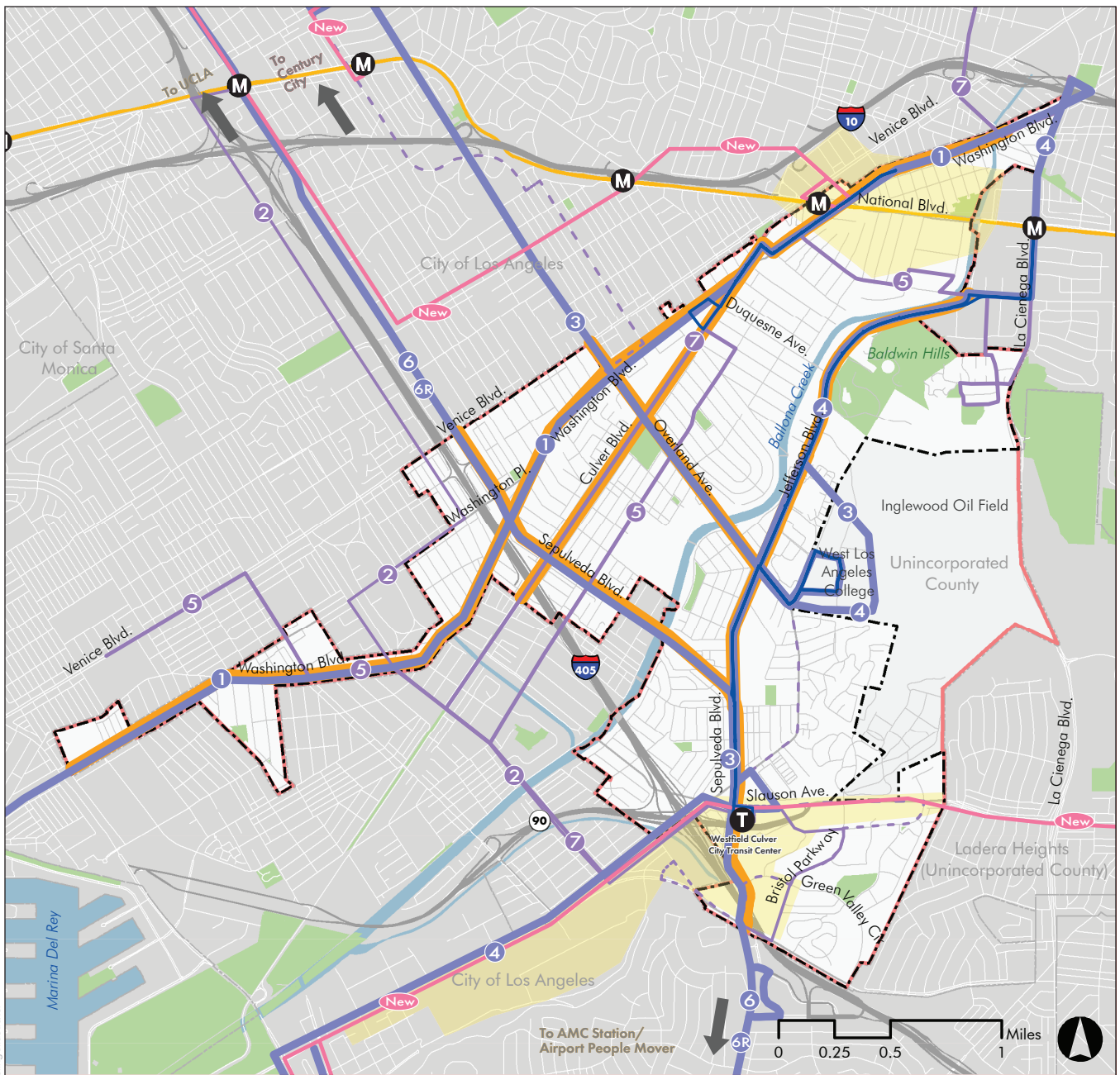
* Bicycle network includes other forms of transportation vehicles such as scooters, e-bikes, etc.

SOURCE: Draft Mobility Element, 2023
















Culver City General Plan 2045

Figure 2-10
Bicycle Network





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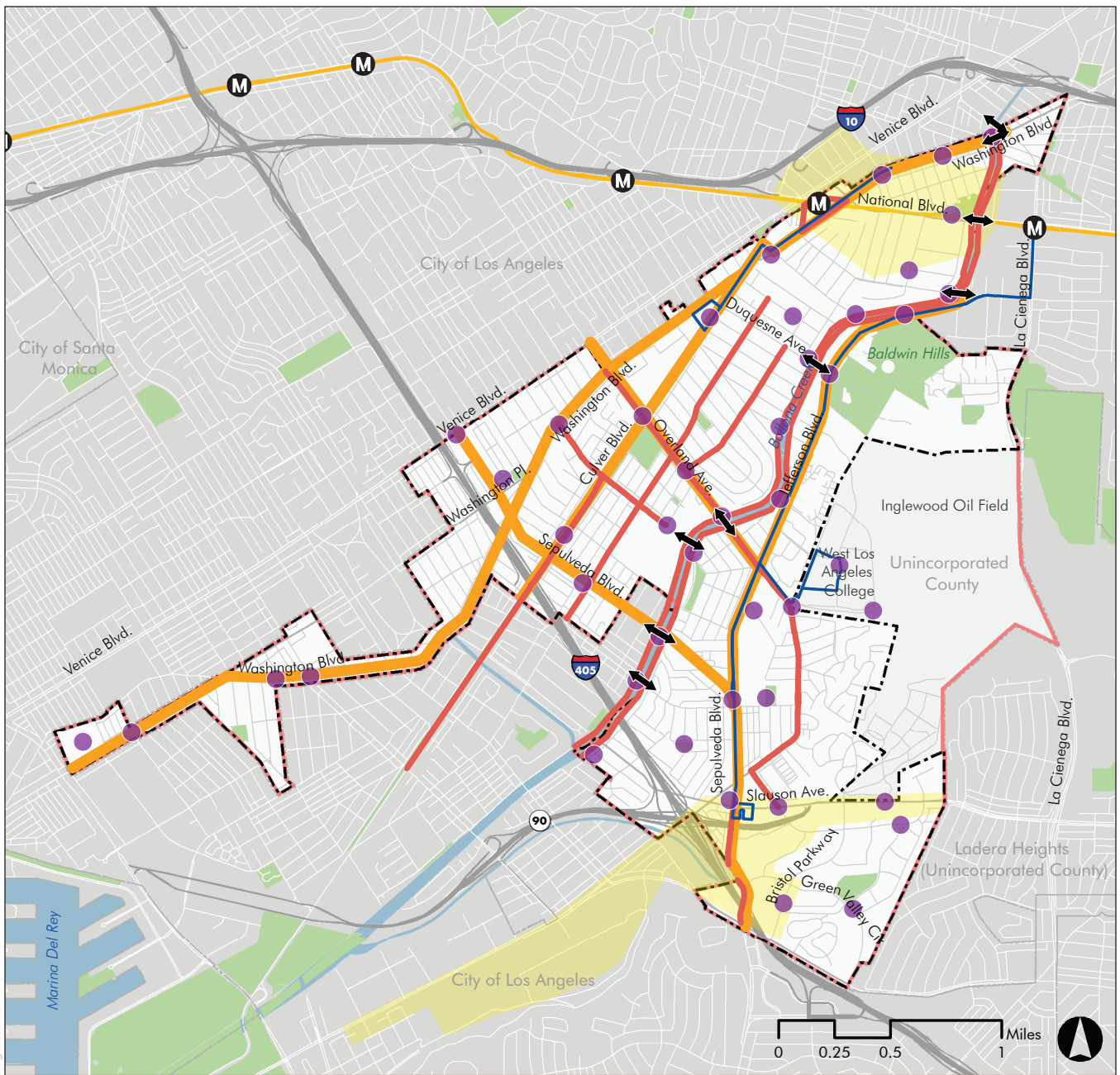
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|  City Limits | Future Fixed-Route Transit and HCT Improvements |
|  Sphere of Influence |  Existing (2020) CityBus route to maintain in the future |
|  Metro Station |  Existing (2020) CityBus route proposed for improved frequency |
|  E Line (Expo) |  Existing (2020) CityBus route proposed for future realignment |
|  Major Roads |  New CityBus route |
|  Local Roads |  Transit Priority Corridor |
|  Parks and Open Space | Circulators |
|  Waterbody |  Downtown and Jefferson Circulators |
| | Microtransit |
| |  Service Areas |

SOURCE: Draft Mobility Element, 2023

Culver City General Plan 2045

Figure 2-11
Transit Network





- | | |
|----------------------|------------------------------------|
| City Limits | Emerging Mobility Network |
| Sphere of Influence | Mobility Hub* |
| Metro Station | Microtransit Service Area |
| E Line (Expo) | Ballona Creek Crossing |
| Major Roads | Downtown and Jefferson Circulators |
| Local Roads | Active Transportation Corridor |
| Parks and Open Space | Transit Priority Corridor |
| Waterbody | |

*Mobility Hub typologies (level of capital and service investments) have not been determined yet.

SOURCE: Draft Mobility Element, 2023

Culver City General Plan 2045

Figure 2-12
Emerging Mobility Network



The Parks, Recreation, and Public Facilities Element establishes policies to reduce inequities for residences within one half mile walking distance of a park or recreational facility, plans for parks and other outdoor recreational spaces in these neighborhoods, and establishes a performance metric to track the percentage of population within walking distance of a park. Implementation of the General Plan 2045 as well as adoption and continual updates to the City's Park and Recreation Master Plan (PRMP) would provide direction and resources to make improvements to park and recreational resource quantity, quality, and access. The City has identified locations for planned or proposed trails and recreational facilities throughout the Planning Area, as shown in **Figure 2-13, Planned and Proposed Park and Recreational Facilities**.

The Parks, Recreation, and Public Facilities Element also includes goals and policies related to the provision of public facility, library, and school services when taking into account the anticipated population growth through 2045.

Infrastructure

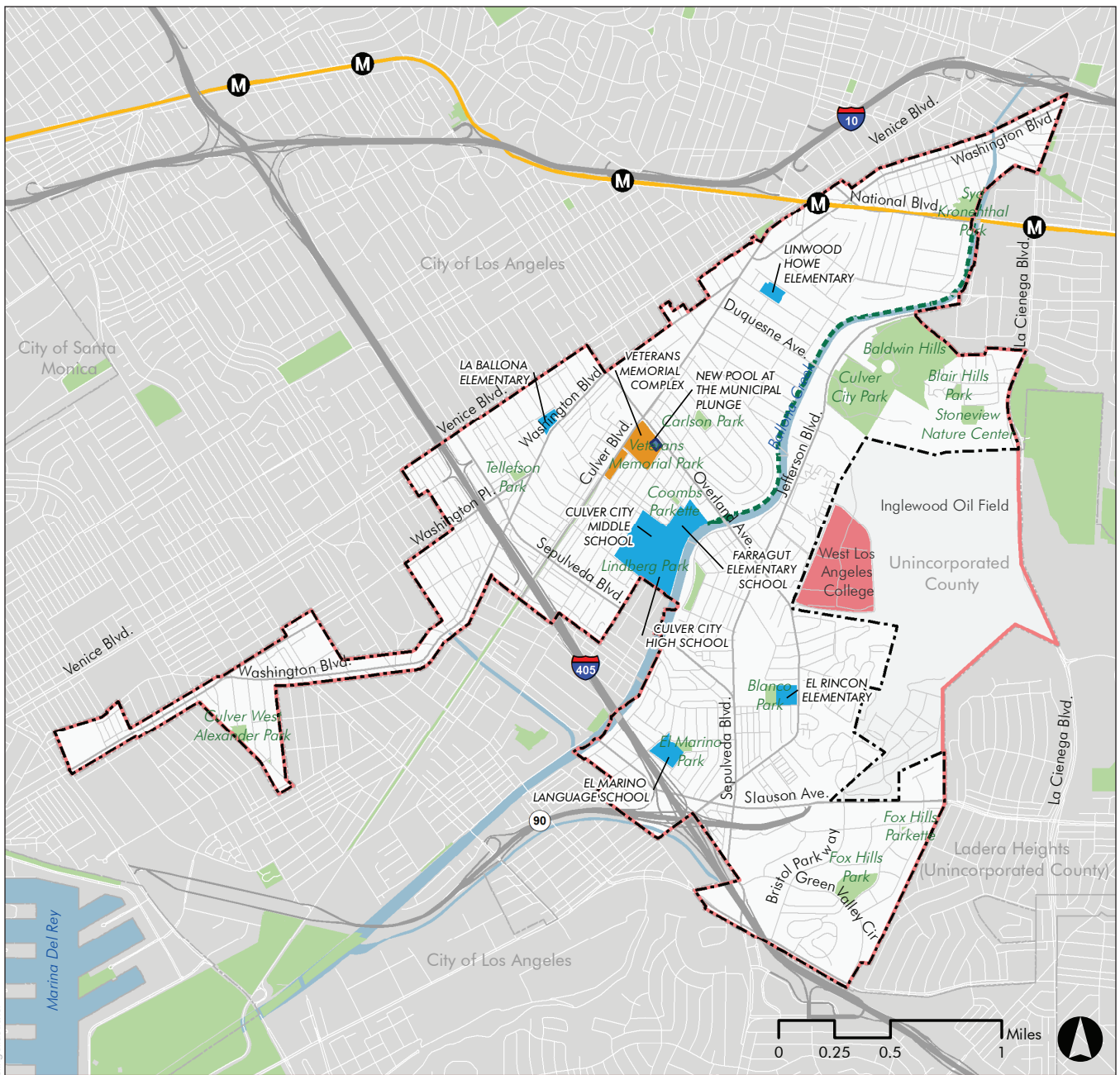
The Infrastructure Element includes goals and policies that seek to ensure adequate infrastructure is provided, maintained, and expanded, to accommodate the growth projected for the Planning Area by 2045. This element addresses potable water, wastewater, stormwater drainage, and electricity and natural gas. Increased potable water demands to service the projected population growth translates to increased wastewater treatment flows. Therefore, the Infrastructure Element includes policies to reduce potable water use through conservation efforts and implementing greywater or blackwater treatment and reuse as there is currently no recycled water network in the city. Other policies in the Infrastructure Element include best practices for both small parcel and larger district scale stormwater management and groundwater recharge for stormwater infrastructure and the City's transition to all-electric systems and provision of building scale solar for energy infrastructure.

Greenhouse Gas Reduction

The Greenhouse Gas Reduction Element includes goals and policies that address sustainability including greenhouse gas emissions, landfill disposal, water efficiency, and transportation. This element also includes goals and policies related to adaption and resiliency planning. As part of this element, a GHG emissions inventory was prepared in 2019 in order to track the city's GHG emissions, set a baseline, and identify reductions needed to align with statewide targets.

Conservation

The Conservation Element provides goals and policies for the protection and preservation of cultural resources, including archaeological, and historic resources, paleontological resources, as well as biological resources, water resources, air quality, and mineral resources. The goals and policies of the Conservation Element also direct the city's activities related to restoration of the IOF and revitalization of Ballona Creek as a recreational corridor. These policies will serve to protect and conserve environmental features within the City during implementation of Project.



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- City Limits
- Sphere of Influence
- M Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Trails
- Ballona Creek Trail Extension
- Joint Use Facilities**
- CCUSD Facilities
- West Los Angeles College
- The Municipal Plunge**
- New lesson pool and upgrade
- Veterans Memorial Complex**
- Bridging the aquatics center to the Teen Center

SOURCE: Draft Parks, Recreation, and Public Facilities Element, 2023

Culver City General Plan 2045

Figure 2-13
Planned and Proposed Park and Recreational Facilities



Safety

The Safety Element addresses natural and human-made hazards by providing goals and policies that proactively advance community resilience. The Safety Element identifies actions that promote safety and reduce risks from natural and human-made hazards and climate change, while also ensuring an effective response and recovery from adverse events. The Safety Element also incorporates by reference the City’s Multi-Jurisdictional Hazard Mitigation Plan, which addresses evacuation planning in accordance with Assembly Bill (AB) 747. The Safety Element identifies potential environmental hazards that may be exacerbated by implementation of the Project and provides goals and policies to address those hazards such as seismic hazards, geologic hazards, flooding, wildfire, climate change, hazardous materials, aging buildings, and critical facilities.

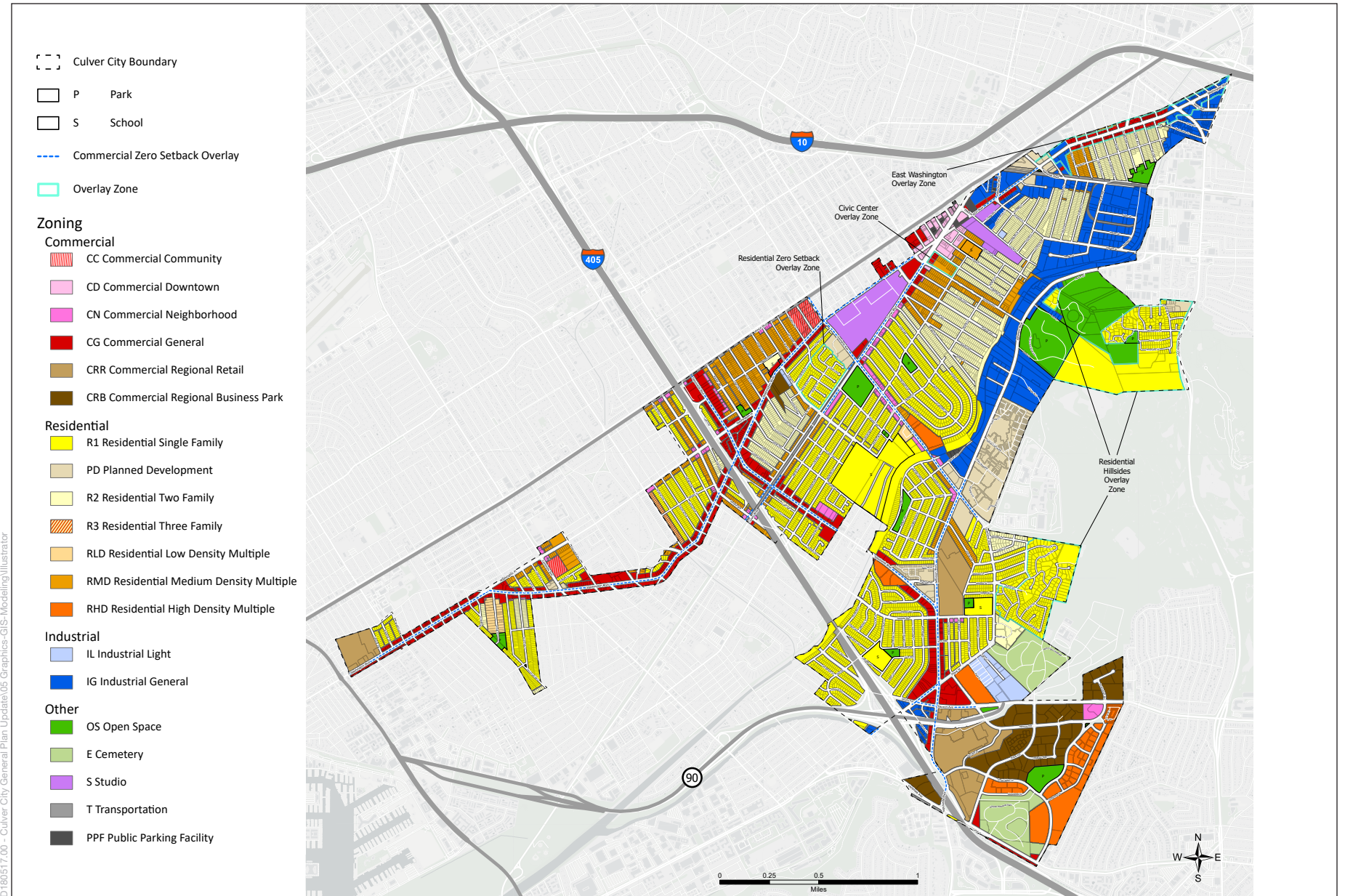
Noise

The Noise Element sets goals and policies that ensure that noise and vibration from various sources, including construction, traffic, and stationary equipment, do not create an unacceptable noise and vibration environment. As the Land Use and Community Design Element lays out the plan for development and redevelopment within the city, these patterns contribute to construction noise and stationary noise sources from operation of certain land uses. In conjunction with the Mobility Element, the circulation pattern for the Planning Area also contributes to noise from mobile sources. The Noise Element includes goals and policies to ensure noise and vibration from both mobile and stationary sources preserve a peaceful noise environment within neighborhoods and have minimal impacts to structures, people, and equipment.

2.4.2 Zoning Code Update

The Zoning Code provides the mechanism to ensure that the goals and policies in the City’s General Plan are implemented through the development that occurs throughout the City over time. California Government Code Section 65860(a) requires that a jurisdiction’s zoning ordinance be consistent with its General Plan or any updates to its General Plan. **Figure 2-14, Existing Zoning Map**, shows the distribution of the existing zoning districts. These districts are associated with the adopted General Plan land use designations.

In light of the proposed changes in the General Plan 2045, updates to the Zoning Code are necessary for consistency with the land use designations in the General Plan 2045. The proposed Zoning Code Update would implement the new vision in the General Plan 2045, changing from single-use commercial and industrial districts to mixed-use zones. Thus, the Zoning Code Update would implement the new land use designations that are in the General Plan 2045. **Table 2-6, Zoning Code Framework – Uses and Development Standards**, shows the associated General Plan 2045 land use designations, the proposed zoning districts, and the associated existing zoning district. **Figure 2-15, Proposed Zoning Map**, shows the distribution of the proposed zoning districts.



SOURCE: City of Culver City, July 2023

Culver City General Plan 2045

Figure 2-14
Existing Zoning Map

**TABLE 2-6
ZONING CODE – USES AND DEVELOPMENT STANDARDS**

General Plan Designation	Implementing Zone	Max Density/FAR	Max Height*	Existing Zone (changes)
Residential				
Single Family	Single Family (R1)	8.7 du/acre 0.45 FAR	Flat roofs: 27 ft Sloped roofs: 30 ft	R1 (reduced residential FAR)
Two Family	Two Family (R2)	17.4 du/acre	30 ft	R2 (no expected change)
Low Density Multifamily	Low Density Multifamily (RLD)	35 du/acre	32 ft	R3, RLD, RMD (increased max density from 26–29 du/acre to 35 du/acre, height from 30 to 32 ft)
Medium Density Multifamily	Medium-Density Multifamily (RMD)	50 du/acre	48 ft	RHD (increased max density from 29 du/acre to 50 du/acre, height from 40 to 48 ft)
High Density Multifamily	High Density Multifamily (RHD)	70 du/acre	56 ft	New zone
Mixed Use				
Mixed Use Corridor 1	Mixed Use Neighborhood (MU-N)	35 du/acre 2.0 FAR	43 ft	CN (no change in height)
Mixed Use Corridor 1	Mixed Use Corridor 1 (MU-1)	35 du/acre 2.0 FAR	56 ft	CN, CG (height increased from 43– 56 ft to 56 ft)
Mixed Use Corridor 2	Mixed Use Corridor 2 (MU-2)	50 du/acre 3.0 FAR	56 ft	CN, CG, IL (height increased from 43– 56 ft to 56 ft)
Mixed Use				
Mixed Use Medium	Mixed Use Downtown (MU-DT)	65 du/acre 3.0 FAR	56 ft	CD (height increased from 30–56 ft to 56 ft)
Mixed Use Medium	Mixed Use Medium (MU-MD)	65 du/acre 3.0 FAR	56 ft	CN, CG, CD, CC, CRB (height increased from 30–56 ft to 56 ft)
Mixed Use High	Mixed Use High (MU-HD)	100 du/acre 4.0 FAR	56 ft	CRB, CRR (height increased from 30– 56 ft to 56 ft)
Mixed Use Industrial	Mixed Use Industrial (MU-I)	65 du/acre 3.0 FAR	56 ft	IG (height increased from 43 to 56 ft)
Special Purpose				
Studio	Studio (S)	Varies, maximum established by project	56 ft	Studio (No change)
Institutional	Institutional (I)	4.0	56 ft	Not in existing code
Open Space	Open Space (OS)	0.5	56 ft	Open Space (No change)
Cemetery	Cemetery (E)	0.5	N/A	Cemetery (No change)
Transportation	Transportation (T)	0.5	N/A	Transportation (No change)
Various	Planned Development (PD)	N/A	N/A	PD (No change)

* Heights not to exceed 56 feet.

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Residential Uses

- Single Family - 8.7 du/ac
- Two Family - 17.4 du/ac
- Low Density Multifamily - 35 du/ac
- Medium Density Multifamily - 50 du/ac
- High Density Multifamily - 70 du/ac

Mixed Uses

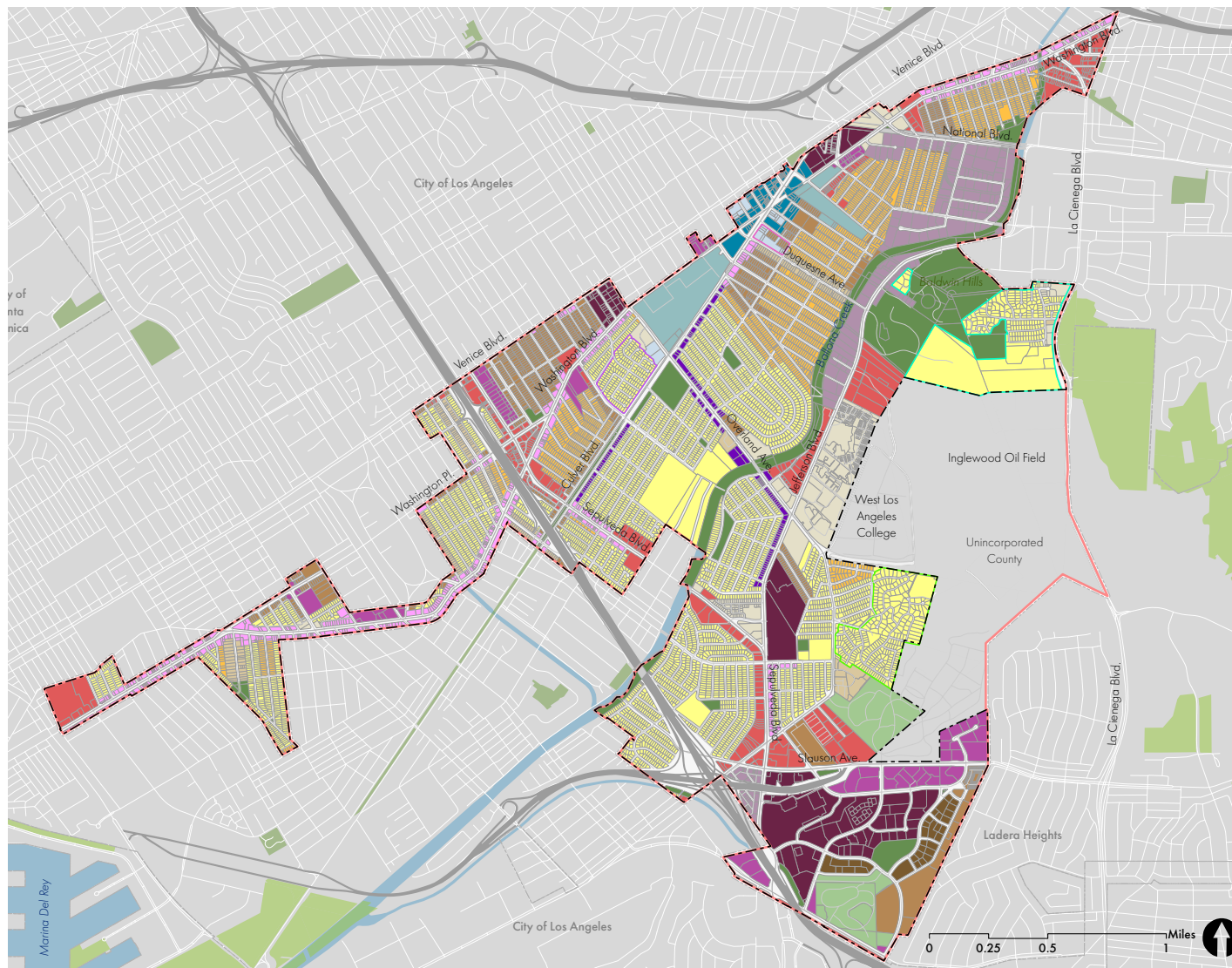
- Mixed Use Neighborhood - 35 du/ac
- Mixed Use Corridor 1 - 35 du/ac
- Mixed Use Corridor 2 - 50 du/ac
- Mixed Use Downtown - 65 du/ac
- Mixed Use Medium - 65 du/ac
- Mixed Use Industrial - 65 du/ac
- Mixed Use High - 100 du/ac

Special Uses

- Planned Development
- Institutional
- Studio
- Open Space
- Cemetery
- Transportation

Overlays

- Residential Hillside Overlay - Culver Crest
- Residential Hillside Overlay - Blair Hills
- Residential Zero Setback Overlay
- Civic Center Overlay
- Waterbody
- City Park
- County and State Park
- City Limits
- Sphere of Influence



SOURCE: City of Culver City, 2024; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 2-15
Proposed Zoning Map



The four existing overlays, Residential Zero Setback Overlay (-Rz), Redevelopment Project Area Overlay (-Rp), Civic Center Overlay (-Cv), and Residential Hillside Overlay (-Rh) would not change. The Commercial Zero Setback overlay (-Cz) and East Washington Boulevard Overlay (-Ew) would be removed.

While the General Plan 2045 provides general characteristics and parameters of each land use designation, the Zoning Code Update would provide more specificity to guide the future development and provide clear parameters for applicants. Specifically, the Zoning Code Update, which would establish the zoning districts associated with each of the land use designations in the General Plan 2045, would provide the specific development standards, including permitted and conditional uses, densities (units per acre),⁷ intensities (floor area ratio or FAR), setbacks, lot coverage, and building heights. The last column in Table 2-6 provides key development parameters in the Zoning Code Update compared with the existing development standards.

The Zoning Code Update would result in five residential zones with varying densities. The Single Family (R1) and Two Family (R2) zones would remain generally the same as in the existing code. The multifamily residential zones would allow more density and increased building heights. The increase in density is necessary in order to implement the Housing Element and achieve the housing development to meet the 6th cycle RHNA allocation as well as future allocations.

The commercial and industrial areas would change from buildings with commercial or industrial uses to mixed-use developments. There would be a total of seven mixed use zones, which would allow residential uses at varying levels of density. The Zoning Code Update would introduce floor area ratio to regulate the intensity of nonresidential development. The Zoning Code Update would retain five existing special purpose zones and would add an Institutional zone.

As can be seen in Table 2-6, while the allowable building height would be increased in some zoning districts, the maximum height in the City would be 56 feet. Some areas that would have an increase in allowable building height include Mixed Use Industrial zoned properties in the Hayden Tract, some properties along Jefferson Boulevard that are zoned Mixed Use Industrial and Mixed Use Corridor 2. In addition, some parcels in the Fox Hills neighborhood that would be zoned High Density Multifamily would have allowable height limits of up to 56 feet, which is greater than current allowable heights. Also, some properties zoned Medium Density Multifamily in the Washington Culver neighborhood would have 48-foot height limits, which is greater than the current height limit in the area. However, as is currently the case, the maximum height for this zone in the Zoning Code Update would be limited to 56 feet. Exemptions to the 56-foot maximum height would still be allowed for future development that complies with the state's density bonus law as determined during the project review process or with the height exception process described in the Zoning Code.

⁷ While the City is considering establishing a minimum density, the projections for the General Plan 2045 are used for analyses in this PEIR. If established, a minimum density would not affect the analyses contained in this document.

In addition, the Zoning Code Update would implement recent state laws related to various housing requirements. Finally, the Zoning Code Update would address streamline review processes for future development applications.

2.5 Project Implementation

2.5.1 Required Permits and Approvals

The Project will require a recommendation from the Planning Commission to the City Council regarding certification of this PEIR and adoption of the General Plan 2045 and Zoning Code Update. The City Council will take the final actions on the Project. Future, subsequent development under the Project may require approval of federal, state, and responsible or trustee agencies that may rely on this PEIR for decisions in their areas of expertise.

2.5.2 Decision-Making Agencies

The Project sets high-level goals and policies to be used during the decision-making process when determining City priorities and during review of individual development proposals. The Zoning Code Update, in compliance with California Government Code Section 65860(a), would be consistent with the General Plan 2045. Implementing the Project is the responsibility of the City Council, the Planning Commission, other City boards, committees and commissions, and City departments, as follows:

- City Council
- Planning Commission
- Planning and Development Department
- Public Works Department
- Transportation Department
- Additional City advisory committees, boards, and commissions

Details on their powers and duties are in the City’s Municipal Code. The City will also need to consult with the County of Los Angeles and other public agencies about implementation proposals that affect their respective areas of jurisdiction.

2.5.3 Implementation Tools

The Project will be implemented through a variety of methods, including government programs initiated by the City, review of independent development proposals, and decisions made by the various City commissions, departments, and the City Council. Additional project specific environmental documents may be needed to evaluate site-specific environmental impacts in coordination with state and CEQA law.

CHAPTER 3

Environmental Setting

3.1 Overview of the Environmental Setting

CEQA Guidelines Section 15125 requires that an EIR include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the NOP is published, or if no NOP is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. This chapter provides a general overview of the environmental setting for the Project. However, detailed information on existing conditions is provided for each environmental topic evaluated in Chapter 4, *Environmental Impact Analysis*. This chapter also provides a discussion regarding cumulative impacts analysis that is required in CEQA Guidelines Section 15130(a).

As described in Chapter 1, *Introduction*, the NOP for the Project was published on March 1, 2022, and a Recirculated NOP was published on February 15, 2024, in order to include the proposed Zoning Code Update to maintain compliance with the recently adopted housing element and comply with state law. Due to the long-term planning nature of a comprehensive General Plan Update, the environmental analysis commenced in 2019 and the information presented in the NOP and supporting Initial Study was based on existing conditions reports prepared in 2019.¹ Therefore, for analytic purposes in this Draft PEIR, the baseline year established for existing conditions is 2019 unless otherwise noted and the horizon year representing future conditions is 2045. In cases where current data is not available, the most recent known data is used to depict baseline conditions.

3.1.1 Existing Conditions

The approximately 3,910-acre Planning Area is comprised of two areas: the incorporated City of Culver City (3,280 acres) and the City's Sphere of Influence (SOI) within unincorporated Los Angeles County (630 acres). Primary regional access is provided by three freeways; the San Diego Freeway (I-405), which runs north–south in the western part of the city, the Santa Monica Freeway (I-10) which runs east–west, north of the city boundary and, the Marina Freeway (SR-90) which runs east–west in the western part of the city.

¹ Existing conditions reports were developed to provide a baseline understanding of the existing conditions in Culver City as of the year 2019. These reports were published in Summer and Fall of 2020 and cover topics including: Mobility and Transportation; Socioeconomic Profile and Market Analysis; Land Use and Community Design; Environmental Background; Housing; Arts and Culture; Parks, Public Facilities, and Public Services; Infrastructure; Smart Cities; Climate Hazards; Community Health and Environmental Justice; and Greenhouse Gas Inventories. The existing conditions reports are available on the City's website: <https://www.pictureculvercity.com/resources>.

The Planning Area is currently largely developed with mostly residential uses, followed by commercial development, with other industrial and institutional uses as well. A large portion of the open space within the Planning Area is currently occupied by the Inglewood Oil Field (IOF).

The Planning Area is located approximately 1.5 miles from the Pacific Ocean and is relatively flat with areas of rolling hills that vary in elevation from 40 feet above mean sea level (amsl) in the western portion of the Planning Area to approximately 100 feet amsl in the central portion of the Planning Area. Baldwin Hills, located in the northeastern portion of the Planning Area, is the highest area within the Planning Area rising to above 400 feet amsl.

3.1.2 Surrounding Uses

The Planning Area is located within the western area of Los Angeles County, bounded by the City of Los Angeles to the north, west, and south, and unincorporated Los Angeles County to the east. Areas within the City of Los Angeles surrounding the Planning Area are largely developed with residential and commercial land uses. Areas within unincorporated Los Angeles County to the southeast of the Planning Area are developed largely with residential uses. Areas east of the SOI within unincorporated county include West Los Angeles College, undeveloped and open space lands east of La Cienega Boulevard including the Kenneth Hahn State Recreation Area, and other oil and gas plant areas located within Baldwin Hills.

3.2 Adopted General Plan and Zoning

3.2.1 Adopted General Plan Land Use Designations

The adopted General Plan consists of nine elements and their respective objectives, goals, policies, and implementation measures, which have been individually updated over the years since it was first adopted. Each of the nine elements include: Land Use (amended through 2004); Circulation (amended through 2004); Housing (adopted 2022); Open Space (adopted 1995); Noise (adopted 1995); Conservation (adopted 1973); Seismic (adopted 1974); Public Safety Element (adopted 1995); and Recreation (adopted 1968).

The adopted General Plan Land Use Element and accompanying Land Use Map provide the basis for the current land use designations and distribution in the City, which are shown in Figure 2-4, *Existing General Plan Land Use Map*. As shown in Figure 2-4, the City consists of 18 land use designations: 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, and Institutional. Three focuses special study areas are also included for Blair Hills/Baldwin Hills Area, Hayden Industrial Tract, and Ballona Creek. The largest land use designation in terms of land area is Low Density Single Family, with Open Space occupying the second largest. Table LU-1 of the adopted Land Use Element shows a development potential of 571 additional housing units, for a total of 18,466 housing units. Table LU-3 of the adopted Land Use Element shows a development potential of 2,508,200 square feet of non-residential area for a total of 22,823,489 square feet of non-residential area.

Land use changes and consistency with local, regional, and state policies and plans are discussed in Section 4.10, *Land Use and Planning*.

3.2.2 Current Zoning

The Culver City Zoning Code (Title 17 of the Culver City Municipal Code) provides the basis for current zoning in the City. The City's Zoning Map has 5 base zoning districts: residential, commercial, industrial, planned development, and special purpose; and 6 overlay zoning districts for residential and commercial setbacks, redevelopment areas, civic center, East Washington, and residential hillsides.

Reflecting the adopted general plan designations, the zoning designations that occupy the majority of the City include Single-Family Residential (R1) and Open Space (OS).

3.3 Cumulative Projects

CEQA Guidelines Section 15130(a) states that an EIR shall “discuss the cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” The CEQA Guidelines define cumulative impacts as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines Section 15355 further states that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects.

CEQA Guidelines Section 15130 allows for the use of two different methods to determine the scope of projects for the cumulative impact analysis:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- **Projections Method** – A summary of projections contained local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis provided in this Draft PEIR is based on the Projections Method. The Project consists of the General Plan 2045 and Zoning Code Update. Consistent with CEQA Guidelines Section 15130(b)(1)(B), this Draft PEIR analyzes the environmental impacts of development in accordance with the proposed Draft Land Use Plan (see Figure 2-6, *Draft General Plan Land Use Map*). As a result, this Draft PEIR addresses the cumulative impacts taking into account growth from the General Plan 2045 in the Planning Area, in combination with impacts from projected growth throughout the whole of Los Angeles County and the surrounding region, as forecasted in the adopted SCAG regional projections.

The cumulative analyses for each environmental issue are provided in their applicable sections in Chapter 4, *Environmental Impact Analysis*, of this Draft PEIR.

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CHAPTER 4

Environmental Impact Analysis

4.0 Introduction to the Analysis

4.0.1 Introduction

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

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Sections 4.4)
- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Land Use and Planning (Section 4.10)
- Mineral Resources (Section 4.11)
- Noise (Section 4.12)
- Population and Housing (Section 4.13)
- Public Services (Section 4.14)
- Recreation (Section 4.15)
- Transportation (Section 4.16)
- Tribal Cultural Resources (Section 4.17)
- Utilities and Service Systems (Section 4.18)
- Wildfire (Section 4.19)

Based on the Initial Study, which is contained in Appendix A of this Draft PEIR, public comments received during the NOP circulation period, the Recirculated NOP period, and input received

during the Draft PEIR Scoping Meetings, it was determined that one issue area, Agriculture and Forestry Resources, would not be subject to potentially significant impacts due to implementation of the Project. There are a few questions within issue areas, such as air quality, biological resources, and noise, in which a particular question was evaluated in the Initial Study and it was determined that no further analysis was necessary. Please see Chapter 6, Other CEQA Considerations, of this Draft PEIR for a discussion of the issue areas for which a detailed analysis is not included and the basis for that determination.

4.0.2 Format of the Environmental Impact Analysis

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

- **Environmental Setting:** This subsection describes the physical characteristics and existing environmental conditions within and in the vicinity of the Planning Area.
- **Regulatory Framework:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from federal, State, regional, and local levels are discussed as appropriate.
- **Thresholds of Significance:** This subsection presents the criteria established by the Lead Agency to identify at what level an impact would be considered significant thereby requiring implementation of mitigation measures.
- **Methodology:** This subsection provides a description of the methodology used for the analysis of the environmental issue addressed in the section.
- **Project Impact Analysis:** This subsection provides an analysis of the nature and extent of potential Project impacts. These analyses address direct (or primary) effects of the Project as well as the indirect (or secondary) impacts, as necessary. This subsection also provides applicable proposed General Plan Goals and Policies that may reduce or eliminate Project impacts.
- **Mitigation Measures:** This subsection provides mitigation measures, if necessary, to reduce or eliminate significant impacts identified in the analysis of Project impacts.
- **Level of Significance after Mitigation:** A discussion of the significance of each impact after mitigation is provided.
- **Cumulative Impacts:** A discussion of the effects of the Project when combined with the effects of cumulative projects, which include the cumulative projections for the region. The approach to addressing cumulative impacts, using the projection approach, is described in Chapter 3, *Environmental Setting*, of this Draft PEIR.

4.0.3 Terminology Used in this PEIR

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

- **Threshold of Significance:** A threshold of significance is a criterion applied by the Lead Agency to identify significant adverse environmental impacts. A threshold is defined by a

Lead Agency based on guidance found in CEQA or the CEQA Guidelines, scientific and factual data relative to the Lead Agency jurisdiction, views of the public in affected areas, the policy/regulatory environment of affected jurisdictions, and other factors.

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

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

- Avoiding the impact by not taking a certain action or parts of an action;
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and,
- Compensating for the effect by replacing or providing substitute resources or environments.

If mitigation measures are necessary, the mitigation measures will be included in a Mitigation Monitoring and Reporting Program (MMRP). The MMRP will be adopted by the City to ensure that the implementation of the mitigation measures can be tracked by the City to ensure compliance.

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4.1 Aesthetics

4.1.1 Introduction

This section provides an analysis of the potential environmental impacts on aesthetics from implementation of the Project, including potential impacts related to scenic vistas, conflicts with applicable zoning and other regulations governing scenic quality, and light and glare. The section provides context regarding the Planning Area's existing visual character and scenic resources, as well as relevant federal, regional, state, and local regulations and programs.

4.1.2 Environmental Setting

The Planning Area is located in the western area of Los Angeles County and is located approximately 5 miles east of the Pacific Ocean, 5 miles north of Los Angeles International Airport (LAX), and 8 miles west of downtown Los Angeles. The 315-acre Kenneth Hahn State Recreation Area borders the Planning Area's eastern boundary and Ballona Creek runs through Culver City in a south-westerly direction from its origin near Cochrane Avenue and Venice Boulevard in the City of Los Angeles ending at the Pacific Ocean. The Planning Area is a highly developed urban environment, which constitutes the majority of the Planning Area's visual character, as discussed in greater detail below.

Scenic Vistas and Viewsheds

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

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 Sphere of Influence (SOI). While the Planning Area does not have any designated scenic vistas, the Blair Hills/Baldwin Hills offer expansive, long-range views as well as view corridors from Playa Street traveling northeast towards Overland Avenue, Elenda Street traveling northwest towards Culver Boulevard, and Jefferson Boulevard traveling south along Ballona Creek. In addition, the State of California's Baldwin Hills Conservancy owns and operates the Baldwin Hills Scenic Overlook, which is within City limits.

Scenic Resources

Scenic resources typically involve prominent, unique, and identifiable natural features in the environment (e.g., trees, rock outcroppings, islands, ridgelines, channels of water, and aesthetically appealing open space) and cultural features or resources (e.g., regional or

architecturally distinctive buildings, or structures that serve as a focal point of interest). Pursuant to CEQA Guidelines Appendix G, this area of consideration includes specific mention of such natural or manmade features when they are located within the viewshed of a state scenic highway.

According to the California State Scenic Highway System Map, there are no designated or eligible state scenic highways in the Planning Area. There are no adopted or eligible state scenic highways nor any designated historic parkways within the Planning Area.¹ However, the stretch of State Route 1 (SR-1) that extends approximately from Venice Boulevard to Ozone Avenue is eligible for designation, which is located approximately 0.75 miles north from the western portion of Culver City.

Visual Character

Visual character is an impartial description of the defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structure and their relationship (or dominance) to one another, and by prominent elements of form, line, color, and texture that combine to define the composition of views. Visual character-defining resources and features within a landscape may derive from notable landforms, vegetation, land uses, building design and façade treatments, transportation facilities, overhead utility structures and lighting, historic structures or districts, or panoramic open space.

The Planning Area consists of Culver City and its SOI, which is an unincorporated area of Los Angeles County located to the east of the City boundary in the Baldwin Hills area. The Planning Area is an urban, developed environment with open space and natural resources with the eastern portion of the Planning Area. Interstate 405 (I-405) runs in a north-south direction in the western part of the Planning Area and I-10 runs in an east-west direction just outside of the Planning Area to the north. State Route (SR) 90 intersects the Planning Area from the west and ends at Slauson Avenue in the Fox Hills neighborhood.

The Planning Area is a mix of residential, commercial, industrial, civic, institutional, park and open space, with associated transportation, and flood control and utility infrastructure. Open space accounts for the second highest amount of land in the Planning Area, with 633 acres or 19.8 percent of the land designated Open Space, although most of this acreage is within the SOI. Natural resources within the Planning Area include over 100 undeveloped acres of Blair Hills that are privately owned. Portions of Culver City Park, which abuts these undeveloped hillsides, also offer some habitat value. Of the Planning Area's privately owned land, the 88 acres of cemetery property and land within and adjoining the public rights-of-way are considered to contribute to the urban design character of the city and are important visual open space resources.²

¹ California Department of Transportation (Caltrans). 2023. California State Scenic Highway System Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed July 2023.

² Culver City, 2004. Culver City General Plan Open Space Element, pg. OS-2. <https://www.culvercity.org/Services/Building-Development/General-Plan>. Accessed June 2023.

The major boulevards and arterial streets that run through Culver City create a pattern of residential, non-residential, and mixed-use districts and include Slauson Avenue, Washington Boulevard, Sepulveda Boulevard, Jefferson Boulevard, National Boulevard, and Culver Boulevard. The parcels that line these corridors vary in size and use and almost all commercial buildings front one of these six corridors. The City's main commercial corridor is Culver Boulevard in Downtown.

Within this framework of corridors and freeways, Culver City has a mix of mostly residential and commercial uses along with industrial and studio uses sprinkled throughout the central and eastern portions of the city. The western portion of the City is comprised of commercial, including regional commercial, and residential uses. The central portion of the City includes industrial and studio uses in addition to commercial and residential uses. Specifically, industrial uses are located along Jefferson Boulevard, adjacent to Ballona Creek, with pockets of industrial uses in the northeastern and central portions of the city and studio uses are located along the northern boundary of the city. Most of the eastern portion of the city includes the Inglewood Oil Field (IOF), which straddles both the city and the SOI, and cemetery use, though there are pockets of residential, office, and industrial uses in this area. Approximately 68 acres of the IOF, or 2 percent of the City's total acreage, is located within the City's boundaries. The other approximately 932 acres of the IOF are located within the SOI, along with designated open space.

Parks, recreational facilities, and open spaces are distributed throughout the city. The largest park facility is Baldwin Hills, which is owned and managed by the State of California through the Baldwin Hills Conservancy. Ballona Creek, a flood control channel, is approximately 9 miles long and runs from Los Angeles through the central portion of Culver City and out to the Pacific Ocean. Ballona Creek provides a unique opportunity to mitigate flooding, restore native ecologies, and serve as a scenic multi-purpose open space and recreational corridor.

Urban form, including street patterns, lot size, lot shape, and building footprints, in the Planning Area vary from neighborhood to neighborhood. This variation in urban form is due in part to the economic eras in which neighborhoods were built. Corridors, activity centers, and neighborhoods shape the city's urban form. Collectively, these components of the built environment reflect the city's history and evolving priorities, needs, and development models.

The city's neighborhoods vary in size, layout, typology, and natural environment. Residential neighborhoods vary in building size and housing type but are largely characterized by small parcels that front two-lane neighborhood streets. With few exceptions, the neighborhood scale is smaller than the scale of development found on the corridors. In addition to the development scale, the design of building street fronts has changed over time. Homes in older neighborhoods typically have large street-facing windows, porches, or stoops, and prominent front doors. In the newer neighborhoods, wide driveways and street-facing garage doors contrast with older homes, where garages were typically set back from, or behind, the house with much narrower driveway aprons. These differences result in varied community character in different neighborhoods.

Light and Glare

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

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

Light and glare sources within the Planning Area are primarily associated with residential, commercial, and industrial land uses. In commercial and industrial areas, security lighting, streetlights, illuminated security and/or wayfinding signage, signs, and parking lots may produce light and highly reflective materials, such as shiny metals or glass, may cause glare at certain times of the day depending on the direction of the sun. In residential areas, streetlights, outdoor and security lighting would be typical light sources and glass might be a source of glare. However, these sources of light and glare are typical for an urban setting and are not considered unique to the Planning Area.

4.1.3 Regulatory Framework

This section provides the relevant state, regional, and local regulations applicable to the Project. There are no federal regulations which apply to the Project.

State

Senate Bill No. 743

Senate Bill (SB) 743, codified within Public Resources Code (PRC) Section 21099 et. seq., states that “Aesthetic (...) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” (PRC Section 21099(d)(1)). Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Pertinent definitions applicable to PRC Section 21099(a) include:

- “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- “Transit priority area” means an area within 0.5 miles of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon

included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

- “Employment center project” means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.
- “Major transit stop” is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Projects that meet the criteria set forth in PRC Section 21099(d), are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of significance related to aesthetics. While the Project does not meet these criteria, future development projects facilitated by the Project could be found exempt from aesthetic findings of significance related to aesthetic impacts if the future project meets the criteria established in PRC Section 21099.

California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, section 260 et seq. The intent of the system is to establish the state’s responsibility for the protection and enhancement of California’s natural scenic beauty by identifying those portions of the state highway system, which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the state’s scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. As indicated previously, there are no State Scenic Highways within the City of Culver City.³

California Historic Parkways

Streets & Highways Code Section 280 regulates the designation and maintenance of the system of California Historic Parkways. To be designated as a Historic Parkway, a freeway must have (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the

³ California Department of Transportation (Caltrans). 2023. California State Scenic Highway System Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed July 2023.

parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, state, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat, or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis. No designated Historic Parkways are located in the City of Culver City.

Regional

Los Angeles General Plan

The Los Angeles County General Plan applies to the SOI within the Planning Area, including the majority of the IOF. The Los Angeles County General Plan Land Use Element outlines the County's Special Management Areas, which are areas requiring additional development regulations to prevent the loss of life and property and protect the natural environment and important resources. Scenic Resources in the unincorporated areas of the County are regulated by Hillside Management Area (HMA) policies as well as the corresponding HMA Ordinance. The County's General Plan also protects ridgelines, scenic viewsheds, and areas along scenic highways. Scenic resources are addressed in greater detail in the Conservation and Natural Resources Element, which seeks to guide the long-term conservation of natural resources and preservation of available open space areas. Specific Scenic Resources policies include protecting ridgelines from incompatible development, encouraging development with a visual relationship to surrounding terrain and vegetation, and prohibiting outdoor advertising and billboards along scenic routes, corridors, and other scenic areas. For impacts related to the IOF, refer to Section 4.11, *Mineral Resources*, of this Draft PEIR.

Local

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) was adopted in 2015 to foster a robust and resilient urban forest. The UFMP articulates a clear vision for the future of Culver City's urban forest based on analysis of the City's historical and existing urban forest, as well as on synthesis of current research, best management practices and community input. The Plan provides guiding principles for both long-term and day-to-day management, comprehensive tree designations, technical standards, and resources for City and community members today and for the future. The UFMP provides recommendations for the City's urban forest as well as a structured framework of five Action Areas and related Strategies to support achievement of this vision. The recommendations also address important functions of the urban forest including wayfinding and placemaking. It also identifies a "Tree Palette" of recommended tree species for Culver City, as a process for selecting certain species for each location in the City. Areas of greatest need are described as "Places of Priority." Along with the other recommendations related to habitat and existing conditions, the UFMP's Tree Palette and Designations provide a plan for creating a more resilient urban forest in Culver City. As a master list of all the species that are recommended for Culver City's urban forest, the Tree Palette includes *Ulmus parvifolia*, or Chinese Elm, and other researched tree species.

Culver City Municipal Code

Culver City Municipal Code (CCMC) Titles 15 and 17 include regulations related to aesthetics and visual character including art in public places, building heights, lighting, signage, and landscaping, as described below. Title 9 (General Regulations) of the CCMC includes regulations to ensure quality development throughout the city.

Art in Public Places

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

Building Height

CMC Section 17.300.025 provides the maximum building heights by zoning designation. In 1990, the City Council approved an initiative that limits building heights in commercial and planned development zones throughout the city to 56 feet. An exemption to the 56-foot maximum building height may be granted only by complying with the state’s density bonus law as determined during the project review process or with the height exception process described in the Zoning Code. In CCMC Title 17, the maximum building is limited to 3 stories and 40 feet or less for residential uses; the maximum building height is limited to 56 feet or less for commercial uses; the maximum building heights is limited to 43 feet or less for industrial uses; and for Planned Development Zones, maximum building heights is limited to 56 feet or less. CCMC Section 17.300.025.C, Exceptions to Height Limits, allows non-habitable design elements, such as spires, turrets, towers, and similar architectural features to extend up to 13 feet, 6 inches above the height of the building.

CCMC Section 17.300.035.C.1, Screening of Utilities, requires mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts), loading docks, refuse and recyclable materials storage areas, and utility services to be screened from public view from adjoining public streets and rights-of-way. The method of screening is required to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Director.

Lighting

CCMC Section 17.300.040, *Outdoor Lighting*, requires that exterior lighting comply with the following conditions:

1. All lighting fixtures shall be architecturally integrated with the character of the structure.
2. All lighting shall be energy-efficient and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the

site and shall be directed downward and away from adjoining properties and public rights-of-way.

3. Permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness.
4. Timers, where acceptable, shall be used to turn off lights during hours when they are not needed.
5. Uniformity or, where appropriate, compatibility of lighting type (i.e., height, wattage, energy efficiency, base support, finish material, texture, color and style of poles and luminaires) shall be provided.
6. Landscaping and pedestrian walkway lights shall be low profile.
7. Freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director, to mitigate any impacts to adjoining properties.
8. Security lighting shall be provided at all entrances/exits, except in a residential zone.

Signage

CCMC Section 17.330, *Signs*, provides a comprehensive system for the regulation of signs in the City in order to address community aesthetics, vehicular and pedestrian safety, property values, and the visual environment. Section 17.330.020.B, Table 3.5, and Section 17.330.025 identify the types of signs allowed in non-residential zoning districts and the corresponding maximum sign area, maximum sign height, maximum number of signs, location, and additional requirements. Section 17.330.030, General Requirements for All Signs, includes requirements for sign measurement (area and height), sign location, aesthetic design standards, sign illumination, installation, and maintenance standards. CCMC Section 17.330.050, Review Process and Appeals, identifies permit requirements, sign-related decisions and appeals, and other requirements for Comprehensive Sign Programs.

Landscaping

CCMC Section 17.310 provides landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements and general landscaping and irrigation requirements. CCMC Section 17.310.030 requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Preliminary Landscape Plan includes such features as proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary list of plant materials. The Final Landscape Plan identifies such features as plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

4.1.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

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

The Initial Study (Appendix A) found that no potentially significant impacts related to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway (Threshold AES-2) would occur with implementation of the Project. Therefore, this issue is not studied further in this PEIR.

Methodology

The evaluation of aesthetics and aesthetic impacts is generally subjective by nature, and therefore the level of the Project's visual impact is difficult to quantify. As such, this analysis was conducted qualitatively, assessing potential implications of implementation of the General Plan 2045 on scenic views, existing visual character and scenic quality, and light and glare sources within the Planning Area. In addition, it is difficult to estimate the impact future development would have on scenic resources, since individual development projects are not known at this time and can be designed to be compatible with and/or enhance the aesthetic quality of an area. As such, the following analysis considers the overall changes to the land use pattern and the potential location of future development as well as the overall amount of new development at buildout of the Project.

Scenic Vistas

The analysis of scenic vistas includes a qualitative analysis of whether future development allowed under the Project would block views of valued visual resources and scenic vistas from public vantage points in the Planning area. For purposes of this analysis, when analyzing aesthetic impacts, views generally refer to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Panoramic" views are considered vistas and provide visual access to a large geographic area, for which the field of view can be wide and extend into

the distance. Panoramic vistas are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views and vistas might include an urban skyline or mountain range. “Focal views” focus on a particular object, scene, setting, or feature of visual interest. Examples of focal views include public art/signs and notable buildings and structures.

Light and Glare

The analysis of light and glare describes the existing light and glare environments in the Planning Area, identifies the light- and glare-sensitive land uses, describes potential light and glare sources associated with future development under the Project, and qualitatively evaluates whether future development under the Project would result in a substantial increase in nighttime lighting and daytime glare as seen from sensitive uses within the Planning Area.

Other

Although the CEQA Guidelines do not provide a threshold pertinent to shade/shadow, a general discussion of the effects of shade and shadow is provided under light and glare, below.

During the scoping process, the City received comments regarding ocean breezes. The comments were specific to the Fox Hills neighborhood and concern that the increase in density and building height could affect ocean breezes. However, the CEQA Guidelines do not provide a threshold pertinent to ocean breezes. The City anticipates that given the topography as well as the setbacks and articulation required in the Zoning Code Update standards, that breezes would not be obstructed.

Project Impact Analysis

Scenic Vistas

Threshold AES-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would have a substantial adverse effect on a scenic vista.

Impact Statement AES-1: While there are no designated scenic vistas in the Planning Area, there are long-range views and view corridors which could be impacted during construction and operation of future development that would occur under the Project. However, future development would be required to comply with the goals and policies of the General Plan 2045 that protect scenic vistas as well as with all applicable laws, regulations, and standards related to scenic vistas. Therefore, impacts related to a substantial adverse effect on a scenic vista would be less than significant.

General Plan 2045

As discussed in Section 4.1.2, *Environmental Setting*, while the Planning Area does not have any designated scenic vistas, the Blair Hills/Baldwin Hills area, including the Baldwin Hills Scenic Overlook, offers expansive, long-range views. In addition, there are view corridors from Playa Street traveling northeast towards Overland Avenue; Elenda Street traveling northwest towards Culver Boulevard; and Jefferson Boulevard traveling south along Ballona Creek.

The Planning Area is mainly characterized by urban environments, and as a result, scenic vistas are mostly limited to open space, vacant natural areas, and parks. The General Plan 2045 introduces land use changes throughout the city, primarily through redevelopment and infill development due to the highly urbanized nature of the Planning Area and the limited amount of vacant land. Land uses proposed within the Planning Area include four main categories of land uses: activity centers, commercial corridors, residential neighborhoods, and parks/open space. The General Plan 2045 would continue to guide development with its goals and policies that ensure that opportunities to enjoy scenic views, parks, natural areas, and open space are either preserved or enhanced.

Due to the highly urbanized nature of the Planning Area, the majority of the future development that would occur under the General Plan 2045 would primarily occur on parcels that already contain existing development. The City's primary approach to accommodating growth is to provide strategies for infill development and redevelopment within opportunity sites located in activity centers and along commercial corridors. By focusing development in infill areas, the General Plan 2045 relieves pressure to develop in open space and natural areas while adhering to the visual character of the existing neighborhoods. This approach allows for the preservation of open space views and the enhancement of urban views.

In addition, the General Plan 2045 includes several policies pertaining to preserving these resources and their scenic qualities. Policies include context-specific development standards that provide clear guidance for height limitations, bulk and massing controls for future development. For example, large opportunity sites and activity centers are locations where increase in development, including building height, would be appropriate. Policies address the need to study increasing building heights in certain areas of the city, including opportunity sites and in mixed use development areas (Policies LU-4.1 and LU-4.3) as well as near transit stations (Policy LU-1.8) and for small lots (Policy LU-3.3). Policies also address compatibility with surrounding neighborhoods (Policy LU-6.4) and implementation of the City View Preservation Ordinance (Policy LU-12.3). While the General Plan 2045 does not include maximum building heights it recognizes the relevance of development standards, including building heights, and includes proposed policies to study increasing building heights in certain areas of the city. Building heights are addressed in the Zoning Code Update, which is discussed below.

In addition, individual development projects would be subject to development and planning review and would be required to comply with applicable regulations regarding aesthetic qualities such as building heights, building setbacks, lighting, landscaping, and signage. Thus, compliance with the applicable regulations would minimize effects to scenic vistas as future development occurs under the General Plan 2045. As such, the approach of infill development and redevelopment to increase densities across the Planning Area in combination with implementing the goals and policies of the General Plan 2045, impacts to scenic vistas would be less than significant.

Zoning Code Update

The Zoning Code Update would provide requirements for future development consistent with the General Plan goals and policies. The Zoning Code Update would establish the zoning districts

associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and tailored building heights.

Currently, the maximum building height for commercial and planned development zones throughout the city is 56 feet. This maximum height was established in 1990 through a City Council approved initiative. An exemption to the 56-foot maximum building height may be granted only by complying with the state's density bonus law as determined during the project review process or with the height exception process described in the Zoning Code. The Zoning Code Update would result in some increases in allowable building heights in limited areas throughout the city. Some areas where increases in allowable building heights would occur include some of the Mixed Use Industrial zoned properties in the Hayden Tract and some properties along Jefferson Boulevard that would be zoned Mixed Use Industrial and Mixed Use Corridor 2. In addition, some parcels in the Fox Hills neighborhood that would be zoned High Density Multifamily would have allowable height limits of up to 56 feet, which is greater than current allowable heights. Also, some properties that would be zoned Medium Density Multifamily in the Washington Culver neighborhood would have 48-foot height limits, which is greater than the current allowable height of 40 feet in the area. However, as is currently the case, the maximum height in the Zoning Code Update would be limited to 56 feet, with the exception of future development that complies with the state's density bonus law as determined during the project review process or with the height exception process described in the Zoning Code. While there would be increases in height in areas of the City, the individual development projects would be subject to development and planning review and would be required to comply with other applicable regulations regarding aesthetic qualities such as building setbacks, lighting, landscaping, and signage that would be established to protect visual resources. Thus, compliance with the applicable regulations would minimize effects to scenic vistas as future development occurs.

As such, the Zoning Code Update would not result in a substantial adverse effect on a scenic vista. Future development would be reviewed by the City for compliance with applicable requirements and the mitigation measures referenced in other sections of this PEIR. Therefore, impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design Element

LU-1.8: Development standards near transit stations. Allow relaxed development standards within half a mile of high-quality transit, such as reduced setbacks and greater building height.

LU-3.3: Development standards review program. Evaluate and modify existing development standards that prevent development on small sites, e.g., setbacks and height transitions.

LU-4.1: Height limitations. Study increasing the height limit in certain areas of the city to support housing, affordable housing, and publicly accessible open space provision. Study the introduction of additional development standards that provide clear guidance

of bulk and massing controls. Standards could include floor plate limits, maximum façade lengths, step backs, or similar.

LU-4.3: Mixed use development. On large nonresidential sites, study relaxing of development standards and raising of height limits to allow concentrated, new vertical residential development to maintain existing commercial, industrial, and studio uses, and to create horizontal mixed use development on the site.

LU-6.4: Studio compatibility. Continue to implement design standards for neighborhood compatibility that regulate height, circulation, sound, and lighting.

LU-12.3: Views. Implement the City View Preservation Ordinance.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to a substantial adverse effect on a scenic vista.

Conflict with Applicable Regulations Governing Scenic Quality

Threshold AES-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would conflict with applicable zoning and other regulations governing scenic quality.

Impact Statement AES-2: The Project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant.

General Plan 2045

While the General Plan 2045 would increase densities and intensities of land uses, the majority of the proposed changes would occur within Culver City with limited land use changes occurring within the SOI. Proposed policies in the General Plan 2045 are intended to complement and improve the existing scenic quality and resources in the City as well as to implement the City's vision for the future character of the City.

Future development under the Project would be reviewed for compliance with the goals and policies of the General Plan 2045 related to scenic quality, including scenic views and scenic resources. The General Plan 2045 includes policies intended to reduce impacts to visual character in and around the Planning Area and promote cohesive and visually appealing development consistent with the character of the city. Proposed policies aim to maintain design standards that provide clear guidance of bulk and massing controls for future development and require compliance with location-specific design guidelines. In addition, building heights in certain zones are limited to 56 feet citywide as a result of the initiative passed in 1990. The General Plan 2045 includes proposed policies to study increasing building heights to support an increase in the housing stock, the inclusion of affordable housing and public open space provisions as well as increasing building height limits on large non-residential parcels to allow for

new concentrated vertical residential development in certain areas of the city. However, as discussed above, building heights are not addressed in the General Plan 2045, but are development standards in the Zoning Code Update. The Zoning Code Update does not propose increasing heights beyond 56 feet for any of the zones. Future development under the Project within the SOI would be required to comply with the Los Angeles County General Plan and Code of Ordinances which contain provisions that would protect scenic resources.

Future development occurring under the proposed General Plan 2045 would be subject to regulations in the CCMC, which implements the City's General Plan, and would be reviewed for compliance prior to project approval. The Zoning Code requirements and the Zoning Code Update are discussed below. Compliance with the policies of the General Plan 2045 and the CCMC would ensure that future development would be consistent with the scenic character and would not detract from the scenic quality of the city. For these reasons, impacts to scenic quality within the city would be less than significant.

In regard to the SOI, the designation in the General Plan 2045 would remain Open Space as the area is currently designated. The Los Angeles County General Plan and Municipal Code contain provisions that would protect scenic resources. With the applicable policies listed under Impact Statement AES-1, the General Plan 2045 would therefore, not substantially degrade the existing visual character or quality of public views of the SOI and its surroundings, and thus, the impact of the Project on scenic quality within the SOI would be less than significant.

Zoning Code Update

The Zoning Code Update would provide requirements for future development consistent with the General Plan goals and policies. The Zoning Code Update would provide specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and tailored building heights consistent with the General Plan 2045. As such, the Zoning Code Update would not conflict with the General Plan 2045 and other regulations governing scenic quality and visual character. The form and mass of future buildings would be dictated by the standards, including setbacks, FAR, building height, and lot coverage. While some increase in building height would occur in certain areas of the city, the maximum building heights throughout the city would be 56 feet, consistent with the initiative approved by City Council in 1990. In addition, CCMC Section 17.310 provides landscaping regulations and standards to enhance landscaping; CCMC Section 17.300.035.C.1 (Screening of Utilities), requires mechanical equipment, loading docks, refuse and recyclable materials storage areas, and utility services to be screened from public view; and CCMC Section 17.300.035.C.2 requires the method of screening to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style. Future development would be reviewed by the City for compliance with applicable requirements and the mitigation measures referenced in other sections of this PEIR. Therefore, impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

See policies listed under Impact Statement AES-1.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to conflicts with applicable zoning and other regulations governing scenic quality.

Light and Glare Impacts

Threshold AES-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impact Statement AES-3: The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant.

General Plan 2045

The General Plan 2045 includes an updated Land Use Element and Land Use Map, which would result in increased densities and intensities of land uses. New development would primarily occur on parcels that already contain some development. The primary approach to accommodating growth is to provide strategies for infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors.

Since the Planning Area is urban, future development under the Project would primarily occur on parcels that already contain uses that currently generate light and/or glare. However, future development under the General Plan 2045 would create new sources of light and glare within the Planning Area, which could contribute to increased ambient nighttime lighting conditions. Specific sources of new lighting would include residential and non-residential interior and exterior lighting, parking lot lighting, and non-residential signage lighting. While future development would include additional lighting and/or materials that could cause glare, the addition of these light and glare sources would be consistent with the existing urban environment and would replace the previous onsite light and glare sources. Therefore, any increase in ambient nighttime light conditions would not be substantial and would not be out of character with the urban environment.

In addition, the General Plan 2045 includes policies requiring the use of low intensity and shielded lighting to reduce the amount of light reaching sensitive habitat, ensure neighborhood compatibility and reduce light and glare impacts in and around the Planning Area. The General Plan 2045 also includes policies to incorporate shielded or directed low level lights along the Ballona Creek path, parks and other open spaces in the city to promote safety and security while avoiding light spill and glare onto residential properties and habitats adjacent to the creek and ensure neighborhood compatibility (Policies C-6.5, C-6.7, C-2.8, LU-6.4, and PR-6.5). Nighttime lighting in parks would enable greater availability of facilities. Policy PR-2.4 would ensure that

impacts from light exposure on nearby residents is avoided. In addition, future development under the Project would be required to comply with applicable regulations related to lighting to minimize the effects of new light sources.

The General Plan 2045 includes policies related to buffering between development and sensitive habitats, and between future development and existing uses. Adherence to design standards in the CCMC and other regulations would ensure that light and glare from future development and redevelopment projects facilitated under the General Plan 2045 would be minimized. As such, impacts related to light and glare would be less than significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the land use designations in the General Plan 2045. Future development under the Zoning Code Update would be required to comply with applicable lighting regulations and standards. Such requirements include directing light to be oriented downward and to avoid any light spillover to adjacent properties; requiring that permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness; landscaping and pedestrian walkway lights shall be low profile; and that freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director of Planning. Therefore, impacts regarding light and glare that could affect day or nighttime views in the area would be less than significant.

Applicable Proposed General Plan Goals and Policies

Conservation Element

C-2.8: Lighting near open spaces. Require that development near natural open space areas include low-intensity lighting to reduce the amount of light that reaches sensitive habitat.

C-6.5: Lighting along Ballona Creek. Incorporate shielded or directed low level lights along the Ballona Creek path to promote safety and security while avoiding light spill and glare onto residential properties and habitats adjacent to the Creek.

C-6.7: Design innovation along the Ballona Creek corridor. Encourage design innovation in new development along the Ballona Creek corridor while avoiding significant noise and lighting effects on residential uses adjacent to the Creek. For example, orient improvements towards the creek, landscape open space areas, include public art like murals, decks/overlooks, seating, shade, bicycle facilities, and connections to the Ballona Creek path.

Land Use and Community Design Element

LU-6.4: Studio compatibility. Continue to implement design standards for neighborhood compatibility that regulate height, circulation, sound, and lighting.

Parks, Recreation, and Public Facilities Element

PR-6.5: Vegetation management. Manage vegetation at parks and open spaces in Culver City to support biodiversity by reducing pesticide use, reducing light pollution, and planting native and non-native species that provide valuable resources for native wildlife and increase resilience.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to creating a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Supplemental Shading Discussion

Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. Currently, the maximum building height allowed in the City is 56 feet, which would not change with the Zoning Code Update. However, under the Zoning Code Update some areas of the City would have an increase in the allowable building height. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures. Shading impacts are influenced by the height and bulk of a building or structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses or receptors. As the sun moves from the east to the west throughout the day, shadow lengths and direction move accordingly. Shadows are longest during the winter, with the maximum length occurring during the Winter Solstice (December 22). During the spring, fall, and summer, shadow lengths are shorter than winter shadows.

The consequences of shadows on land uses can be positive, including cooling effects during warm weather or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping and human activity. A use that would be important to protect would be existing solar collectors. While some increase in building heights would occur in some of the proposed zoning districts, the maximum building height in the City would not exceed the current maximum height of 56 feet. The effect of a new building would depend on the building orientation and the location of heights on the particular site. The City could require a shade/shadow analysis for a particular project if determined to be necessary to ensure the protection of solar collectors.

4.1.5 Cumulative Impact Analysis

The geographic context for cumulative visual impacts that would occur under the General Plan 2045 is the Planning Area, including the SOI, and those areas in the immediate vicinity of the Planning Area boundaries which are visible from or have a clear view of the city, including the City of Los Angeles and an unincorporated area of Los Angeles County, known as Ladera Heights to the southeast. However, the primary contributor to potential visual changes in and surrounding the city is future development under the Project.

No state scenic highway is located within the southern region of Los Angeles County, including Culver City, and thus reasonably foreseeable growth within the central southern region of Los Angeles County, including Culver City, would not substantially damage scenic resources within the corridor of a state scenic highway. The Project would not contribute to a cumulative impact with respect to a state scenic highway would occur.

Future development and growth within this region of Los Angeles County, including the City, could have cumulative effects on the region's aesthetic character, thus resulting in a significant cumulative impact. The Planning Area is characterized by residential, commercial, industrial and institutional uses, the IOF, public facilities, and parks. Development to accommodate future residents and jobs may impact scenic vistas should it encroach on open hillsides. Various proposed policies including those that address open space preservation and sensitive transitions between new and existing development would ensure that scenic quality is maintained in the City. Additionally, it is unlikely that significant growth would occur in the SOI. With compliance with applicable policies and regulations related to aesthetics, the cumulative impact would be less than significant. Therefore, the Project would not contribute to a cumulative significant impact related to scenic vistas and conflicts with applicable zoning and other regulations governing scenic quality in an urbanized area.

The City is in an urban area with numerous sources of nighttime lighting. The cumulative effect of existing development has resulted in a cumulative loss of available nighttime views (i.e., cityscape or foothills). However, the contribution of the Project to this cumulative impact would not be cumulatively considerable as growth anticipated under the General Plan 2045 would comply with applicable requirements that regulate the placement of exterior lighting and would comply with General Plan 2045 policies regarding buffering between development and sensitive habitats, and between new development and existing uses. Given the applicable goals, policies and regulations pertinent to lighting and illuminated signage, the Project would not contribute to a significant cumulative impact. Therefore, the Project would result in less-than-significant cumulative impacts related to aesthetic impacts.

4.2 Air Quality

4.2.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on air quality from implementation of the Project, including potential impacts related to conflict with or obstruction of air quality plans, a cumulatively considerable net increase in criteria pollutants, and exposing sensitive receptors to substantial pollutant concentrations. The section provides context regarding the Planning Area's existing criteria pollutants and emissions, as well as relevant federal, State, and local regulations and programs.

4.2.2 Environmental Setting

Regional Context

Criteria Pollutants and Effects

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

The six principal pollutants for which national and State criteria and standards have been promulgated, known as “criteria pollutants”, and which are most relevant to current air quality planning and regulation in the Air Basin include O₃, respirable and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them, as summarized in **Table 4.2-1, Ambient Air Quality Standards**.

¹ USEPA, 2023. NAAQS Table, last updated on March 15, 2023. <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed December 2023.

² South Coast Air Quality Management District (SCAQMD), 2022. 2022 Air Quality Management Plan, Appendix I-154, Adopted December 2, 2022.

**TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards ^a		National Standards ^b		
		Concentration ^c	Method ^d	Primary ^{c,e}	Secondary ^{c,f}	Method ^g
O ₃ ^h	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
NO ₂ ⁱ	1 Hour	180 ppb (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb	None	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	30 ppb (57 µg/m ³)		53 ppb	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
SO ₂ ^j	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method) ⁹
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ^j	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) ^j	—	
PM10 ^k	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
PM2.5 ^k	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ^{3k}		
Lead ^{l,m}	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³ (for certain areas) ^m	Same as Primary Standard	
	Rolling 3-Month Average ^m	—		0.15 µg/m ³		

Pollutant	Average Time	California Standards ^a		National Standards ^b		
		Concentration ^c	Method ^d	Primary ^{c,e}	Secondary ^{c,f}	Method ^g
Visibility Reducing Particles ^h	8 Hour	Extinction coefficient of 0.23 per kilometer—visibility of 10 miles or more (0.07–30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates (SO ₄)	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ⁱ	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

^a California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m³) is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

^c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^d Any equivalent procedure which can be shown to the satisfaction of CARB to give equivalent results at or near the level of the air quality standard may be used.

^e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

^f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^g Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

^h On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

ⁱ To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

^j On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

^k On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³.

^l CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

^m The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

ⁿ In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: California Air Resources Board, 2016. Ambient Air Quality Standards (5/4/16), <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>. Accessed January 2024.

Ozone (O₃). Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO_x) in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath.³ Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.⁴ Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children.⁵ According to the California Air Resource Board (CARB), inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.⁶

The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.⁷ Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure.⁸ According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.⁹ Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures.¹⁰ Further research may be able to better distinguish between health effects in children and adults.¹¹

Volatile Organic Compounds (VOCs). VOCs are organic chemical compounds of carbon and are not “criteria” pollutants themselves; however, in combination with NO_x they form ozone, and

³ United States Environmental Protection Agency, 2023a. Health Effects of Ozone Pollution, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed January 2024.

⁴ Ibid.

⁵ Ibid.

⁶ California Air Resource Board, 2023a. Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed January 2024.

⁷ United States Environmental Protection Agency, 2023a. Health Effects of Ozone Pollution, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed January 2024.

⁸ Ibid.

⁹ California Air Resource Board, 2023a. Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed January 2024.

¹⁰ Ibid.

¹¹ Ibid.

are regulated to prevent the formation of ozone.¹² According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and in some cases, VOCs can be both highly reactive and have adverse health effects.¹³ VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).¹⁴

Nitrogen Dioxide (NO₂) and Nitrogen Oxides (NO_x). NO_x is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include NO₂ and nitric oxide (NO). Ambient air quality standards have been promulgated for NO₂, which is a reddish-brown, reactive gas.¹⁵ The principle form of NO_x produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO₂, creating the mixture of NO and NO₂ referred to as NO_x.¹⁶ Major sources of NO_x include emissions from cars, trucks and buses, power plants, and off-road equipment.¹⁷ The terms NO_x and NO₂ are sometimes used interchangeably. However, the term NO_x is typically used when discussing emissions, usually from combustion-related activities, and the term NO₂ is typically used when discussing ambient air quality standards. Where NO_x emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_x emissions would oxidize in the atmosphere to form NO₂.

According to the USEPA, short-term exposures to NO₂ can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms while longer exposures to elevated concentrations of NO₂ may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.¹⁸ According to CARB, controlled human exposure studies that show that NO₂ exposure can intensify responses to allergens in allergic asthmatics.¹⁹ In addition, a number of epidemiological studies have demonstrated associations between NO₂ exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.²⁰ Infants and children are particularly at risk from exposure to NO₂ because they have disproportionately higher exposure to NO₂ than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive

¹² United States Environmental Protection Agency, 2023b. Technical Overview of Volatile Organic Compounds. <https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds>. Accessed January 2024.

¹³ California Air Resources Board, 2023b. CARB Identified Toxic Air Contaminants. <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>. Accessed January 2024.

¹⁴ Ibid.

¹⁵ California Air Resources Board, 2023c. Nitrogen Dioxide & Health. <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed January 2024.

¹⁶ Ibid.

¹⁷ United States Environmental Protection Agency, 2023c. Nitrogen Dioxide (NO₂) Pollution. <https://www.epa.gov/no2-pollution/basic-information-about-no2>. Accessed January 2024.

¹⁸ Ibid.

¹⁹ California Air Resources Board, 2023c. Nitrogen Dioxide & Health. <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed January 2024.

²⁰ Ibid.

pulmonary disease.²¹ CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO₂ and there is only limited information for NO and NO_x, as well as large uncertainty in relating health effects to NO or NO_x exposure.²²

Carbon Monoxide (CO): Carbon monoxide (CO) is primarily emitted from combustion processes and motor vehicles due to the incomplete combustion of fuel, such as natural gas, gasoline, or wood, with the majority of outdoor CO emissions from mobile sources.²³ According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.²⁴ Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress.²⁵ In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.²⁶ According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.²⁷ For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance.²⁸ Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.²⁹

Sulfur Dioxide (SO₂). According to the USEPA, the largest source of sulfur dioxide (SO₂) emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities while smaller sources of SO₂ emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content.³⁰ In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million (ppm), down from the previous requirement of 500 ppm,

²¹ California Air Resources Board, 2023c. Nitrogen Dioxide & Health. <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed January 2024.

²² Ibid.

²³ California Air Resources Board, 2023d. Carbon Monoxide & Health. <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed January 2024.

²⁴ United States Environmental Protection Agency, 2023d. Carbon Monoxide (CO) Pollution in Outdoor Air. <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>. Accessed January 2024.

²⁵ Ibid.

²⁶ Ibid.

²⁷ California Air Resources Board, 2023d. Carbon Monoxide & Health. <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed January 2024.

²⁸ Ibid.

²⁹ Ibid.

³⁰ United States Environmental Protection Agency, 2023e. Sulfur Dioxide (SO₂) Pollution. <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects>. Accessed January 2024.

substantially reducing emissions of sulfur from diesel combustion.³¹ According to the USEPA, short-term exposures to SO₂ can harm the human respiratory system and make breathing difficult.³² According to CARB, health effects at levels near the state 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO₂ (above 1 ppm) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.³³ Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO₂.^{34,35}

Particulate Matter (PM10 and PM2.5). Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air.³⁶ Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so small they can only be detected using an electron microscope.³⁷ Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers and smaller (PM10); and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM2.5).³⁸ Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.³⁹ Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood.⁴⁰ PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO₂, NO_x, and certain organic compounds.⁴¹ According to CARB, both PM10 and PM2.5 can be inhaled, with some depositing throughout the airways; PM10 is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM2.5 is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.⁴² Short-term (up to 24 hours duration) exposure to PM10 has been associated primarily with worsening of respiratory diseases, including

³¹ California Air Resources Board, 2004. Final Regulation Order, Amendments to the California Diesel Fuel Regulations, Amend Section 2281, Title 13, California Code of Regulations. <https://www.arb.ca.gov/regact/ulsd2003/fro2.pdf>. Accessed January 2024.

³² United States Environmental Protection Agency, 2023e. Sulfur Dioxide (SO₂) Pollution. <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects>. Accessed January 2024.

³³ California Air Resources Board, 2023e. Sulfur Dioxide & Health. <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed January 2024.

³⁴ Ibid.

³⁵ United States Environmental Protection Agency, 2023e. Sulfur Dioxide (SO₂) Pollution. <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects>. Accessed March 2023.

³⁶ United States Environmental Protection Agency, 2023f. Particulate Matter (PM) Pollution, <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>. Accessed January 2024.

³⁷ Ibid.

³⁸ Ibid.

³⁹ California Air Resources Board, 2023f. Inhalable Particulate Matter and Health (PM2.5 and PM10). <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed January 2024.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² California Air Resources Board, 2023f. Inhalable Particulate Matter and Health (PM2.5 and PM10). <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed January 2024.

asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits.⁴³ The effects of long-term (months or years) exposure to PM₁₀ are less clear, although studies suggest a link between long-term PM₁₀ exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.⁴⁴ Short-term exposure to PM_{2.5} has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM_{2.5} has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.⁴⁵ According to CARB, populations most likely to experience adverse health effects with exposure to PM₁₀ and PM_{2.5} include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM₁₀ and PM_{2.5} compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.⁴⁶

Lead (Pb). Major sources of lead emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers.⁴⁷ In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014.⁴⁸ Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood.⁴⁹ The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.⁵⁰ Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.⁵¹

Existing Criteria Pollutants Levels at Nearby Monitoring Stations

The South Coast Air Quality Management District (SCAQMD) maintains a network of air quality monitoring stations located throughout the South Coast Air Basin (SCAB) to measure ambient pollutant concentrations. Culver City is primarily located in SCAQMD Source Receptor Area (SRA) 2 (Northwest Los Angeles County Coastal) with the southern portion of Culver City located in SCAQMD SRA 3 (Southwest Los Angeles County Coastal). The monitoring stations representative of the ambient air quality conditions in Culver City are the Southwest Los Angeles

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ United States Environmental Protection Agency, 2023g. Lead Air Pollution. <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>. Accessed January 2024.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ California Air Resources Board, 2023g. Lead & Health. <https://ww2.arb.ca.gov/resources/lead-and-health>. Accessed January 2024.

⁵¹ Ibid.

County Coastal Monitoring Station 091 in SRA 2 and the Northwest Los Angeles County Monitoring Station 820 in SRA 3. Station 091 collects monitored data for CO, ozone, and NO₂. Station 820 collects monitored data for CO, ozone, NO₂, SO₂, PM10, and lead. The nearest station which collects data on PM2.5 is Station 087 in SRA 1 (Central Los Angeles County).

The most recent data available from SCAQMD for these monitoring stations are from years 2019 to 2022. The pollutant concentration data for these years are summarized in **Table 4.2-2, Air Pollutant Standards and Ambient Air Quality Data – SRA 2, Table 4.2-3, Air Pollutant Standards and Ambient Air Quality Data – SRA 3, and Table 4.2-4, Air Pollutant Standards and Ambient Air Quality Data – SRA 1 (for PM2.5)**. As shown, ambient concentrations have remained relatively consistent between 2019 and 2022, with ozone, NO₂, CO, and PM2.5 trending lower in more recent years.

**TABLE 4.2-2
AIR POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA – SRA 2**

Pollutant/Standard	2019	2020	2021	2022
Ozone, O₃ (1-hour)				
Maximum Concentration (ppm)	0.086	0.134	0.095	0.081
Days > CAAQS (0.09 ppm)	0	6	1	0
Ozone, O₃ (8-hour)				
Maximum Concentration (ppm)	0.075	0.092	0.082	0.070
4th High 8-hour Concentration (ppm)	0.064	0.078	0.059	0.058
Days > CAAQS (0.070 ppm)	1	8	1	0
Days > NAAQS (0.070 ppm)	1	8	1	0
Nitrogen Dioxide, NO₂ (1-hour)				
Maximum Concentration (ppm)	0.048	0.076	0.060	0.051
Days > CAAQS (0.18 ppm)	0	0	0	0
98th Percentile Concentration (ppm)	0.043	0.043	0.041	0.044
Days > NAAQS (0.100 ppm)	0	0	0	0
Nitrogen Dioxide, NO₂ (Annual)				
Annual Arithmetic Mean (0.030 ppm)	0.009	0.010	0.010	0.011
Carbon Monoxide, CO (1-hour)				
Maximum Concentration (ppm)	1.9	2.0	1.5	— ^a
Days > CAAQS (20 ppm)	0	0	0	0
Days > NAAQS (35 ppm)	0	0	0	0
Carbon Monoxide, CO (8-hour)				
Maximum Concentration (ppm)	1.2	1.2	1.0	— ^a
Days > CAAQS (9.0 ppm)	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0

NOTES: SRA = Source Receptor Area; ppm = parts per million; µg/m³ = micrograms per cubic meter

^a Criteria pollutants were not measured at the receptor area location during this year.

SOURCE: South Coast Air Quality Management District, 2019, 2020, 2021, 2022. Historical Data by Year, <https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>. Accessed January 2024.

**TABLE 4.2-3
POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA – SRA 3**

Pollutant/Standard	2019	2020	2021	2022
Ozone, O₃ (1-hour)				
Maximum Concentration (ppm)	0.082	0.117	0.059	__a
Days > CAAQS (0.09 ppm)	0	1	0	0
Ozone, O₃ (8-hour)				
Maximum Concentration (ppm)	0.067	0.074	0.049	__a
4th High 8-hour Concentration (ppm)	0.060	0.066	0.047	__a
Days > CAAQS (0.070 ppm)	0	2	0	0
Days > NAAQS (0.070 ppm)	0	2	0	0
Nitrogen Dioxide, NO₂ (1-hour)				
Maximum Concentration (ppm)	0.056	0.076	0.062	__a
Days > CAAQS (0.18 ppm)	0	0	0	0
98th Percentile Concentration (ppm)	0.043	0.059	0.047	__a
Days > NAAQS (0.100 ppm)	0	0	0	0
Nitrogen Dioxide, NO₂ (Annual)				
Annual Arithmetic Mean (0.030 ppm)	0.009	0.009	0.007	__a
Carbon Monoxide, CO (1-hour)				
Maximum Concentration (ppm)	1.8	1.6	1.7	__a
Days > CAAQS (20 ppm)	0	0	0	0
Days > NAAQS (35 ppm)	0	0	0	0
Carbon Monoxide, CO (8-hour)				
Maximum Concentration (ppm)	1.3	1.3	1.3	__a
Days > CAAQS (9.0 ppm)	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0
Sulfur Dioxide, SO₂ (1-hour)				
Maximum Concentration (ppm)	0.008	0.006	__a	__a
Days > CAAQS (0.25 ppm)	0	0	0	0
98th Percentile Concentration (ppm)	0.003	0.003	__a	__a
Days > NAAQS (0.075 ppm)	0	0	0	0
Respirable Particulate Matter, PM₁₀ (24-hour)				
Maximum Concentration (µg/m ³)	62	43.0	33	__a
Samples > CAAQS (50 µg/m ³)	2	0	0	__a
Samples > NAAQS (150 µg/m ³)	0	0	0	0
Respirable Particulate Matter, PM₁₀ (Annual)				
Annual Arithmetic Mean (20 µg/m ³)	19.2	22.5	17.7	__a

Pollutant/Standard	2019	2020	2021	2022
Lead				
Maximum 30-day average ($\mu\text{g}/\text{m}^3$)	0.004	0.008	0.003	— ^a
Samples > CAAQS (1.5 $\mu\text{g}/\text{m}^3$)	0	0	0	0
Maximum 3-month rolling average ($\mu\text{g}/\text{m}^3$)	0.004	0.005	0.004	— ^a
Days > NAAQS (0.15 $\mu\text{g}/\text{m}^3$)	0	0	0	0

NOTES: SRA = Source Receptor Area; ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter
SOURCE: South Coast Air Quality Management District, 2019, 2020, 2021, 2022. Historical Data by Year, <https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>. Accessed January 2024.

**TABLE 4.2-4
POLLUTANT STANDARDS AND AMBIENT AIR QUALITY DATA – SRA 1 (FOR PM2.5)**

Pollutant/Standard	2019	2020	2021	2022
Fine Particulate Matter, PM2.5 (24-hour)				
Maximum Concentration ($\mu\text{g}/\text{m}^3$)	43.5	47.3	61	33.7
98th Percentile Concentration ($\mu\text{g}/\text{m}^3$)	28.3	28	44.8	21.9
Samples > NAAQS (35 $\mu\text{g}/\text{m}^3$)	1	2	12	0
Fine Particulate Matter, PM2.5 (Annual)				
Annual Arithmetic Mean (12 $\mu\text{g}/\text{m}^3$)	10.85	12.31	12.77	10.94

NOTES: SRA = Source Receptor Area; ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter
SOURCE: South Coast Air Quality Management District, 2019, 2020, 2021, 2022. Historical Data by Year, <https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>. Accessed January 2024.

Toxics Air Contaminants

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655 as an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant. CARB has listed approximately 200 toxic substances, including diesel particulate matter, which are identified on the California Air Toxics Program's TAC List. TACs are not classified as "criteria" air pollutants. The effects of TACs can be diverse and their health impacts tend to be local rather than regional. Consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and non-cancer exposure levels.

The SCAQMD periodically assesses levels of TACs in the Air Basin. In August 2021, the SCAQMD released the Final Multiple Air Toxics Exposure Study V (MATES V).⁵² The MATES V study includes a fixed site monitoring program with 10 stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the Air Basin. The purpose of the fixed

⁵² South Coast Air Quality Management District. 2021a. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin MATES V.

site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V.

First, MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (Assembly Bill [AB] 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA) risk assessment methodologies and modern statistical methods to examine the trends over time. This has led to a reduction of the Air Basin average air toxics cancer risk in MATES V of 455 in one million (multiple exposure pathways), compared to MATES IV of 997 in one million.⁵³ The Air Basin average air toxics cancer risk in MATES V for the inhalation exposure pathway only is 424 in one million.

The key takeaways from the MATES V study include: air toxics cancer risk has decreased by about 50 percent since MATES IV based on modeling data; MATES V Basin average multi-pathway air toxics cancer risk is 455 in one million, with the highest risk locations being in the Los Angeles International Airport, downtown and the ports areas; diesel particulate matter is the main risk driver for air toxics cancer risk; goods movement and transportation corridors have the highest air toxics cancer risks; and the chronic noncancer risk was estimated for the first time with a chronic hazard index of approximately 5 to 9 across all 10 fixed stations.⁵⁴

Existing Conditions

Existing Emissions

Culver City is a mix of residential, commercial, retail, office, industrial, school, recreational, and open space land uses. Everyday operational activities at these residential and non-residential uses result in the emission of air pollutants associated with vehicle trips, landscaping equipment, on-site combustion of natural gas for heating and cooking, and fugitive emissions of VOCs from the use of aerosol products and coatings and landscaping. However, data with respect to the exact activity level (i.e., utility consumption, trip generation) and building energy standards for each residential or business use is not obtainable. Therefore, emissions estimates for existing uses are based generally on default parameters in the California Emissions Estimator (CalEEMod, version 2022.1) for area and building energy source emissions. The emissions estimates for existing uses also assumes no wood stoves and CalEEMod default usage for fireplaces and assuming a municipal solid waste diversion rate of 50 percent in compliance with Assembly Bill (AB) 939 and Senate Bill (SB) 1016. (See Section 4.18, *Utilities and Service Systems*, of this PEIR, for additional information regarding AB 939 and SB 1016.) Existing emissions for

⁵³ Ibid.

⁵⁴ South Coast Air Quality Management District. 2021a. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin MATES V.

mobile sources are based on vehicle miles traveled (VMT)⁵⁵ and on-road mobile source emission factors from the CARB on-road vehicle emissions factors (EMFAC2021) model. **Table 4.2-5, Estimated Existing Regional Operational Emissions**, presents the regional emissions from the existing development in Culver City.

**TABLE 4.2-5
ESTIMATED EXISTING REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)**

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Existing Development (2016)						
Area (Consumer Products, Fireplaces, Landscaping)	5,454	307	6,754	9	622	622
Energy (Natural Gas)	12	207	156	1	16	16
Mobile (Based on 2019 VMT)	850	2,186	8,617	18	1,353	366
Total Regional Emissions^a	6,316	2,700	15,527	28	1,991	1,004

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this PEIR.

SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT data).

Existing Health Risks from Toxics Air Contaminants

As part of the SCAQMD MATES V, the SCAQMD has released a mapping tool that shows regional trends in estimated outdoor cancer risk from TAC emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). The background potential cancer risk per million people in Culver City is estimated in the range of 460 in one million in the western end of the City and 468 in the northern end of the City (compared to an overall Air Basin-wide risk of 455 in one million [multiple exposure pathways] for the average of 10 fixed monitoring sites).⁵⁶ Generally, the risk from air toxics is lower near the coastline and increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, rail yards and ports).

Sensitive Populations and Receptors

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. SCAQMD defines sensitive receptors as any residence (including private homes, condominiums, apartments, and other living quarters), schools, preschools, daycare centers and health facilities such as hospitals or retirement and nursing homes. It also includes long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

⁵⁵ Fehr & Peers, 2024.

⁵⁶ SCAQMD, n.d., Multiple Air Toxics Exposure Study, MATES V Data Visualization Tool, Cancer Risk. <https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CCancer-Risk>. Accessed December 2023.

Because the Project is a planning document that does not include exact locations, sizes, or land use type for any individual projects that will occur within the city under the General Plan and Zoning Code Updates, there are no specific sensitive locations identified with respect to the Project. As a conservative estimate of impacts, sensitive receptors are anticipated to be located directly adjacent to new development.

4.2.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

Federal Clean Air Act

The federal Clean Air Act governs air quality in the United States. The USEPA is responsible for implementation and enforcement of the Clean Air Act. The Clean Air Act establishes federal NAAQS and specifies future dates for achieving compliance. It also requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The Clean Air Act also mandates that the state submit and implement a state implementation plan (SIP) for each criteria pollutant if the NAAQS for the pollutant has not been achieved. The SIP includes pollution control measures that demonstrate how the standards will be met. The sections of the Clean Air Act which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: O₃; NO₂; CO; SO₂; PM₁₀; and Pb. The NAAQS were amended in July 1997 to include an 8-hour standard for O₃ and to adopt a NAAQS for PM_{2.5}. The NAAQS were also amended in September 2006 to include an established methodology for calculating PM_{2.5} as well as revoking the annual PM₁₀ threshold.

Table 4.2-1 above shows the NAAQS currently in effect for each criteria pollutant. **Table 4.2-6, *South Coast Air Basin Attainment Status (Los Angeles County)***, shows the attainment status of the Air Basin for each criteria pollutant. As shown in Table 4.2-6, the Air Basin is currently in nonattainment of NAAQS for O₃, PM_{2.5}, and in one area of the Air Basin for Pb that does not include Culver City.

In addition to criteria pollutants, Title I also includes air toxics provisions which require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the USEPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

**TABLE 4.2-6
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)**

Pollutant	National Standards	California Standards
O ₃ (1-hour standard)	Non-attainment – Extreme	Non-attainment
O ₃ (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead	Non-attainment (Partial) ^a	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A

NOTE: N/A = not applicable

^a Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

SOURCE: U.S. Environmental Protection Agency 2023b, The Green Book Nonattainment Areas for Criteria Pollutants, last updated on December 1, 2023. <https://www.epa.gov/green-book>. Accessed December 2023; California Air Resources Board 2023i, Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed December 2023.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

State

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include state-identified criteria pollutants, which include sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. CARB has primary responsibility for ensuring the implementation of the California Clean Air Act, responding to the federal Clean Air Act planning requirements applicable to the state, and regulating emissions from motor vehicles and consumer products within the state. Table 4.2-1 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants.

Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. Table 4.2-6 provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the State standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles. Because vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant.

California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter (DPM) and other TACs (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In 2008, CARB also approved the Truck and Bus regulation to reduce PM and NO_x emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. For the largest trucks and buses in the fleet, those with a GVWR greater than 26,000 pounds, all must be equipped with diesel particulate filters (DPFs) from 2014 and onward, and must have 2010 model year engines by January 1, 2023. For trucks and buses with a GVWR of 14,001 to 26,000 pounds, those with engine model years 14 to 20 years or older must be replaced with 2010 model year engines in accordance with the schedule specified in the regulation.

In addition to limiting exhaust from idling trucks, CARB also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower (hp) such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models (13 CCR, Section 2449). Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with large fleets beginning compliance in 2014, medium fleets in 2017, and small fleets in 2019. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (VDECS) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits (VDECS installation) be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

California Air Resources Board Air Quality and Land Use Handbook

CARB published the Air Quality and Land Use Handbook in 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines, and (4) avoid siting sensitive receptors within 300 feet of a large gasoline dispensing facility (3.6 million gallons per year or more) or 50 feet of a typical gasoline dispensing facility (less than 3.6 million gallons per year).⁵⁷

In April 2017, CARB published a Technical Advisory supplement to the Air Quality and Land Use Handbook recognizing that infill developments as promoted by the State can place sensitive individuals in close proximity to high-volume roadways. The Technical Advisory provides planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways. The strategies include those that reduce traffic emissions, such as vehicle speed reduction mechanisms, including roundabouts, traffic signal management, and speed limit reductions on high-speed roadways. Strategies also include those that increase the dispersion of traffic emissions, such as implementing designs that promote air flow and pollutant dispersion along street corridors (e.g., wider sidewalks, bicycle lanes, streets characterized by buildings of varying heights), solid barriers such as sound walls, and vegetation for pollutant dispersion. Other strategies include those that remove pollution from the air such as indoor high efficiency filtration. This Technical Advisory is not intended as guidance for any specific project, nor does it create any presumption regarding the feasibility of mitigation measures for purposes of compliance with CEQA.⁵⁸

Airborne Toxics Control Measures

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and the OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emissions sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on the results of that review, CARB has promulgated a number of ATCMs, both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emissions

⁵⁷ California Air Resources Board, 2005. Air Quality and Land Use Handbook: A Community Health Perspective.

⁵⁸ California Air Resources Board, 2005. Air Quality and Land Use Handbook: A Community Health Perspective.

standards for off-road diesel construction equipment in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the AB 2588 Air Toxics “Hot Spots” program and SB 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

Advanced Clean Trucks Regulation

In 2020, CARB approved the Advanced Clean Trucks (ACT) regulation (13 CCR, Sections 1963–1963.5 and 2012–2012.3) to accelerate a large-scale transition to zero- and near-zero-emissions medium- and heavy-duty vehicles. The regulation requires manufacturers of medium- and heavy-duty vehicles to sell an increasing percentage of zero-emissions models from 2024 to 2035 with up to 55 percent of Classes 2b–3 trucks, 75 percent of Classes 4–8 trucks, and 40 percent of truck tractor sales. The regulation also includes reporting requirements to provide information that would be used to identify future strategies. The ACT is part of the statewide goal to considerably reduce NOx and PM emissions in accordance with the NAAQS, reduce GHG emissions by 40 percent, and reduce petroleum use by 50 percent by 2030. By transitioning to zero-emissions trucks, the state would move away from petroleum dependency and emit less air pollutants from heavy-duty mobile sources.

Heavy-Duty Engine and Vehicle Omnibus Regulation

CARB’s Heavy-Duty Engine and Vehicle Omnibus Regulation (Omnibus Regulation) was adopted on September 9, 2021, and became effective on December 22, 2021, to drastically cut smog-forming NOx from conventional heavy-duty engines. The Omnibus Regulation will significantly increase the stringency of NOx emissions standards and will also lengthen the useful life and emissions warranty of heavy-duty diesel engines for use in vehicles with a GVWR greater than 10,000 pounds. The more stringent NOx emission standards begin with the 2024 model year engines and become more stringent with 2027 and subsequent model year engines.⁵⁹

Senate Bill 1000

SB 1000 amended California’s Planning and Zoning Law to require local governments to identify disadvantaged communities and incorporate environmental justice into their general plans. The purpose of SB 1000 is to provide transparent public engagement in local government planning and decision making, to reduce pollutants associated with health risk in environmental justice communities, and to promote equitable access to health-inducing benefits such as healthy food options, housing, public facilities, and recreation.

⁵⁹ California Air Resources Board, 2023h. Omnibus Regulation. <https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/omnibus-regulation#:~:text=The%20Heavy%2DDuty%20Engine%20and,from%20conventional%20heavy%2Dduty%20engines>. Accessed January 2024.

The Community Health and Environmental Justice Element identifies SB 1000 Priority Neighborhoods. **Figure 4.2-1, SB 1000 Priority Neighborhoods**, shows the areas in the city that are identified as SB 1000 Priority Neighborhoods. As shown on the figure in dark purple, areas within the Clarkdale and Culver/West neighborhoods are identified as SB 1000 Priority Neighborhoods, which means there is a high proportion of low-income households exposed to high pollution burdens compared to the rest of the state. Culver/West is designated as an SB 1000 Priority Neighborhood because its census tract (tract 28.03) falls in the top quartile of CalEnviroScreen 4.0. Additionally, one block group in the Clarkdale neighborhood (tract 28.01) is low-income and has a high potential pollution burden for diesel particulate matter, and traffic-related air pollution. Two additional block groups in Clarkdale and Fox Hills, shown in light purple on the figure, were identified as Threshold SB 1000 Priority Neighborhoods. These areas had a high pollution burden and, although they are not considered low-income based on American Community Survey data, they are within the margin of error to be considered low-income within the State's established low-income threshold.

Regional

South Coast Air Quality Management District

SCAQMD has jurisdiction over air quality planning for all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The South Coast Air Basin is a subregion within SCAQMD jurisdiction. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

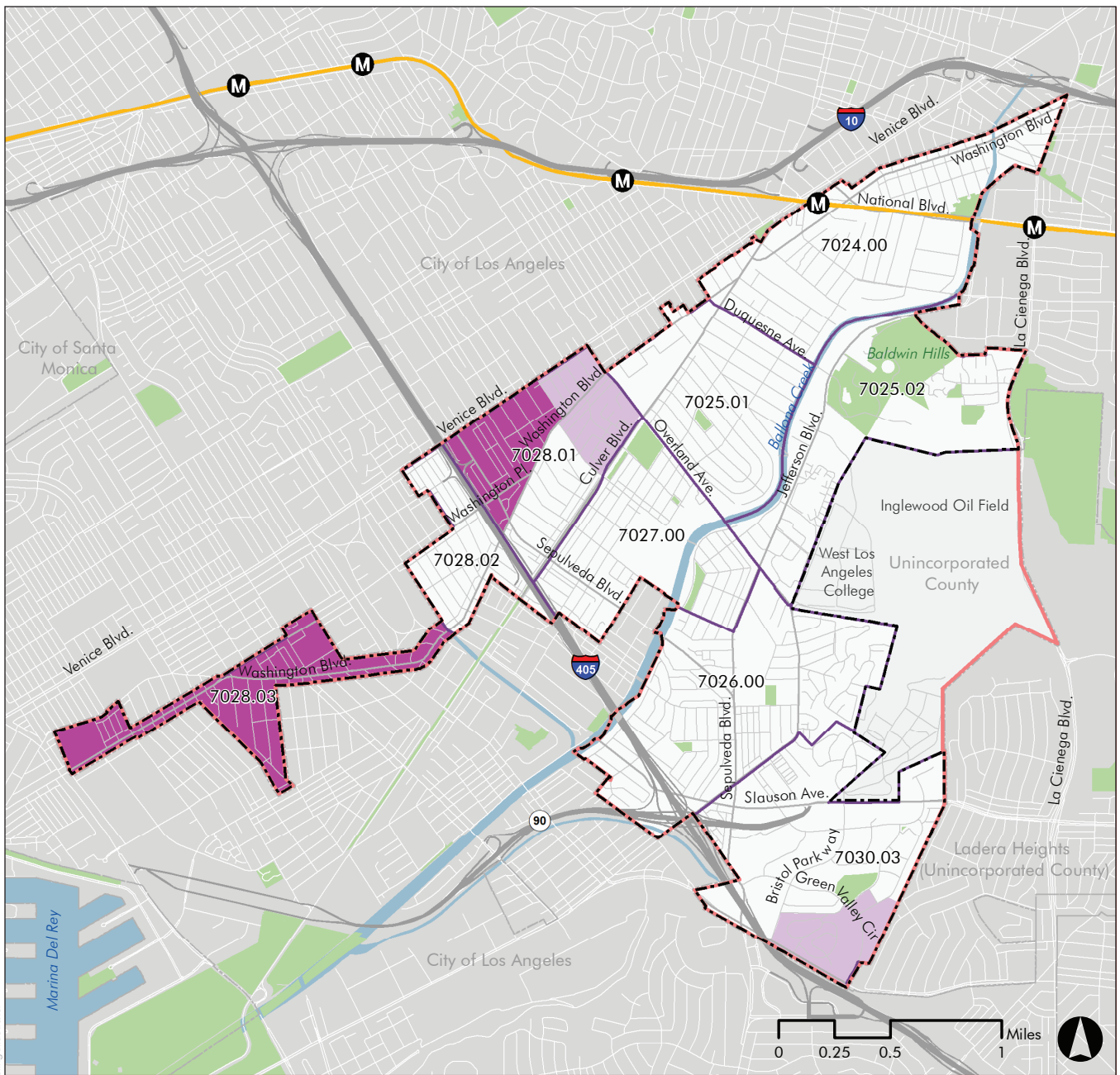
Air Quality Management Plan

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the Air Basin into attainment with the standards in a timely manner. The most current AQMP is the *2022 Air Quality Management Plan (2022 AQMP)*⁶⁰, which was adopted on December 2, 2022. The goal of the 2022 AQMP is to provide a regional roadmap to help the Air Basin achieve the USEPA's NAAQS 2015 8-hour ozone standard (70 parts per billion).

On January 26, 2023, CARB adopted Resolution 23-4, which directs the CARB Executive Officer to submit the 2022 AQMP to the USEPA for inclusion in the California SIP to be effective, for purposes of federal law, after notice and public hearing as required by Section 110(l) of the Clean Air Act and 40 Code of Federal Regulations Section 51.102 and approval by the USEPA. USEPA approval has not yet occurred.

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

⁶⁰ SCAQMD, 2022. 2022 Air Quality Management Plan.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Census Tract
- SB 1000 Priority Neighborhoods
- Threshold SB 1000 Priority Neighborhoods

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SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 4-2.1
SB 1000 Priority Neighborhoods



The 2022 AQMP incorporates the transportation strategy and transportation control measures from Southern California Association of Governments (SCAG) Connect SoCal 2020 (2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* [2020-2045 RTP/SCS]).⁶¹ SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities “conform” to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP.

The 2022 AQMP forecasts future emissions inventories with growth based on SCAG’s 2020-2045 RTP/SCS. According to the 2022 AQMP, the South Coast Air Basin is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and an 8 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels.⁶²

Noteworthy control strategies for mobile sources in the AQMP with potential applicability to reducing short-term emissions from construction activities associated with future development that could occur under the proposed General Plan and Zoning Code Updates include strategies denoted in the 2022 AQMP as MOB-05, MOB-06, and MOB-10, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment.⁶³ Descriptions of these measures are provided below:

MOB-05 – ACCELERATED RETIREMENT OF OLDER LIGHT-DUTY AND MEDIUM-DUTY VEHICLES:

This measure seeks to achieve emission reductions by accelerating retirement of older gasoline- and diesel-powered vehicles with up to 8,500 lbs. gross vehicle weight rating (GVWR).

MOB-06 – ACCELERATED RETIREMENT OF OLDER ON-ROAD HEAVY-DUTY VEHICLES:

This measure seeks additional emission reductions from existing heavy-duty vehicles with GVWR greater than 8,500 lbs through an accelerated vehicle replacement program with zero or low NO_x emission vehicles.

⁶¹ SCAG, 2020. Connect SoCal 2020, Demographics and Growth Forecast, September 2020.

⁶² SCAQMD, 2022. 2022 Air Quality Management Plan, Table 3-3.

⁶³ SCAQMD, 2022. 2022 Air Quality Management Plan, pages 4-21 through 4-30.

MOB-10 – OFF-ROAD MOBILE SOURCE EMISSION REDUCTION CREDIT GENERATION

PROGRAM: This measure seeks to develop mechanisms to incentivize early deployment of Tier 4, low NOx, and zero off-road equipment, where applicable, through the generation of mobile source emission reduction credits.

Rules and Regulations

Several SCAQMD rules adopted to implement portions of the AQMP may apply to future development that could occur under the proposed General Plan and Zoning Code Update. For example, SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. Rules and regulations that are most relevant to future development that could occur under the General Plan and Zoning Code Update include the following:

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

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by USEPA.
- **Rule 445 – Wood Burning Devices:** This rule reduces the emission of particulate matter from wood-burning devices and establishes contingency measures for applicable ozone standards for the reduction of volatile organic compounds. The rule generally prohibits the installation of a wood-burning device into any new development, which means residential or commercial, single or multi-building unit, which begins construction on or after March 9, 2009.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project as a result of project construction activities (i.e., application of architectural coatings, and potential sediment and dirt being tracked onto roads), proposed restaurant uses on-site, and on-site water heaters for the proposed uses:

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1138 – Control of Emissions from Restaurant Operations:** This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM₁₀ emissions by requiring the cleanup of material deposited onto paved roads (including city street), use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIII – New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and State statutes for new and modified sources located in areas that do not meet the Clean Air Act standards ("non-attainment" areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply BACT measures. Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV – Toxics and Other Noncriteria Pollutants: Regulation XI sets emissions standards for TACs and other noncriteria pollutant emissions. The following is a list of rules which may apply to the Project due to the demolition of existing buildings/structures that could contain asbestos and the operation of diesel-powered generators during operations since diesel particulate matter is a TAC:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

- **Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants:** This rule sets requirements to minimize the amount of fugitive dust containing toxic air contaminants that is emitted during earth-moving activities, including, excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable TACs. Rule 1166 is applicable to the transportation of soils with applicable TACs through the SCAB. Applicable requirements include covering the truck loads for soil that contains applicable TACs.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Regulation XXIII– Facility Based Mobile Source Measures: In order to obtain the 80 ppb and 75 ppb 8-hour ozone standards by the 2023 and 2031 applicable attainment dates, respectively, and in support of the AQMP, the SCAQMD formulated Facility Based Mobile Sources Rules to reduce NO_x emissions from indirect sources (e.g., mobile sources generated by, or attracted to facilities). The following rule would apply to future warehouse development that could occur under the proposed General Plan and Zoning Code Update:

- **Rule 2305 – Warehouse Indirect Sources Rule.** Rule 2305 was formally adopted on May 7, 2021.⁶⁴ This rule would reduce local and regional emissions of NO_x and PM, and facilitate local and regional emission reductions associated with warehouses and mobile sources attracted to warehouses in order to assist in meeting the state and federal AAQS for ozone and PM. The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program is a menu-based points system that will require warehouse operators to annually earn a specified number of points by completing actions from a menu. The amount of WAIRE points needed for compliance is calculated based on weighted annual truck trips (WATTs), and an annual variable and stringency rate. WAIRE points earned can be transferred to a different warehouse utilized by the same warehouse operator, to a different compliance year, or between a warehouse owner and a warehouse operator. After each compliance year, warehouse operators will submit an annual WAIRE Report detailing the WAIRE points needed and the points earned for the reporting year. If a warehouse operator fails to earn enough WAIRE points to satisfy the requirement, they are required to pay a mitigation fee per unattained WAIRE point. The Warehouse Indirect Source Rule provides several compliance options that facilities can choose to meet their point requirements including, but not limited to:
 - (1) Ensure truck fleets that serve their facility during operations are cleaner than required by CARB regulations (verified through a voluntary fleet certification program);
 - (2) Directly control the emissions associated with trucks visiting the facility;

⁶⁴ SCAQMD, 2021b. Rule 2305. Warehouse Indirect Source Rule.

- (3) Installation of charging/fueling infrastructure for cleaner trucks and transportation refrigeration units (TRUs), conversion of cargo handling equipment to zero-emissions technologies, etc.;
- (4) Utilization of zero-emissions trucks and incorporation of the infrastructure to support them; and/or
- (5) Mitigation fees if the facilities emissions exceed cap levels set in the Indirect Source Rule.

Local

Culver City General Plan

The Culver City General Plan includes nine elements that have been updated at various points between 1968 and 2014. The current plan does not have an Air Quality Element. However, the Circulation Element (amended through 1995) contains objectives and associated policies focused on traffic flow (Objective #1), public transit (Objective #2), bikeways (Objective #3), pedestrian access (Objective #4), participating in regional system improvements (Implementation Measure #1), and roadway improvement (Implementation Measure #2).⁶⁵ Consistency with these objectives and associated policies would have the potential to reduce single occupancy vehicle trips and VMT, thus reducing air pollutants from mobile sources. The growth projections within the General Plan inform the development of SCAQMD's AQMP.

Culver City Green Building Program

In 2009, Culver City adopted the Mandatory Green Building Program which contains a number of features that would indirectly reduce air pollutant emissions such as enhanced building insulation, low-flow fixtures, efficient lighting and heating, ventilation, and air conditioning (HVAC) systems.⁶⁶ The Culver City Mandatory Green Building Program also includes a specific feature for parking garages which requires all new lighting to be motion sensor controlled and efficient minimum base level lighting.

4.2.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- | | |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Threshold AQ-1: | Conflict with or obstruct implementation of the applicable air quality plan? |
| Threshold AQ-2: | 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? |

⁶⁵ Culver City. 1995. Culver City General Plan, Circulation Element.

⁶⁶ Culver City. Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations?

Threshold AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

In determining whether an effect is significant, State CEQA Guidelines (Section 15064.7) state that a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, provided that the decision to use such thresholds is supported by substantial evidence. Furthermore, with regard to air quality, Appendix G checklist's air quality section preamble reads:

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

In a February 2018 CEQA Guidance document released by SCAQMD, the SCAQMD further states that:⁶⁷

"Air districts' thresholds provide a clear quantitative benchmark to determine the significance of project and project alternative air quality impacts. They also help identify the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Since one of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of any proposed activities (CEQA Guidelines §15002(a)(1)), use of air district thresholds is a best practice for CEQA impact determinations."

In compliance with State CEQA guidelines and SCAQMD guidance, Culver City uses the SCAQMD's established thresholds for evaluating air quality impacts of proposed projects and assessing the significance of quantifiable impacts as applicable under each Appendix G question. The potential air quality impacts are, therefore, evaluated in consideration of the thresholds adopted by SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance.⁶⁸

Conflict with or Obstruct Implementation of the Applicable Air Quality Plan

The threshold used for determining whether future projects developed under the proposed Project would conflict with or obstruct an applicable air quality plan is qualitative and is based on whether the future projects are consistent with the assumed growth, applicable control measures

⁶⁷ SCAQMD, 2018. Guidance on Frequently Questioned Topics in Roadway Analysis for the California Environmental Quality Act, https://www.aqmd.gov/docs/default-source/ceqa/handbook/roadway-ceqa-guidance_v10.pdf. Accessed December 2023.

⁶⁸ While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Future projects developed under the proposed General Plan and Zoning Code Update would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects. As a result, lead emissions are not further evaluated in this EIR.

and air emission reduction policies in the AQMP. Therefore, future projects developed under the proposed General Plan and Zoning Code Updates would have a significant impact if they would:

- Conflict with or obstruct implementation of the AQMP or any other adopted regional and local plans adopted for reducing air quality impacts.

Cumulatively Considerable Net Increase in Criteria Pollutants

Construction

Given that construction impacts are temporary and limited to the construction phase, SCAQMD has established numerical thresholds of significance for construction air pollutant emissions specific to construction activity. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.⁶⁹ Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, future projects developed under the proposed General Plan and Zoning Code Updates would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily emissions thresholds:⁷⁰
 - 75 pounds per day for VOC
 - 100 pounds per day for NOX
 - 550 pounds per day for CO
 - 150 pounds per day for SO2
 - 150 pounds per day for PM10
 - 55 pounds per day for PM2.5

Operational

The SCAQMD has established numerical thresholds of significance for operation air pollutant emissions. The numerical significance thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.⁷¹ The SCAQMD has established numeric thresholds of significance in part based on Section 182(e) of the Clean Air Act which identifies 10 tons per year of VOC as a significance level for stationary source emissions in extreme non-attainment areas for ozone.⁷² As shown in Table 4.2-6, the Air Basin is designated as extreme non-attainment for ozone. The SCAQMD converted this significance level to pounds per day for ozone precursor emissions (10 tons per year × 2,000 pounds per ton ÷ 365 days per year = 55 pounds per day). The numeric thresholds for other pollutants are also based on federal stationary source significance levels. Based on the thresholds in the SCAQMD CEQA Air

⁶⁹ SCAQMD 1993, South Coast Air Quality Management District, South Coast Air Quality Management District, CEQA Air Quality Handbook (1993), [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed December 2023.

⁷⁰ SCAQMD, 2023. Air Quality Significance Thresholds, revision March 2023.

⁷¹ SCAQMD, 1993. CEQA Air Quality Handbook.

⁷² Ibid.

Quality Handbook, future projects developed under the proposed General Plan and Zoning Code Update would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Operational emissions exceed any of the following SCAQMD prescribed daily regional numeric thresholds:⁷³
 - 55 pounds a day for VOC
 - 55 pounds per day for NO_x
 - 550 pounds per day for CO
 - 150 pounds per day for SO_x
 - 150 pounds per day for PM₁₀
 - 55 pounds per day for PM_{2.5}

Sensitive Receptors

Localized Significance Thresholds (LSTs)

The SCAQMD published its Final Localized Significance Threshold Methodology and Final Methodology to Calculate PM₁₀ and PM_{2.5} Significance Thresholds, recommending that all air quality analyses include a localized assessment of both construction and operational impacts of the Project on nearby sensitive receptors.^{74,75} LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀ and PM_{2.5}. LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of Federal or State AAQS. LSTs are based on the ambient concentrations of that pollutant within the SRA where a project is located and the distance to the nearest sensitive receptor. Culver City is primarily located in SCAQMD SRA 2 (Northwest Los Angeles County Coastal) with the southern portion of Culver City located in SCAQMD SRA 3 (Southwest Los Angeles County Coastal).

In the case of CO and NO₂, if ambient levels are below the air standards for these pollutants, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM₁₀ and PM_{2.5}, both of which are nonattainment pollutants in the Basin. For these latter two pollutants, the significance criteria are the pollutant concentration thresholds presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4 µg/m³ applies to construction emissions (and may apply to operational emissions at aggregate handling facilities). The Rule 1301 threshold of 2.5 µg/m³ applies to non-aggregate handling operational activities.

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. Sensitive receptors could be located in proximity to future projects

⁷³ SCAQMD, 2023. Air Quality Significance Thresholds, revision March 2023.

⁷⁴ SCAQMD, 2006. Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds.

⁷⁵ SCAQMD, 2008. Final Localized Significance Threshold Methodology, July 2008.

developed under the proposed General Plan and Zoning Code Updates and have the potential to be exposed to localized construction and operational emissions.

The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling. If future projects developed under the proposed General Plan and Zoning Code Update would result in exceedance of the following screening criteria LSTs for the above pollutants, this would constitute a significant impact, unless dispersion modeling demonstrates no exceedance of the concentration based standards.

Representative LST screening levels are provided below. Actual screening levels utilized by future development projects should be based on the applicable criteria (i.e., SRA, size, and receptor distance) in the SCAQMD Final Localized Significance Threshold Methodology, Appendix C.

- Representative Construction Screening Levels (5-acre site within 25 meters of sensitive receptors in SRA 2):⁷⁶
 - 123 pounds per day for NO_x⁷⁷
 - 1,531 pounds per day for CO
 - 13 pounds per day for PM10
 - 6 pounds per day for PM2.5
- Representative Operation Screening Levels (5-acre site within 25 meters of sensitive receptors in SRA 2):⁷⁸
 - 123 pounds per day for NO_x⁷⁹
 - 1,531 pounds per day for CO
 - 3 pounds per day for PM10
 - 2 pounds per day for PM2.5

⁷⁶ South Coast Air Quality Management District, 2009, Appendix C - Mass Rate LST Look-up Table.

⁷⁷ The screening criteria for NO_x were developed based on the 1-hour NO₂ CAAQS of 0.18 ppm. However, since the publication of the SCAQMD's guidance, the USEPA has promulgated a 1-hour NO₂ NAAQS of 0.100 ppm based on a 98th percentile value, which is more stringent than the CAAQS. In order to determine if Project emissions would result in an exceedance of the 1-hour NO₂ NAAQS, an approximated LST was estimated to evaluate the federal 1-hour NO₂ standard, as the SCAQMD significance threshold has not been updated to reflect this standard. Calculated by scaling the NO₂ LST for by the ratio of 1-hour NO₂ standards (federal/state) (i.e., 221 lb/day* (0.10/0.18) =123 lb/day).

⁷⁸ South Coast Air Quality Management District, 2009, Appendix C - Mass Rate LST Look-up Table.

⁷⁹ The screening criteria for NO_x were developed based on the 1-hour NO₂ CAAQS of 0.18 ppm. However, since the publication of the SCAQMD's guidance, the USEPA has promulgated a 1-hour NO₂ NAAQS of 0.100 ppm based on a 98th percentile value, which is more stringent than the CAAQS. In order to determine if Project emissions would result in an exceedance of the 1-hour NO₂ NAAQS, an approximated LST was estimated to evaluate the federal 1-hour NO₂ standard, as the SCAQMD significance threshold has not been updated to reflect this standard. Calculated by scaling the NO₂ LST for by the ratio of 1-hour NO₂ standards (federal/state) (i.e., 221 lb/day* (0.10/0.18) =123 lb/day).

Carbon Monoxide Hotspots

With respect to the formation of CO hotspots, the Project would be considered significant if the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

- The Project would cause or contribute to an exceedance of the CAAQS 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively.⁸⁰

Toxic Air Contaminants

Based on the criteria set forth by the SCAQMD, future projects developed under the proposed General Plan and Zoning Code Update would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following would occur:⁸¹

- Future projects developed under the proposed General Plan and Zoning Code Update emit carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Other Emissions

The Initial Study (Appendix A of this Draft PEIR) found less than significant impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people (Threshold AQ-4); therefore, this issue is not evaluated in this section. Please see Appendix A for further discussion.

Methodology

Construction

Construction of future development that could occur from adoption of the proposed General Plan 2045 and Zoning Code Update would have the potential to temporarily emit criteria air pollutant emissions through the use of heavy-duty construction equipment, such as excavators, cranes, and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from project sites. In addition, fugitive dust emissions would result from demolition and various soil-handling activities.

The Project is a planning-level document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Therefore, quantification of emissions associated with buildout cannot be specifically determined at this time. Therefore, the analysis will be based on the potential for construction emissions to exceed threshold values in the context of development intensity and compliance with regulatory emissions standards. For analysis purposes, the square footages modeled for non-residential growth exceed the net change since projected growth would occur primarily from infill development and redevelopment.

⁸⁰ SCAQMD, 2023. Air Quality Significance Thresholds, revision March 2023.

⁸¹ Ibid.

Operational

Regional

Operation of future development that could occur from adoption of the proposed General Plan and Zoning Code Update would generate criteria air pollutant emissions from vehicle trips throughout the City, energy sources, such as natural gas combustion, and area sources, such as operation of landscaping equipment and use of consumer products, including solvents used in non-industrial applications which emit VOCs during their product use, such as cleaning supplies, kitchen aerosols, cosmetics and toiletries. Operational impacts were assessed for the full Project buildout year of 2045, as well as for the existing uses operating in future year 2045. Daily maximum criteria air pollutant emissions were compared with the SCAQMD operational thresholds to determine the operational impacts of the Project.

VMT data, which takes into account mode and trip lengths, was developed for the transportation analysis. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor vehicle fleet mix for the Project based on the CARB EMFAC2021 model and default fuel type. EMFAC2021 was used to generate emissions factors for operational mobile sources based on fuel type and vehicle class. However, traffic reduction policies within the proposed General Plan Mobility Element, to which the regional travel demand model may not be fully sensitive (such as connectivity in neighborhoods, presence of bicycle and pedestrian facilities, and transportation demand management measures), may not be fully reflected in the VMT and emissions estimates. Therefore, estimated mobile source emissions are conservatively higher.

The operational area emissions from the Project were estimated using the CalEEMod software. Area source emissions are based on hearth (i.e., fireplace) emissions, architectural coatings, landscaping equipment, and consumer product usage rates provided in CalEEMod. For future development, CalEEMod default values were used for area source emissions except that wood stoves were removed from the emissions calculations for existing uses and wood fireplaces were removed from new development as they are generally not permitted within SCAQMD's jurisdiction for most new commercial and residential development per SCAQMD Rule 445. Future development is assumed to comply with the Title 24 building energy efficiency standards currently programmed into CalEEMod 2022.1, which is a conservative assumption since future Title 24 standards, typically adopted every three years, would reduce building energy demand for future development permitted in 2026 and later. A municipal solid waste diversion rate of 75 percent for new development is assumed in compliance with AB 341 (refer to Section 4.18, *Utilities and Service Systems*, of this PEIR, for additional information regarding AB 341). Detailed emissions calculations are provided in Appendix B of this PEIR.

Local

Localized Significance Thresholds

The localized effects from the on-site portion of daily operational emissions are dependent on the exact size, nature, and location of an individual land use type, combined with reductions in localized impacts from the removal of existing land use types as applicable (i.e., conversion of light industrial uses). Because no specific development projects are identified under the proposed General Plan and Zoning Code Update, the location of development projects, and the

exact nature of the potential development are unknown, determining localized impacts from operational activities at this time is speculative. Therefore, the analysis of localized impacts is discussed qualitatively in this analysis.

Intersection Hotspot Analysis

Operation of the future development resulting from the Project has the potential to generate traffic congestion and increase delay times at intersection within the local study area. The pollutant of primary concern when assessing the Project's impacts at local intersections is CO because an elevated concentration of CO tends to accumulate near areas of heavy traffic congestion and where average vehicle speeds are low. Tailpipe emissions are of concern when assessing localized impacts of CO along paved roads.

An adverse concentration of CO, known as a "hotspot", would occur if there was an exceedance of the NAAQS or CAAQS. SCAQMD does not currently have guidance for conducting intersection hot spot analysis. However, Caltrans has guidance for evaluating CO hot spots in their Transportation Project-Level Carbon Monoxide Protocol (CO Protocol). Detailed guidance discussing which modeling programs to use, calculating emission rates, receiver placement, calculating 1-hour and 8-hour concentrations, and utilizing background concentrations are provided in the Caltrans' CO Protocol.

The potential for the future development resulting from the Project to cause or contribute to CO hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations.

Toxic Air Contaminants Impacts (Construction and Operations)

Construction and operational activities have the potential to result in health risk impacts (cancer, or other acute or chronic conditions) related to TACs exposure from airborne emissions, specifically the emissions of diesel particulate matter. Health risk is a localized impact based on exposure of sensitive receptors to construction and operational activities that emit TACs. Because there are no specific development projects identified under the proposed General Plan and Zoning Code Update, the location of the development projects, and the exact nature of the development are unknown, determining health risk as this time is speculative. Therefore, the analysis of health risk is discussed qualitatively in this analysis based on the potential for TAC emissions to exceed threshold values in the context of development intensity, proximity to sensitive receptors, and compliance with regulatory emissions standards.

Project Impact Analysis

Conflict With or Obstruct Applicable Air Quality Plan

Threshold AQ-1: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Updates would conflict with or obstruct implementation of the applicable air quality plan.

Impact Statement AQ-1: The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable.

The SCAQMD recommends that, when determining whether a project is consistent with the applicable AQMP, the lead agency should assess whether the project would directly obstruct implementation of the plans by impeding SCAQMD's efforts to achieve attainment with respect to any criteria air pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the plan is based. The SCAQMD numerical significance thresholds for construction and operational emissions are designed for the analysis of individual projects and not for long-term planning documents, such as the proposed General Plan and Zoning Code Update. Emissions are dependent on the exact size, nature, and location of an individual land use type, combined with reductions in localized impacts from the removal of existing land use types, as applicable (i.e., conversion of light industrial uses). Emissions associated with the operation of individual projects could exceed project-specific thresholds established by SCAQMD. SCAQMD guidance indicates that projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and would not interfere with its attainment even if the numerical significance thresholds would be exceeded.⁸²

As discussed above, the SCAQMD has adopted a series of AQMPs to lead the Air Basin into compliance with several criteria air pollutant standards and other federal requirements, while taking into account construction and operational emissions associated with population and economic growth projections provided by SCAG. The 2022 AQMP incorporates population and economic growth projections from SCAG's 2020–2045 RTP/SCS.

CEQA requires that general plans be evaluated for consistency with the AQMP. Because the AQMP strategy is based on projections from local general plans, only new or amended general plan elements, specific plans, or individual projects under the general plan need to undergo a consistency review. Projects considered consistent with the local general plan are consistent with the air quality-related regional plan. Indicators of consistency include:

- **Control Strategies:** Whether implementation of a project would increase the frequency or severity of existing air quality violations; would cause or contribute to new violations; or would delay the timely attainment of AAQS or interim emissions reductions within the AQMP.
- **Growth Projections:** Whether implementation of the project would exceed growth assumptions within the AQMP, which in part, bases its strategy on growth forecasts from local general plans.

⁸² SCAQMD, 1993. *CEQA Air Quality Handbook*, Chapter 12, page 12-1.

Construction

Control Strategies

The Air Basin is designated nonattainment for O₃ and PM_{2.5} under the CAAQS and NAAQS, nonattainment for lead (Los Angeles County only) under the NAAQS, and nonattainment for PM₁₀ under the CAAQS. Long-term growth associated with buildout under the General Plan and Zoning Code Update could result in the emissions of criteria pollutants that exceed SCAQMD thresholds for criteria pollutants. Future development under the General Plan and Zoning Code Update would be required to comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy-duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, as applicable to the type of growth, individual projects that are developed under the General Plan and Zoning Code Update would comply with fleet rules to reduce on-road truck emissions during construction. Compliance with these measures and requirements would be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, the future construction activities under the General Plan and Zoning Code Update would be consistent with the AQMP under control strategies.

Growth Projections

The Project would result in an increase in short-term employment compared to existing conditions. Although future construction activities under the General Plan and Zoning Code Update would generate construction workers, it would not necessarily create new construction jobs; construction-related jobs generated by the Project would likely be filled by employees within the construction industry within Culver City and the greater Los Angeles County region. Construction industry jobs generally have no regular place of business, as construction workers commute to job sites throughout the region, which may change several times a year. Moreover, these jobs would be temporary in nature. Therefore, the construction jobs generated by future construction activities under the General Plan and Zoning Code Update would not conflict with the long-term employment or population projections upon which the AQMPs are based.

Operation

Control Strategies

Future development under the Project would be required to comply with CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and, to the extent applicable, to the growth projections in the 2020–2045 RTP/SCS, which are incorporated into the 2022 AQMP.

As discussed above, the AQMP includes land use and transportation strategies from the 2020–2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The applicable land use strategies include: planning for growth around livable corridors; providing more options for short trips/neighborhood mobility areas; supporting zero emission vehicles and expanding vehicle charging stations; and supporting local sustainability planning. The applicable transportation strategies include: managing through the Transportation Demand Management (TDM) Program and the Transportation System Management (TSM) Plan including

advanced ramp metering, and expansion and integration of the traffic synchronization network; and promoting active transportation. The majority of the transportation strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

Development activities under the General Plan and Zoning Code Update would primarily occur on parcels that already contain some existing residential or non-residential uses. The City's primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the City's commercial corridors through parking management strategies, active street frontage guidelines, and public realm improvements. To support the community's housing vision, the land use vision allows for new residential and mixed-use development within the City's industrial areas. With this approach to accommodating growth, it is anticipated that construction for infill and redevelopment of existing land uses would occur across many areas of the City, including those areas that would maintain land use designations similar to existing conditions.

By distributing growth along corridors, including in areas well served by transit, housing would be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill development and transit-oriented communities (TOC), the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the Inglewood Oil Field (IOF). The General Plan and Zoning Code Update would maintain existing parks and open space resources while continuing to expand these resources in an equitable manner. Therefore, the Project would not conflict with AQMP land use and transportation strategies that are intended to reduce VMT and resulting regional mobile source emissions and would result in a less than significant impact associated with air quality. The General Plan and Zoning Code Update would be consistent with the AQMP under the first indicator.

Growth Projections

The emissions inventory for the Air Basin is formed, in part, by existing city and county general plans. The AQMP is based on population, employment and VMT forecasts by SCAG. A project might be in conflict with the AQMP if the development is greater than that anticipated in the local general plan and SCAG's growth projections. Future development in Culver City that is consistent with the proposed General Plan and Zoning Code Update would increase vehicle trips and VMT that would result in emissions of ozone precursors and particulate matter. Individual projects under the proposed General Plan and Zoning Code Update would be required to undergo subsequent environmental review pursuant to CEQA and would be required to demonstrate compliance with the AQMP. Individual projects would also be required to demonstrate compliance with SCAQMD rules and regulations governing air quality.

Growth projections for population, housing, and jobs under the General Plan and Zoning Code Update were presented in Chapter 2, Section 2.4. The General Plan and Zoning Code Update projects a population of 62,400 persons in 2045, which would be an increase of 21,600 persons, compared to the existing (2020) population and would exceed the SCAG growth forecast of 41,600 persons in 2045.⁸³ The General Plan 2045 and Zoning Code Update also project 28,310 households in 2045, for an increase of 11,310 households compared to the existing (2019) household count, which would exceed the SCAG growth forecast of 18,000 households in 2045.⁸⁴ In addition, the General Plan and Zoning Code Update projects 84,300 jobs in 2045, which would be an increase of 16,260 jobs compared to the existing (2019) job count and would exceed the SCAG growth forecast of 64,100 jobs in 2045.⁸⁵ Implementation of the General Plan 2045 and Zoning Code Update is anticipated to result in a net increase of 12,700 residential units, 3,332,000 square feet of commercial uses, and 364,800 square feet of industrial uses. No change is projected for institutional square footage. Additionally, the General Plan and Zoning Code Update will build more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected transportation and mobility options for people of all ages and abilities.

As required by SB 1000, the Community Health and Environmental Justice Element identifies SB 1000 Priority Neighborhoods (see Figure 4.2-1). The Community Health and Environmental Justice Element also includes a number of policies relevant to air quality. These policies focus on reducing emissions and reducing exposure to pollution at sensitive land uses and would address potential impacts related to conflicts with an applicable air quality plan.

Culver City continues to coordinate with SCAQMD and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of future development under the proposed General Plan and Zoning Code Update would not conflict with or obstruct the implementation of the applicable air quality plan. The proposed General Plan policies listed below would potentially reduce emissions, which would address potential impacts related to conflicts with an applicable air quality plan. Nonetheless, the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would be significant and mitigation measures would be required.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable emissions control strategies and regulations as discussed above. Nonetheless, the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City. Therefore, future development under the Project would result in a significant impact related to conflicts with or obstruction of implementation of the applicable air quality plan and mitigation measures would be required.

⁸³ SCAG, 2020. Connect SoCal 2020, Demographics and Growth Forecast, September 2020.

⁸⁴ SCAG, 2020. Connect SoCal 2020, Demographics and Growth Forecast, September 2020.

⁸⁵ SCAG, 2020. Connect SoCal 2020, Demographics and Growth Forecast, September 2020.

Applicable Proposed General Plan Goals and Policies

Community Health and Environmental Justice Element

Goal CHEJ-2: Exposure to Pollutants. All Culver City occupants and visitors enjoy clean air, water, and soil within residential and commercial neighborhoods, work and education centers, and recreational facilities.

CHEJ-2.1: Air quality monitoring. Monitor and improve poor air quality related to stationary and mobile sources of pollution.

CHEJ-2.2: Inglewood Oil Field. Reduce existing and future pollution burden from oil and gas facilities. Support implementation of an amortization program (such as the Oil Termination Ordinance, or equivalent) for portions of the IOF located within the City limit and further encourage completion of potential amortization program for portions of the IOF outside of, but adjacent to, Culver City.

CHEJ-2.3: Mobile source pollution. Reduce air pollution and vehicle-related emissions, especially from diesel-based trucks, that travel in Culver City.

CHEJ-2.4: Truck route coordination. Coordinate with the City of Los Angeles and Los Angeles County to ensure that Culver City's truck routes do not negatively impact neighboring sensitive land uses in their jurisdictions.

CHEJ-2.5: Regional partnerships to eliminate vehicle emissions. Partner with local jurisdictions and agencies, such as the City of Los Angeles's Transportation Electrification Partnership, to develop plans and advance strategies that foster the transition of the transportation sector from fossil-fueled powered vehicles to zero emission vehicles such as battery-electric or hydrogen fuel-cell electric.

CHEJ-2.6: Minimizing pollution exposure. Support all residents, particularly SB 1000 Priority Neighborhoods, in minimizing their exposure to harmful air pollutants.

CHEJ-2.7: Sensitive land uses. Limit siting new sensitive land uses, such as schools, daycare centers, and playgrounds within 500 feet of freeways and the IOF. For sensitive land uses that cannot be sited at least 500 feet away, require design mitigations including but not limited to:

- Locate air intake systems for HVAC systems as far away from existing air pollution sources as possible.
- Use HEPA filters in the heating, ventilation, and air conditioning systems and develop a maintenance plan to ensure the filtering system is properly maintained.
- For nonresidential buildings, consider using only fixed windows next to any existing sources of pollution.
- Plant landscape barriers between highways and residential areas to reduce noise and air pollution for residents.

CHEJ-2.8: Legacy pollutants. Continue to work with State, federal, and regional agencies to eliminate concentrations of regulated legacy pollutants.

CHEJ-2.9: Climate justice. Ensure SB 1000 Priority Neighborhoods are considered in all future programs related to sustainable development, greenhouse gas mitigation, and climate adaptation.

Conservation Element

Goal C-4: Air quality. Air quality is improved and air pollutant emissions are reduced.

C-4.1: Air quality coordination. Coordinate with agencies at the regional, State, and federal levels to address air quality issues.

C-4.2: Collaborate with the South Coast Air Quality Management District. Work with the South Coast Air Quality Management District to achieve the California Ambient Air Quality Standards and the National Ambient Air Quality Standards.

C-4.3: Siting uses near freeways. Discourage siting of new sensitive uses, such as schools, daycare centers, and hospitals, within 500 feet from the I-405, I-10, and SR-90.

C-4.4: Siting of uses near IOF. Discourage new sensitive uses, such as schools, daycare centers, and hospitals within 500 feet from the oil and gas uses within the IOF.

Goal S-10: Heat and air quality. A City prepared for the combined impacts of extreme heat and poor air quality.

S-10.1: Resilient building design. Support resilient building design by helping residents weatherize homes to keep them cooler/warmer and more energy efficient and to improve indoor air quality.

S-10.4: Coordinated transportation system. Promote a transportation system coordinated with air quality improvements.

Mitigation Measures

Refer to **MM AQ-1** through **MM AQ-5**, under Threshold AQ-2.

Level of Significance after Mitigation

Implementation of Mitigation Measures MM AQ-1 through MM AQ-5 stated above would serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development under the Project. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would remain significant and unavoidable.

Result in Cumulatively Considerable Net Increase in Criteria Pollutant

Threshold AQ-2: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Updates would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Impact Statement AQ-2: The Project would result in a potentially significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable.

Ozone, NO₂ and VOC (as ozone precursors), PM₁₀, and PM_{2.5} are pollutants of concern, as the Air Basin has been designated as a nonattainment area for state ozone, PM₁₀, and PM_{2.5} and as a federal nonattainment area for ozone and PM_{2.5}. The Air Basin is currently in attainment for state and federal CO, SO₂, and NO₂ and federal attainment for PM₁₀. SCAQMD has established numerical significance thresholds for regional emissions during construction and operation. The numerical significance thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health. Future projects developed under the General Plan and Zoning Code Update would potentially cause or contribute to an exceedance of an ambient air quality standard if emissions would exceed the SCAQMD regional significance thresholds during construction or operation. Construction and operational impacts are discussed below.

Construction

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. However, as there are no specific projects currently proposed under the General Plan and Zoning Code Update and there is no knowledge as to timing of construction, location or the exact nature of future projects, analysis of construction emissions would be speculative at best. Information regarding specific development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible.

Applicants for future projects developed under the General Plan and Zoning Code Update would be required to comply with SCAQMD rules and regulations as well as conduct CEQA analyses, if necessary, in order to determine significance based on the individual project specifics. Furthermore, future construction activities under the General Plan and Zoning Code Update would be required to comply with the CARB Air Toxics Control Measure, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location, the CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, and CARB ACT regulation, which all require construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-

emissions on-road truck technologies as they become developed and commercially available. Additionally, construction of future development would be required to comply with SCAQMD rules and regulations including Rule 403 for the control of fugitive dust and Rule 1113 for the control of VOC emissions from architectural coatings. Mandatory compliance with these CARB and SCAQMD rules and regulations would reduce emissions, particularly for NO_x, PM10, and PM2.5, during future construction activities under the General Plan and Zoning Code Update.

The proposed General Plan policies, listed below, would potentially reduce emissions, which could potentially address impacts. However, even with mandatory compliance with CARB and SCAQMD rules regulations, it is possible that some future development projects could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the SCAQMD significance thresholds. Therefore, project-related construction activities could result in a significant regional air quality impact and mitigation measures would be required.

Operation

Operation of future development under the General Plan and Zoning Code Update would generate criteria pollutant emissions from vehicle trips traveling within the City, energy sources such as natural gas combustion, and area sources such as landscaping equipment and consumer products usage. The on-road mobile sources related to the operation of the future development include passenger vehicles, on-site use of off-road equipment, and delivery trucks. VMT data takes into account ridership, mode, and distance on freeways and local streets. Projected emissions resulting from operational activities of both existing and future development under the General Plan and Zoning Code Update are presented in **Table 4.2-7, Estimated Culver City 2045 Regional Operational Emissions.**

**TABLE 4.2-7
 ESTIMATED CULVER CITY 2045 REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)**

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Existing Development plus Culver City General Plan and Zoning Code Update New Development (2045)						
Area (Consumer Products, Fireplaces, Landscaping)	6,014	325	7,796	9	624	622
Energy (Natural Gas)	19	323	220	2	25	25
Mobile (Based on 2045 with GPU VMT)	357	619	3,284	13	1,424	368
Total Regional Emissions^a	6,390	1,267	11,300	24	2,073	1,015
Existing Development (2019)	6,316	2,700	15,527	28	1,991	1,004
Net Change	74	(1,433)	(4,227)	(4)	82	11
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	Yes	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT data).

As shown in Table 4.2-7, the net change in operational emissions from existing conditions (2019) compared to existing plus buildout of new development under the General Plan and Zoning Code Update would not exceed the SCAQMD regional significance thresholds, with the exception of VOC emissions that would exceed the threshold. The net change in emissions at 2045 buildout would be negative for NO_x, CO, and SO_x compared to existing (2019) conditions primarily due to the focus of the General Plan and Zoning Code Update on infill development and revitalization to help Culver City achieve an integrated land use mix that accommodates growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. The increase in VOC emissions is primarily the result of growth in building floor area and residential units, which results in population growth and associated usage of consumer products. The increase in PM10 and PM2.5 emissions, while below the threshold, is primarily the result of growth in building floor area and residential units, which results in population growth and associated growth in total VMT, which generates a net increase in re-entrained roadway fugitive dust emissions.

It should be noted that the SCAQMD thresholds were specifically developed for use in determining significance for individual projects and not for program-level documents, such as the General Plan and Zoning Code Update. Furthermore, development of the new residential and nonresidential uses would be based on market demand and would be constructed over the buildout duration through 2045. Overlapping emissions from the construction and operation of new phased development could occur under the General Plan and Zoning Code Update, and the SCAQMD requires such overlapping emissions to be compared to the numeric thresholds for operations. It is possible that some future development projects could be large enough in scale and/or intensity such that operational emissions and/or overlapping emissions from the construction and operation of new phased development could exceed the SCAQMD significance thresholds and result in a significant regional air quality impact and mitigation measures would be required.

The proposed General Plan policies, listed below, would potentially reduce emissions, which could potentially address impacts. As required by SB 1000, the Community Health and Environmental Justice Element includes a number of policies relevant to air quality, focusing on reducing emissions and reducing exposure to pollution at sensitive land uses. In addition, applicants of future development under the General Plan and Zoning Code Update would be required to conduct CEQA analyses, as necessary, in order to determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable emissions control strategies and regulations as discussed above. Nonetheless, it is possible that some future development

projects could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the SCAQMD significance thresholds. It is also possible that some future development projects requiring discretionary approval could be large enough in scale and/or intensity such that operational emissions and/or overlapping emissions from the construction and operation of new phased development could exceed the SCAQMD significance thresholds. Therefore, future development within the City under the Project would result significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment and mitigation measures would be required.

Health Impacts

Because regional emissions from future development under the General Plan and Zoning Code Update may exceed the SCAQMD regulatory thresholds during construction and/or operational activities, there is the potential that these emissions would exceed the CAAQS and NAAQS thus resulting in a health impact. Without knowing the exact specifications for all projects that may be developed under the proposed General Plan and Zoning Code Update, there is no way to accurately calculate the potential for health impacts from the overall Project. As applicable, individual projects would be required to provide their own environmental assessments to determine health impacts from the construction and operation of their projects. Because there is no way to determine the potential for these projects to affect health of sensitive receptors within Culver City, the Project would result in a potentially significant health impact.

Applicable Proposed General Plan Goals and Policies

Community Health and Environmental Justice Element

Goal CHEJ-2: Exposure to Pollutants. All Culver City occupants and visitors enjoy clean air, water, and soil within residential and commercial neighborhoods, work and education centers, and recreational facilities.

CHEJ-2.3: Mobile source pollution. Reduce air pollution and vehicle-related emissions, especially from diesel-based trucks, that travel in Culver City.

CHEJ-2.4: Truck route coordination. Coordinate with the City of Los Angeles and Los Angeles County to ensure that Culver City's truck routes do not negatively impact neighboring sensitive land uses in their jurisdictions.

CHEJ-2.5: Regional partnerships to eliminate vehicle emissions. Partner with local jurisdictions and agencies, such as the City of Los Angeles's Transportation Electrification Partnership, to develop plans and advance strategies that foster the transition of the transportation sector from fossil-fueled powered vehicles to zero emission vehicles such as battery-electric or hydrogen fuel-cell electric.

CHEJ-2.8: Legacy pollutants. Continue to work with State, federal, and regional agencies to eliminate concentrations of regulated legacy pollutants.

CHEJ-2.9: Climate justice. Ensure SB 1000 Priority Neighborhoods are considered in all future programs related to sustainable development, greenhouse gas mitigation, and climate adaptation.

Conservation Element

Goal C-4: Air quality. Air quality is improved and air pollutant emissions are reduced.

C-4.1: Air quality coordination. Coordinate with agencies at the regional, State, and federal levels to address air quality issues.

C-4.2: Collaborate with the South Coast Air Quality Management District. Work with the South Coast Air Quality Management District to achieve the California Ambient Air Quality Standards and the National Ambient Air Quality Standards.

Goal S-10: Heat and air quality. A City prepared for the combined impacts of extreme heat and poor air quality.

S-10.1: Resilient building design. Support resilient building design by helping residents weatherize homes to keep them cooler/warmer and more energy efficient and to improve indoor air quality.

S-10.4: Coordinated transportation system. Promote a transportation system coordinated with air quality improvements.

Mitigation Measures

The Project would result in a potentially significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds. Therefore, the following mitigation measures would be required.

Construction

MM AQ-1: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of NO_x, CO, PM₁₀ and/or PM_{2.5} shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment

in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super-Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.

Operations

MM AQ-3: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, show on the building plans that all major appliances (dishwashers, refrigerators, clothes washers, and dryers) to be provided/installed are Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star or equivalent appliances shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

MM AQ-4: Applicants for new residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the feature below has been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

- For multifamily dwellings, electric vehicle charging shall be provided as specified in Section A4.106.8.2 (Residential Voluntary Measures) of the CALGreen Code (or its successor code).

MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management

District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).
- Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).

Level of Significance After Mitigation

Implementation of Mitigation Measures MM AQ-1 through MM AQ-5 stated above would serve to reduce the severity of the impacts to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, impacts could exceed the significance thresholds and impacts would remain significant and unavoidable.

Expose Sensitive Receptors to Substantial Pollutant Concentrations

Threshold AQ-3: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Updates would expose sensitive receptors to substantial pollutant concentrations.

Impact Statement AQ-3: The Project would result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. Implementation of mitigation measures would help to reduce the severity of the impacts. However, impacts would remain significant and unavoidable.

Criteria air pollutant emissions have the potential to result in health impacts on sensitive receptors located near new development within the Planning Area. As discussed previously, localized impacts are associated with on-site project activities. In addition to these localized impacts, vehicle travel associated with the Planning Area has the potential to result in exposure of sensitive receptors to CO emissions from intersection congestion. Based on the nature and extent of new development, nearby sensitive receptors could be exposed to levels of toxic air contaminants that could result in a potential increase in cancer, acute, and/or chronic risk.

Construction

Construction of future individual projects under the General Plan and Zoning Code Update has the potential to create localized air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling

to and from the project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

The SCAQMD provides guidance for conducting the analysis of localized emissions in their *Localized Significance Threshold Methodology* (June 2003, revised July 2008), which relies on on-site mass emission rate screening tables and project-specific dispersion modeling typically for sites sized one, two, and five acres. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor. The localized significance thresholds are applicable to NO_x, CO, PM₁₀, and PM_{2.5}. Example screening localized significance thresholds for projects 5 acres in size located within 25 meters of the nearest sensitive receptors for SRA 2 are listed in Section 4.2.4, above. Should individual projects exceed applicable screening level thresholds in the SCAQMD *Localized Significance Threshold Methodology* (or successor guidance document), project-specific dispersion modeling may be conducted to demonstrate that no exceedance of the concentration-based thresholds (from which the screening tables are derived) would occur.

Concentrations of TACs, or in federal parlance, HAPs, are also used as indicators of ambient air quality conditions. Sensitive receptors may be located within close proximity to future projects under the Project. SCAQMD recommends that construction health risk assessments be conducted for substantial sources of DPM emissions (e.g., projects with substantial construction activities, such as earth-moving and excavation construction activities) in proximity to sensitive receptors and has provided guidance for analyzing mobile source diesel emissions. Localized DPM emissions strongly correlate with localized PM_{2.5} emissions. However, localized analysis does not directly measure health risk impacts. Therefore, future projects under the General Plan and Zoning Code Update may potentially require project-specific dispersion modeling to evaluate potential health risk impacts associated with construction.

However, there are no specific projects currently proposed under the Project and there is no information regarding specific development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information that would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible and would be speculative at best. Applicants of future project developments under the Project would be required to conduct CEQA analyses, if necessary, in order to determine significance based on the individual project's specifics. Through the individual environmental review process, localized emissions may be quantified and compared against project-specific thresholds. Individual projects that exceed the thresholds would normally be considered significant and require mitigation. Because potential new development could occur close to existing sensitive receptors, the development that would

be accommodated by the General Plan 2045 and Zoning Code Update has the potential to expose sensitive receptors to substantial pollutant concentrations. The proposed General Plan policies, listed below, would potentially reduce emissions, which could potentially address impacts. Nonetheless, construction equipment exhaust combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions or DPM and result in a potentially significant impact and mitigation measures would be required.

Operational

Local Air Quality

The SCAQMD recommends the evaluation of localized air quality impacts on sensitive receptors in the immediate vicinity of a project. However, the impacts are based on specific equipment and operations. Because the exact nature, location, and operation of the future developments are unknown, quantification of potential localized operational impacts and health risks would not be feasible and would be speculative. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing facilities and gasoline-dispensing facilities. Warehouses and distribution centers may generate substantial DPM emissions from off-road equipment use and truck idling. Under the Project, industrial-type land uses such as the aforementioned land uses may be permitted within the City Planning Area. As operation of some of these future developments may occur within proximity to sensitive receptors, there is the potential for localized emissions to exceed the significance thresholds and result in a potentially significant impact.

The General Plan policies, listed below, would potentially reduce emissions, which could potentially address impacts. As required by SB 1000, the Community Health and Environmental Justice Element includes a number of policies relevant to air quality, which focus on reducing emissions and reducing exposure to pollution at sensitive land uses. In addition, applicants for future development under the General Plan 2045 and Zoning Code Update would be required to conduct CEQA analyses, if necessary, in order to determine significance based on the individual project specifics. Through an individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and mitigation measures would be required.

Intersection Hotspot Analysis

The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at project intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

As shown previously in Tables 4.2-2 and 4.2-3, CO levels in the Planning Area are substantially below the federal and state standards. Maximum CO levels in recent years are 1.5 to 2.0 ppm (1-hour average) and 1.0 to 1.3 ppm (8-hour average). CO levels decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Air Basin since 2003⁸⁶ and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 (8-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be up to 6.6 ppm (1-hour average) and 4.5 ppm (8-hour average). Based on the intersection volumes identified at these modeled intersections, if a project's traffic levels exceed 100,000 vehicles per day at any project impacted intersection, there would be the potential for a significant impact and dispersion modeling would need to be conducted to determine the project level impact.

Based on roadway segment volumes under the buildout horizon, the roadway intersection with the maximum potential peak traffic would be that of Sepulveda Boulevard and Jefferson Boulevard. The peak roadway intersection volume at Sepulveda Boulevard and Jefferson Boulevard would be approximately 85,500 vehicles per day from buildout of future development under the General Plan and Zoning Code Update,⁸⁷ which would be below the 100,000 vehicles per day modeled in SCAQMD's 2003 AQMP CO attainment demonstration. Furthermore, CO emissions from vehicles have substantially reduced compared to 2003 era vehicles based on improved vehicle emissions standards. As a result, CO concentrations are expected to be less than those estimated in the 2003 AQMP, which would not exceed the applicable thresholds. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Project would result in a less than significant impact with respect to CO hotspots.

Toxic Air Contaminants

Construction and operation of the Project would result in emissions of TAC, predominantly from diesel particulate emissions from on- and off-road vehicles during construction and from the operation of diesel fueled equipment or generators during operational activities. Because the

⁸⁶ SCAQMD, 2017. *Final 2016 AQMP*, March 2017, p. 2-38.

⁸⁷ Based on ESA Traffic Noise Modeling data and VMT data from Fehr & Peers.

exact nature, location, and operation of the future developments are unknown, and because health risk impacts from TACs are cumulative over the life of the nearby receptors, quantification of potential health risks would be speculative. However, as construction and operation of these future developments may occur within close proximity to sensitive receptors, there is the potential for risk to exceed regulatory levels. Therefore, health risk with respect to the development anticipated by the Project would be potentially significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable emissions control strategies and regulations as discussed above. Nonetheless, it is possible that some future development projects could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment may be required and that construction period emissions could exceed the SCAQMD localized significance thresholds. It is also possible that some future development projects could be large enough in scale and/or intensity such that operational emissions from new development could exceed the SCAQMD localized significance thresholds. Therefore, future development within the City under the Project would result in a significant impact related to exposure of sensitive receptors to substantial pollutant concentrations and mitigation measures would be required.

Applicable Proposed General Plan Goals and Policies

Community Health and Environmental Justice Element

Goal CHEJ-2: Exposure to Pollutants. All Culver City occupants and visitors enjoy clean air, water, and soil within residential and commercial neighborhoods, work and education centers, and recreational facilities.

CHEJ-2.1: Air quality monitoring. Monitor and improve poor air quality related to stationary and mobile sources of pollution.

CHEJ-2.2: Inglewood Oil Field. Reduce existing and future pollution burden from oil and gas facilities. Support implementation of an amortization program (such as the Oil Termination Ordinance, or equivalent) for portions of the IOF located within the City limit and further encourage completion of potential amortization program for portions of the IOF outside of, but adjacent to, Culver City.

CHEJ-2.4: Truck route coordination. Coordinate with the City of Los Angeles and Los Angeles County to ensure that Culver City's truck routes do not negatively impact neighboring sensitive land uses in their jurisdictions.

CHEJ-2.6: Minimizing pollution exposure. Support all residents, particularly SB 1000 Priority Neighborhoods, in minimizing their exposure to harmful air pollutants.

CHEJ-2.7: Sensitive land uses. Limit siting new sensitive land uses, such as schools, daycare centers, and playgrounds within 500 feet of freeways and the IOF. For sensitive land uses that cannot be sited at least 500 feet away, require design mitigations including but not limited to:

- Locate air intake systems for HVAC systems as far away from existing air pollution sources as possible.

- Use HEPA filters in the heating, ventilation, and air conditioning systems and develop a maintenance plan to ensure the filtering system is properly maintained.
- For nonresidential buildings, consider using only fixed windows next to any existing sources of pollution.
- Plant landscape barriers between highways and residential areas to reduce noise and air pollution for residents.

CHEJ-2.8: Legacy pollutants. Continue to work with State, federal, and regional agencies to eliminate concentrations of regulated legacy pollutants.

CHEJ-2.9: Climate justice. Ensure SB 1000 Priority Neighborhoods are considered in all future programs related to sustainable development, greenhouse gas mitigation, and climate adaptation.

Conservation Element

Goal C-4: Air quality. Air quality is improved and air pollutant emissions are reduced.

C-4.1: Air quality coordination. Coordinate with agencies at the regional, State, and federal levels to address air quality issues.

C-4.2: Collaborate with the South Coast Air Quality Management District. Work with the South Coast Air Quality Management District to achieve the California Ambient Air Quality Standards and the National Ambient Air Quality Standards.

C-4.3: Siting uses near freeways. Discourage siting of new sensitive uses, such as schools, daycare centers, and hospitals, within 500 feet from the I-405, I-10, and SR-90.

C-4.4: Siting of uses near IOF. Discourage new sensitive uses, such as schools, daycare centers, and hospitals within 500 feet from the oil and gas uses within the IOF.

Goal S-10: Heat and air quality. A City prepared for the combined impacts of extreme heat and poor air quality.

S-10.1: Resilient building design. Support resilient building design by helping residents weatherize homes to keep them cooler/warmer and more energy efficient and to improve indoor air quality.

Mitigation Measures

The Project would result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. Therefore, the following mitigation measures would be required.

Refer to **MM AQ-1** and **MM AQ-3**, under Threshold AQ-2.

MM AQ-6: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City

Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.

MM AQ-7: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential health risk impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing health risk impacts. If health risk impacts are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM AQ-1, MM AQ-3, MM AQ-6, and MM AQ-7 would serve to reduce the severity of the impacts to exposure of sensitive receptors to substantial pollutant concentrations. However, even with implementation of Mitigation Measures MM AQ-1, MM AQ-3, MM AQ-6, and MM AQ-7, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

4.2.5 Cumulative Impacts Analysis

The SCAQMD recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current AQMP be used to determine its potential cumulative impacts. or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality.⁸⁸

Consistency with Air Quality Management Plan

The SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. CEQA Guidelines Section 15064(h)(3) provides

⁸⁸ SCAQMD, 2003. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, Appendix D.

guidance in determining the significance of cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(3) states in part that:

“A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency ...”

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project’s cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD’s adopted 2022 AQMP. As discussed above in Impact AQ-1, the City’s proposed General Plan and Zoning Code Update would not conflict with AQMP construction, land use, and transportation strategies that are intended to reduce construction emissions, VMT, and resulting regional mobile source emissions. In addition, construction and operation would not conflict with growth projections as Culver City continues to coordinate with SCAQMD and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. As such, a cumulative impact would be less than significant under this criterion.

Project-Specific Impacts

The SCAQMD CEQA Air Quality Handbook states that the “Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects.”⁸⁹ The SCAQMD CEQA Air Quality Handbook also states that “[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District.”⁹⁰ The SCAQMD has provided guidance on addressing the cumulative impacts for air quality. as discussed below:⁹¹

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

⁸⁹ SCAQMD, 1993. *CEQA Air Quality Handbook*, April 1993, page iii.

⁹⁰ SCAQMD, 1993. *CEQA Air Quality Handbook*, April 1993, page 6-1.

⁹¹ SCAQMD, 2003. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, Appendix D.

The SCAQMD recommends evaluating cumulative impacts for individual projects based on whether the project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts for those pollutants for which the Air Basin is in non-attainment. Thus, the cumulative analysis of air quality impacts follows SCAQMD's guidance such that construction or operational Project emissions would be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold. As discussed above in Impact AQ-2, future development that may occur under the proposed General Plan and Zoning Code Update may result in construction or operational emissions that could exceed the SCAQMD significance thresholds. Implementation of Mitigation Measure(s) MM AQ-1 through MM AQ-5 would serve to reduce the severity of the impacts. However, even with implementation of these measures, the cumulative impact would be significant and unavoidable.

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4.3 Biological Resources

4.3.1 Introduction

This section evaluates the potential local and regional environmental impacts on biological resources from implementation of the Project, including potential impacts related to candidate, sensitive, or special status species; riparian and sensitive natural habitat; State and federally protected wetlands; wildlife corridors and nursery sites; and tree preservation policies and ordinances. The section provides context regarding the existing vegetation communities and habitat, sensitive biological resources, and planning issues and proposed improvements, as well as relevant federal, State, and local regulations and programs.

4.3.2 Environmental Setting

Local Setting

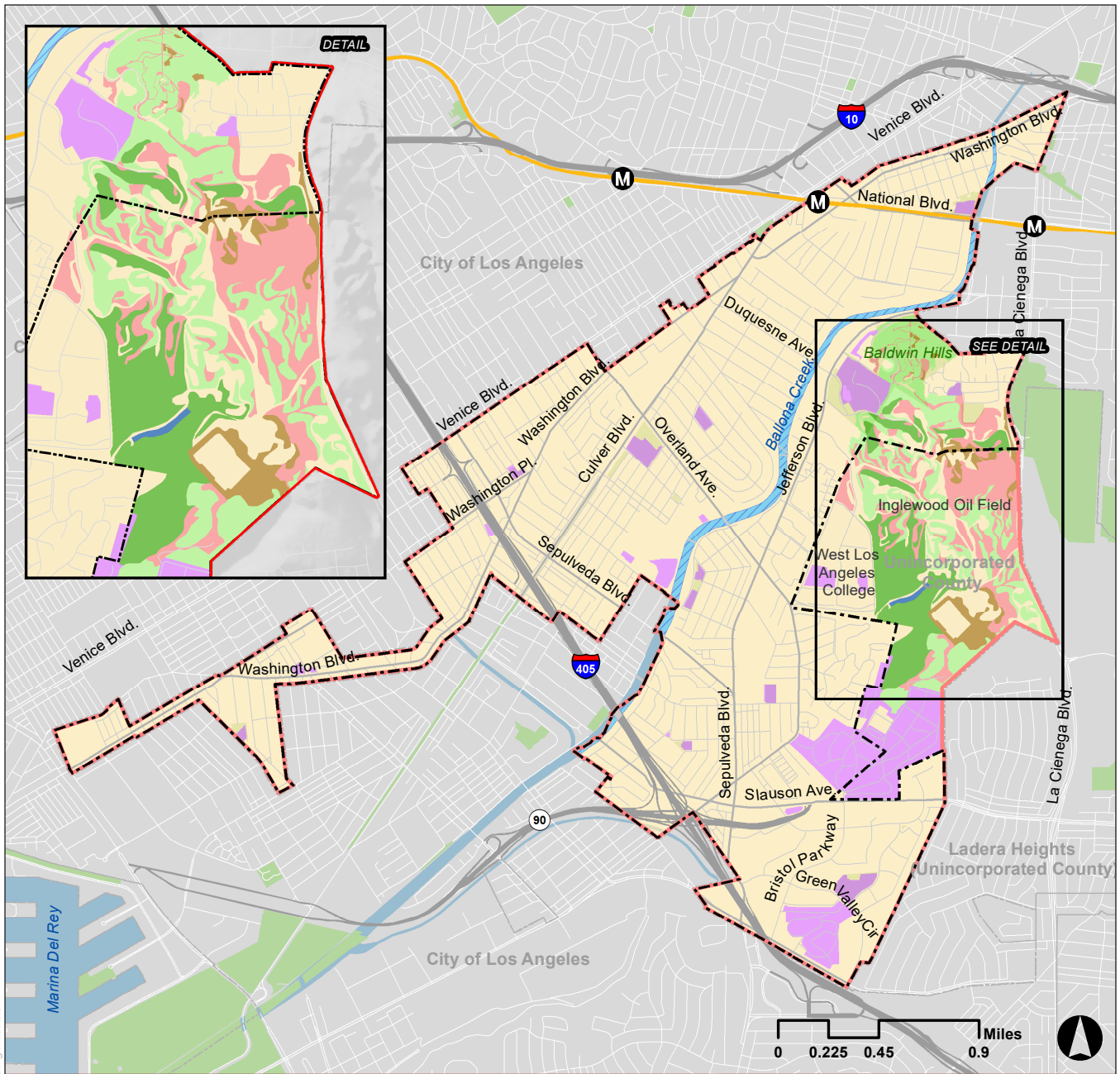
The majority of the Planning Area has been heavily developed and land uses primarily consist of residential neighborhoods interspersed with commercial, industrial, and other non-residential uses. The city is bisected by various roads and major highways, most notably Interstate 405 (I-405) and State Route 90 (SR-90) with Interstate 10 (I-10) near the city's northern city limit. A few undeveloped or semi-open space areas remain, including Blair Hills, Culver City and Fox Hills Parks, Hillside Memorial and Holy Cross Cemeteries, and portions of the Inglewood Oil Field (IOF) within the City and SOI. Concrete-channelized portions of Ballona Creek traverse the Planning Area eventually opening into a soft-bottomed channel downstream. Outside the Planning Area limits, Ballona Creek flows into the Pacific Ocean adjacent to the Ballona Wetlands located in the city of Los Angeles.

Vegetation Communities and Habitat

Various habitats and vegetation communities are present within the Planning Area including Coastal Scrub, Coastal Scrub – Degraded, Channelized Streambed (Ballona Creek), Coast Live Oak Woodland, Non-native/Ornamental, Non-native Tree Stands, and Disturbed. Most of the city is developed and mapped as Urban/Developed while areas outside the city limits within the Planning Area are mostly undeveloped with a combination of vegetation communities listed above (except for channelized streambed). **Figure 4.3-1, *Vegetation Communities and Habitat in Culver City***, depicts communities mapped within the Planning Area, which are described in detail below.

Coastal Scrub

Coastal scrub is restricted to the eastern portion of the Planning Area and is located mostly within the portion of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. Small, remnant patches of this natural community are situated amongst unpaved and gravel access roads and hiking trails, oil infrastructure and various hardscape (e.g., access roads).



- | | |
|----------------------|------------------------------------------|
| City Limits | Natural Communities and Land Uses |
| Sphere of Influence | Channelized Streambed (Ballona Creek) |
| Metro Station | Coastal Scrub |
| E Line (Expo) | Coastal Scrub - Degraded |
| Major Roads | Coast Live Oak Woodland |
| Local Roads | Non-native/Ornamental |
| Parks and Open Space | Non-native Tree Stands |
| Waterbody | Disturbed |
| | Urban/Developed |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2023; ESA, 2019; ESRI, 2021

Culver City General Plan 2045

Figure 4.3-1
Vegetation Communities and Habitat in Culver City



This community is characterized by a shrub layer of plant species such as California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), bush sunflower (*Encelia californica*) and deerweed (*Acmispon glaber*) dominant intermixed with various other plant species including sticky monkey-flower (*Diplacus aurantiacus*), California buckwheat (*Eriogonum fasciculatum*), giant wild rye (*Elymus condensatus*), mock heather (*Ericameria ericioides*), toyon (*Heteromeles arbutifolia*), and black sage (*Salvia mellifera*).

A sparse herbaceous plant layer may be present as well, including various non-native grasses and forbs such as black mustard (*Brassica nigra*), rip-gut brome (*Bromus diandrus*), red brome (*B. rubens*), fennel (*Foeniculum vulgare*), and shortpod mustard (*Hirschfeldia incana*).

Coastal Scrub - Degraded

Coastal scrub – degraded, is also limited to the eastern portion of the Planning Area, within the portion of the IOF in the Planning Area and Kenneth Hahn State Recreation Area, interspersed throughout the remnant patches of coastal scrub natural community. This plant community is similar to the coastal scrub vegetation; however, it supports less than 50 percent cover of native species. Dominant non-native grasses and forbs present within this community include black mustard, castor bean (*Ricinus communis*), fennel, red brome, ripgut brome, and shortpod mustard.

Channelized Streambed (Ballona Creek)

Ballona Creek traverses roughly three linear miles through the Planning Area. The portions of the creek are fully-concrete-lined and up to 200 feet in width, bank-to-bank. Outside city limits, the creek eventually opens up into a soft-bottomed channel with concrete-lined side slopes near Marina Del Rey and terminates at the Pacific Ocean, adjacent to the Ballona Wetlands. The portion of the creek within the Planning Area is virtually devoid of vegetation, aside from weedy, herbaceous species present along the adjacent upland or arising from anomalies in the concrete channel.

Coast Live Oak Woodland

A small, remnant swath of coast live oak woodland was documented within a steep but shallow canyon in the eastern portion of the Planning Area, within the portion of the IOF in the City's Sphere of Influence (SOI). A dense tree and shrub layer characterizes this community with coast live oak (*Quercus agrifolia*) as the dominant plant species in the tree layer; however, the community is otherwise very similar to the adjacent coastal scrub vegetation in species composition.

Non-Native/Ornamental

Non-native/Ornamental vegetation is interspersed throughout the Planning Area and includes partially developed, open space areas including various public parks (i.e., Blair Hills Park, Culver City Park, Fox Hills Park, and Veterans Memorial Park), heavily disturbed portions of the Kenneth Hahn State Recreation Area, and the Hillside Memorial and Holy Cross Cemeteries. Vegetation in these areas generally includes large, maintained lawns, augmented with ornamental trees and shrubs, and cultivated gardens.

Non-Native Tree Stand

Non-native tree stands are present in small patches throughout the IOF and Kenneth Hahn State Recreation Area. Tree (or tree-like plant) species present within these areas include, but are not limited to, Peruvian pepper tree (*Schinus molle*), eucalyptus (*Eucalyptus* spp.), pine (*Pinus* spp.), Mexican fan palm (*Washingtonia robusta*), and Spanish dagger (*Yucca aloifolia*).

Disturbed

Disturbed areas are generally restricted to isolated patches within the eastern portion of the Planning Area, primarily within the boundaries of the portion of the IOF in the Planning Area and the Kenneth Hahn State Recreation Area. Disturbed areas include those with limited vegetation, which tends to be predominately various non-native grasses and forbs such as black mustard, castor bean, fennel, red brome, rip-gut brome and shortpod mustard. Additional weedy plant species found in these areas include wild oats (*Avena* spp.), filarees (*Erodium* spp.), Mediterranean barley (*Hordeum murinum*), Bermuda grass (*Cynodon dactylon*), and wild radish (*Raphanus sativus*).

Urban/Developed

The vast majority of the Planning Area is heavily developed, much of which is devoid of vegetation. Vegetation within these areas is limited to ornamental trees, including street trees, and irrigated landscaping.

Sensitive Biological Resources

A desktop analysis, including a database search and review of available resources, was completed to discern known occurrences of sensitive biological resources within the Planning Area and provide a background for determining what resources have the potential to occur. The database search results are provided in Appendix C.

Special-Status Species

Special-status species are defined as those that, because of their recognized rarity or vulnerability to various forms of habitat loss or population decline, are considered by federal, State, or other agencies to be under threat from human-associated developments. Some of these species receive specific protection that is defined by federal or State endangered species legislation, and others have been designated as special-status based on adopted local policies (i.e., city and county) or the educated opinion of respected resource interest groups (i.e., California Native Plant Society [CNPS]). Special-status species are defined as follows:

- Plants or wildlife listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA);
- Plants or wildlife that meet the definitions of rare or endangered under California Environmental Quality Act (CEQA) Guidelines Section 15380;
- Wildlife designated by California Department of Fish and Wildlife (CDFW) as species of special concern, included on the Watch List, or considered Special Animals.

- Wildlife "fully protected" in California (Fish and Game Code Sections 3511, 4700, and 5050);
- Bird species protected by the Migratory Bird Treaty Act (MBTA);
- Plants that meet the definitions of rare or endangered under CEQA Guidelines Section 15380;
- Plants considered by CNPS and CDFW to be rare, threatened, or endangered (California Rare Plant Rank [CRPR] 1A, 1B, 2A and 2B plants) in California;
- Plants listed by CNPS as those for which more information is needed to determine their status and plants of limited distribution (CRPR 3 and 4 plants); and
- Plants listed as rare under the California Native Plant Protection Act (Fish and Game Code 1900 et seq.)

Figure 4.3-2, California Natural Diversity Database Species Occurrences in Culver City, depicts occurrences of special-status plants and wildlife that have been previously reported within the immediate vicinity of the Planning Area.

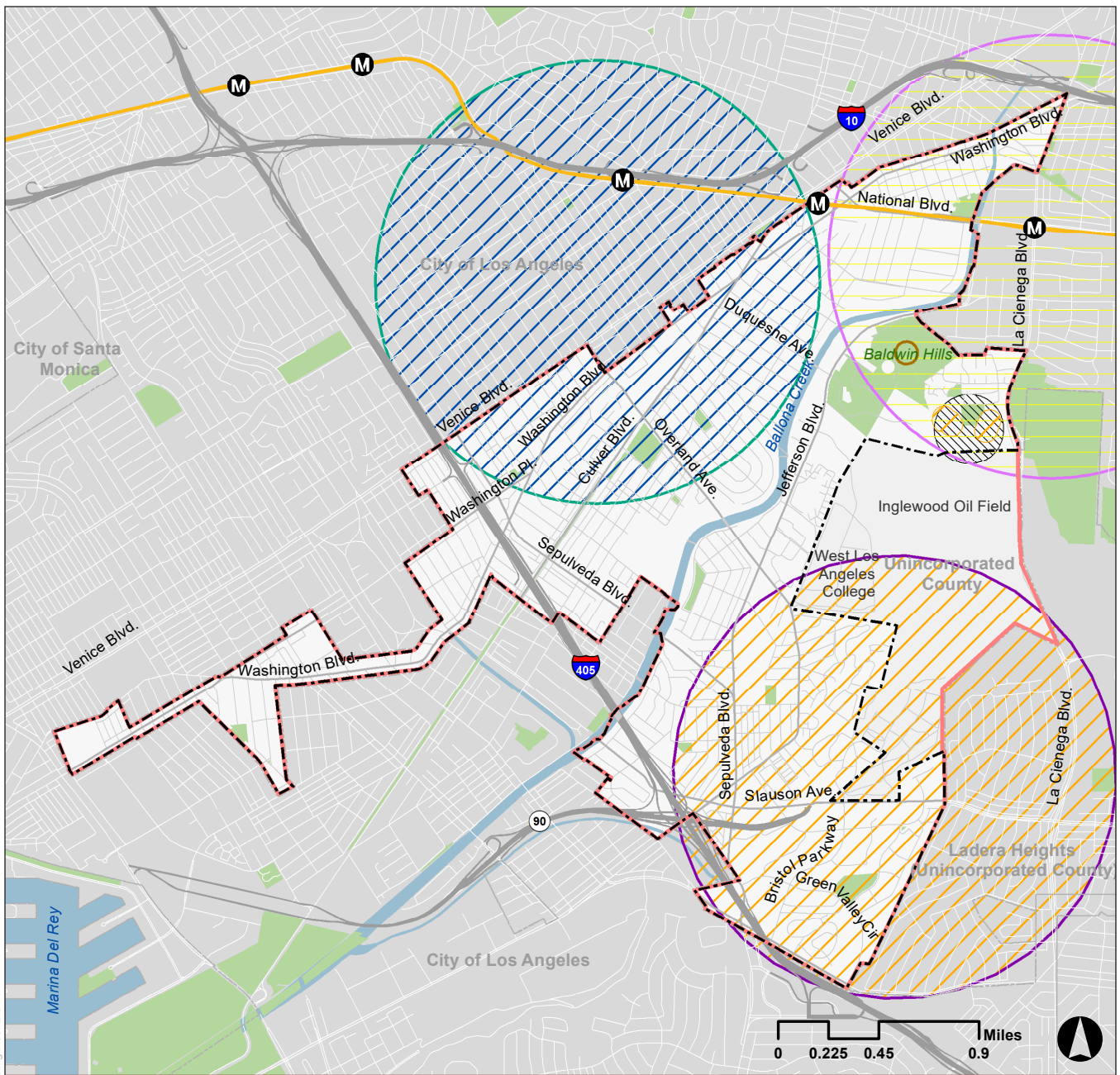
Special-Status Plants

Based on the results of the desktop analysis, five special-status plants have either been detected within the immediate vicinity of the Planning Area or have the potential to occur based on the presence of suitable habitat.¹ These species are presented in **Table 4.3-1, Special-Status Plants in Culver City**, which provides a brief description of each species, the preferred habitat, and the general location(s) within the Planning Area where each has been previously observed or has potential to occur.

Special-Status Wildlife

Based on the results of the desktop analysis, a total of 16 special-status wildlife species have either been detected within the immediate vicinity of the Planning Area or have the potential to occur based on the presence of suitable habitat. These special-status wildlife species are presented in **Table 4.3-2, Special-Status Wildlife in Culver City**, which provides a brief description of each species, the preferred habitat, and the general location(s) within the Planning Area where each has been previously observed or has potential to occur.

¹ Four species have been historically reported within the Planning Area; however, suitable habitat for these species is no longer present. The species include: Ventura marsh milk vetch (*Astragalus pycnostachyus* var. *lanosissimus*), salt marsh birds beak (*Chloropyron maritimum* ssp. *maritimum*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), and salt spring checkerbloom (*Sidalcea neomexicana*). These species are not discussed further.



- City Limits
 - Sphere of Influence
 - Metro Station
 - E Line (Expo)
 - Major Roads
 - Local Roads
 - Parks and Open Space
 - Waterbody
- California Natural Diversity Database Species Potential Occurrences**
- Crotch bumble bee
 - Nuttall's scrub oak
 - hoary bat
 - southern tarplant
 - coastal California gnatcatcher
 - pallid bat
 - western ridged mussel
- Information for Planning and Consultation Species Occurrence**
- coastal California gnatcatcher

SOURCE: City of Culver City, 2021; County of Los Angeles, 2023; USFWS, 2019; CDFW, 2019; ESRI, 2021

Culver City General Plan 2045

Figure 4.3-2
California Natural Diversity Database Species Occurrences in Culver City



**TABLE 4.3-1
 SPECIAL-STATUS PLANTS IN CULVER CITY**

Species	Status/Element Ranking	Habitat	Potential within Planning Area
Southern tarplant (<i>Centromadia parryi</i> ssp. <i>australis</i>)	CRPR 1B	Generally, this species is associated with wetlands, such as vernal pools; however, it is commonly found in heavily disturbed areas within or adjacent to scrub, chaparral and grassland communities.	This species may occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was observed in 1994 within 1 mile of the Kenneth Hahn State Recreation Area (CDFW 2024).
Many-stemmed dudleya (<i>Dudleya multicaulis</i>)	CRPR 1B	This species is known to occur within scrub and chaparral, and cismontane woodland communities.	There is limited potential for this species to occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was historically observed within the Hollywood USGS quadrangle; however, it may have since been destroyed. Furthermore, most occurrences within Los Angeles County are situated at the base of the San Gabriel Mountains, far from the boundary of the GPU Planning Area (Calflora, 2019).
Southern California black walnut (<i>Juglans californica</i>)	CRPR 4	This species is known to occur along riparian corridors; within scrub and chaparral, and cismontane woodland communities.	This species may occur in the scrub and chaparral habitats within portions of the IOF and Kenneth Hahn State Recreation Area.
Nuttall's scrub oak (<i>Quercus dumosa</i>)	CRPR 1B	This species is known to occur within scrub and chaparral, and cismontane woodland communities.	This species was previously detected in the coastal scrub habitat within the Kenneth Hahn State Recreation Area in 2014 (CDFW 2024) and may occur within the IOF, as well.
San Bernardino Aster (<i>Symphotrichum defoliatum</i>)	CRPR 1B	This species is known to occur within meadows and seeps, marshes and swamps, and mesic areas within scrub and chaparral, and woodland and coniferous forest communities.	There is limited potential for this species to occur in the coastal scrub vegetation within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was historically observed within the Cienega neighborhood of Los Angeles; however, it may have been destroyed as a result of urbanization. The close proximity of suitable habitat within the GPU Planning Area to this historical occurrence suggests that this species may occur within areas of suitable habitat (Calflora, 2019).

NOTES: CRPR = California Rare Plant Rank;

CRPR 1B – Plants rare, threatened or endangered in California and elsewhere. CRPR 4 – Plants of limited distribution; Locally Important – Identified as rare in the Baldwin Hills.

SOURCE: California Native Plant Society. 2024. Inventory of Rare and Endangered Plants (online edition, v8-01a). California Native Plant Society. Sacramento, CA. <http://www.rareplants.cnps.org/>. Accessed February 2024.

**TABLE 4.3-2
SPECIAL-STATUS WILDLIFE IN CULVER CITY**

Species	Status/Element Ranking ^a	Habitat	Potential within Planning Area
Invertebrates			
Crotch bumble bee (<i>Bombus crotchii</i>)	SCE	This species occurs in various forms of scrub and chaparral communities.	This species has been previously reported within approximately 1 mile of the Kenneth Hahn State Recreation Area and portions of the IOF in the Planning Area, within the Baldwin Hills in 1951 and again in 1953 (CDFW 2024). Marginal habitat for this species is present in the scrub and chaparral habitat within these areas.
Reptiles			
Coastal western whiptail (<i>Aspidoscelis tigris</i> ssp. <i>stejnegeri</i>)	SSC	This species occurs in various forms of scrub and chaparral, and cismontane woodland communities.	This species has the potential to occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
Coast horned lizard (<i>Phrynosoma coronatum</i> ssp. <i>blainvillei</i>)	SSC	This species occurs in various forms of scrub and chaparral communities.	This species has the potential to occur in the scrub and chaparral habitat within portions of portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
Birds			
Cooper's hawk (<i>Accipiter cooperii</i>)	WL	This species forages in a variety of habitats, including scrub and chaparral and grassland communities and utilizes various trees, both native and ornamental for nesting.	This species may forage and nest within the various habitats present within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps</i>)	WL	This species forages and nests within various scrub and chaparral communities on rocky, steep slopes.	This species may forage and nest in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
Northern harrier (<i>Circus cyaneus</i>)	SSC	This species forages in a variety of habitats including scrub and chaparral and grassland communities, and utilizes various trees, both native and ornamental for nesting.	This species may forage and nest within the various habitats present within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
White-tailed kite (<i>Elanus leucurus</i>)	FP	This species is most commonly found foraging within open grassland communities and utilizes nearby trees, both native and ornamental, to nest.	This species could forage within the various habitats present within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area, but the habitat has low suitability.

Species	Status/Element Ranking ^a	Habitat	Potential within Planning Area
Loggerhead shrike (<i>Lanius ludovicianus</i>)	SSC	This species can be found foraging and nesting within scrub, chaparral, and grassland communities.	This species may forage and nest within the various habitats present within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
California horned lark (<i>Eremophila alpestris</i> ssp. <i>actia</i>)	WL	This species can be found foraging and nesting within grassland communities.	This species could forage and nest within the various habitats present within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
Coastal cactus wren (<i>Campylorhynchus brunneicapillus</i> ssp. <i>coyesi</i>)	SSC	This species can be found foraging or nesting in coastal scrub communities, primarily those supporting cactus species (<i>Cylindropuntia</i> spp. and <i>Opuntia</i> spp.).	This species may forage and nest in the coastal scrub habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. A large population of this species was recorded as occurring within the greater Baldwin Hills area until the early 1990s, last documented in 1996. It is thought that this population may be destroyed (Cooper et al 2012).
Coastal California gnatcatcher (<i>Poliottila californica</i>)	FT, SSC	This species is most commonly found foraging and nesting within coastal scrub communities, in particular, those dominated by California sagebrush (<i>Artemisia californica</i>) with gentle slopes.	This species has the potential to forage and nest in the coastal scrub vegetation within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species has been previously documented within the IOF on two occasions, in 1980 (CDFW 2024) and again in 2014 (USFWS 2024).
Mammals			
Pallid bat (<i>Antrozous pallidus</i>)	SSC, SA	This species occurs in various scrub and chaparral, cismontane woodland communities, and roosts in abandoned buildings/structures, metal clad structures and tree cavities.	This species may forage and nest in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was documented within 1 mile of the Planning Area in 1925 and again in 1932 (CDFW 2024).
Hoary bat (<i>Lasiurus cinereus</i>)	SA	This species occurs in various scrub and chaparral, cismontane woodland communities; and roosts within coniferous and deciduous trees.	This species may forage and nest in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was documented within 1 mile of the Planning Area in 1939 (CDFW 2024).
San Diego black-tailed jackrabbit (<i>Lepus californicus</i> ssp. <i>bennettii</i>)	SSC	This species occurs in various forms of scrub, chaparral and grassland/agricultural communities.	This species may occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.

Species	Status/Element Ranking ^a	Habitat	Potential within Planning Area
Los Angeles pocket mouse (<i>Perognathus longimembris</i> ssp. <i>brevinatus</i>)	SSC	This species occurs in various forms of scrub, chaparral and grassland communities.	This species may occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area.
San Diego desert woodrat (<i>Neotoma lepida</i> ssp. <i>intermedia</i>)	SSC	This species occurs in various forms of scrub, chaparral and grassland communities.	This species may occur in the scrub and chaparral habitat within portions of the IOF in the Planning Area and Kenneth Hahn State Recreation Area. This species was documented within the greater Baldwin Hills area in 2001 (LA County 2008).

NOTES:

^a Federal: FT – Federally Threatened; State: SCE – State Candidate Endangered; SSC – Species of Special Concern, SA – Special Animal, FP – Fully Protected, WL – Watch List.

SOURCE: California Department of Fish and Wildlife. 2024. California Natural Diversity Database (CNDDB). <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>. Accessed February 2024.

Los Angeles County. 2008. Baldwin Hills Community Standards District, Public Draft Environmental Impact Report. State Clearinghouse No. 2007061133. November 2008.

U.S. Fish and Wildlife Service. 2023a. Critical Habitat Portal. <http://ecos.fws.gov/crithab/>. Accessed November 2023.

Nesting Birds

Various birds protected by the MBTA may utilize the Planning Area to forage and breed. Most avian species, such as the California scrub jay (*Aphelocoma californica*), California quail (*Callipepla californica*), wrenit (*Chamaea fasciata*), northern flicker (*Colaptes auratus*), spotted towhee (*Pipilo maculatus*), and bushtit (*Psaltriparus minimus*) are more likely to occur within the native scrub and chaparral habitat located within the Kenneth Hahn State Recreation Area and the IOF; however, others, such as the red-tailed hawk (*Buteo jamaicensis*), common raven (*Corvus corax*), northern mockingbird (*Mimus polyglottos*), and mourning dove (*Zenaida macroura*) are regularly observed foraging and nesting in heavily developed residential areas, dominated by mature street trees and other ornamentally planted trees and shrubs found throughout much of the Planning Area.

Sensitive Natural Communities

CDFW defines sensitive natural communities as those that have a reduced range or are imperiled as a result of development, agriculture, energy production and mining, or an influx of invasive and other non-native species. For rarity, the ranking involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity. No sensitive natural communities are present within the Planning Area.

Critical Habitat

No critical habitat is present within the Planning Area. The closest critical habitat is for the western snowy plover (*Charadrius nivosus* ssp. *nivosus*) and is located approximately 2.75 miles to the southwest, south of Marina del Rey, near Los Angeles International Airport.²

Wetlands and Other Jurisdictional Features

Based on the vegetation communities within the Planning Area and review of the National Wetlands Inventory,³ wetlands are not known to be present within the Planning Area. However, certain activities within the channelized portion of Ballona Creek would be regulated by agencies such as the U.S. Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (RWQCB), and CDFW. Therefore, any impact to the bed and banks of the channel would require coordination with these regulatory agencies and compliance with applicable regulations when planning new development or when planning any improvement, including restoration of the creek, which may affect jurisdictional areas associated with the creek.

Wildlife Corridors

Corridors provide opportunities for individual animals or groups of animals to disperse or migrate among areas of suitable habitat. These areas of suitable habitat may be extensive but are otherwise partially or wholly separated by unsuitable habitat. Appropriate cover, minimum physical dimensions, and tolerably low levels of disturbance and mortality risk (e.g., limited night lighting and noise, low vehicular traffic levels) are common requirements for corridors. Resources and conditions in corridors may be quite different than in the areas they connect, but if used by the wildlife species of interest, the corridor would still provide an important function. Corridors adequate for one species may be inadequate for others.

There are no designated or major wildlife movement corridors within or adjacent to the Planning Area as identified by Los Angeles County Department of Regional Planning (2014) or South Coast Wildlands.⁴ Terrestrial wildlife movement between the Project site and other areas of open space are extremely constrained due to urbanization of the area.

4.3.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

² U.S. Fish and Wildlife Service. 2023a. Critical Habitat Portal. <http://ecos.fws.gov/crithab/>. Accessed November 2023.

³ USFWS, 2023b. National Wetlands Inventory. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed November 1, 2023.

⁴ South Coast Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. Produced in cooperation with partners in the South Coast Missing Linkages Initiative. Available online [<http://www.scwildlands.org>.]

Federal

The Federal Endangered Species Act of 1973 (USC, Title 16, Sections 1531 through 1543)

The FESA of 1973 and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. In addition, the FESA defines species as threatened or endangered and provides regulatory protection for listed species. The FESA also provides a program for the conservation and recovery of threatened and endangered species as well as the conservation of designated critical habitat that the USFWS determines is required for the survival and recovery of these listed species.

Clean Water Act (33 USC 1251 through 1376) Sections 401 and 404 – Waters of the United States

The Clean Water Act (CWA) authorizes various State and federal agencies and tribes to implement programs in order to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Section 404 of the CWA establishes a permit program administered by USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. Section 401 requires a landowner or other entity seeking to obtain a federal license or permit that allows activities resulting in a discharge to waters of the United States to also obtain a state water quality certification.

Migratory Bird Treaty Act (16 USC 703 through 711)

The MBTA (16 U.S. Code [USC] Sections 703–711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the USFWS and CDFW. The MBTA makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill migratory birds, and prohibits the removal of nests occupied by migratory birds. Over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species are protected under the MBTA.

In practice, federal permits potentially impacting migratory birds typically have conditions that require pre-disturbance surveys for nesting birds, and, in the event nesting is observed, a buffer area with a specified radius must be established within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. Activities that would require such a permit would include, but not be limited to, the destruction of migratory bird nesting habitat during the nesting season when eggs or young are likely to be present. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., presence of busy roads, intervening topography), and is based on the professional judgment of a qualified biologist.

State

California Endangered Species Act – California Fish and Game Code Section 2050 et seq.

The CESA establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. For projects that would affect a listed

species under both the CESA and the FESA, compliance with the FESA would satisfy the CESA if the CDFW determines that the federal incidental take authorization is “consistent” with the CESA under California Fish and Game Code Section 2080.1. For projects that would result in take of a species listed under the CESA only, the project operator would have to apply for a take permit under Section 2081(b).

California State Fish and Game Code Section 1602

Under this section of the California Fish and Game Code, the landowner or other entity is required to notify CDFW prior to undertaking any project that would divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake.

California Fully Protected Species

California fully protected species are described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species. The CDFW is unable to authorize incidental take of fully protected species when activities are proposed in areas inhabited by those species.

California State Fish and Game Code Sections 2080 and 2081

Section 2080 of the California Fish and Game Code states that “No person shall import into this state [California], export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission [State Fish and Game Commission] determines to be an endangered species or threatened species, or attempt any of those acts, except as otherwise provided in this chapter, or the Native Plant Protection Act, or the California Desert Native Plants Act.”

California State Fish and Game Code Sections 3503, 3503.5, 3513, and 3800

Sections 3503, 3503.5, and 3800 of the California Fish and Game Code prohibit the take or possession of birds, their nests, or eggs. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." Such a take would also violate federal law protecting migratory birds. Incidental Take Permits (i.e., Management Agreements) are required from the CDFW for projects that may result in the incidental take of species listed by California as endangered, threatened, or candidate species. The permits require that impacts to protected species be minimized to the extent possible and mitigated to a level of insignificance.

Clean Water Act, Section 401

Under Section 401 of the CWA, the local RWQCB (for this project, the Los Angeles RWQCB) must certify that actions receiving authorization under Section 404 of the CWA or other federal licenses and permits that may result in any discharge into waters of the United States also meet state water quality standards. The RWQCB requires projects to avoid impacts to wetlands if feasible and requires that projects do not result in a net loss of wetland acreage or a net loss of wetland function and values. Compensatory mitigation for impacts to wetlands and/or waters of the state is typically required.

Porter-Cologne Water Quality Control Act

The RWQCB also has jurisdiction over waters not considered waters of the U.S. Dredging, filling, or excavation of state-only waters constitutes a discharge of waste and prospective dischargers are required to obtain authorization through an Order of Waste Discharge or waiver thereof from the RWQCB and to comply with other requirements of Porter-Cologne Act.

Regional

Los Angeles County General Plan

The Los Angeles County (County) General Plan 2035 provides the policy framework for how and where the unincorporated portions of the county will grow through the year 2035. The current County General Plan was adopted in 2015. The County General Plan Conservation and Natural Resources Element (Chapter 9) guides the long-term conservation of natural resources and preservation of available open space areas. Section III of Chapter 9 describes the goals and policies for biological resources occurring within unincorporated county land. The main types of biological resources in the unincorporated areas are regional habitat linkages; forests; coastal zone; riparian habitats, streambeds and wetlands; woodlands; chaparral; desert shrubland; alpine habitats; Significant Ecological Areas (SEAs); and Coastal Resource Areas (CRAs). The County General Plan works to protect and enhance these resources and ensure that the legacy of the unique biotic diversity is passed on to future generations.

Los Angeles County – Baldwin Hills Community Standards District

On October 28, 2008, the County’s Board of Supervisors adopted the Baldwin Hills Community Standards District (BHCS D) and certified the associated Environmental Impact Report. The BHCS D establishes development standards and operating procedures for oil and gas operations in the unincorporated County portion of the IOF, which includes approximately 900 acres and over 700 wells. The BHCS D ensures that oil field operations are conducted in a safe manner and are compatible with the surrounding uses, including uses within Culver City and the City’s portion of the IOF. The County is currently in the process of amending the BHCS D to effectively prohibit any new drilling, redrilling or deepening within the County’s portion of the IOF and establish oil and gas activities as a nonconforming use.⁵

Los Angeles County Significant Ecological Areas

As part of the Conservation and Open Space and Land Use Elements of the County General Plan, the County has identified and adopted policies since 1970 for the establishment of SEAs. These SEAs were developed to maintain biological diversity by establishing natural biological parameters (key species, habitat types, and linkages) and recommend management practices. The final boundaries and categories for the 21 SEAs (and 9 Coastal Resource Areas) were established in 2015 with the County Board of Supervisors approval of the General Plan 2035. The Planning Area does not include any mapped SEAs. The nearest mapped SEA is located

⁵ Los Angeles County, Long Range Planning Department, 2023. Baldwin Hills Community Standards District Amendment Website. Available at: Baldwin Hills CSD - LA County Planning. Accessed December 2023.

approximately 5.5 miles to the north within the Santa Monica Mountains SEA.⁶ The closest Coastal Resource area is about 2 miles to the southwest within the Ballona Wetlands. SEA regulations are not applicable within the Planning Area.

Los Angeles County Oak Tree Protection Ordinance

Portions of the city's SOI are located within unincorporated Los Angeles County. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significant historical, aesthetic, and ecological resources. The goal of the ordinance is to create favorable conditions for the preservation and propagation of this unique and threatened plant heritage. By making this part of the development process, healthy oak trees will be preserved and maintained. The Los Angeles County Oak Tree Ordinance applies to all unincorporated areas of the County. Trees subject to County permit requirements include those defined by Title 22.14.150 as: "Valley Oak (*Quercus lobata*), Coast Live Oak (*Quercus agrifolia*), any other tree of the oak genus (*Quercus*)" which is 25 inches or more in circumference (eight inches in diameter) as measured four and one-half feet above mean natural grade; or, in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 38 inches (12 inches in diameter) as measured four-and-one-half feet above mean natural grade.

Additionally, the Los Angeles County Oak Tree Ordinance defines the "Protected Zone" of a tree as, "the area within the dripline of an oak tree and extending therefrom to a point at least five feet outside the dripline, or 15 feet from the trunk of a tree, whichever distance is greater" (Title 22.14.150). For the purposes of determining tree impacts, trees that have protected zones that have been encroached upon would also be considered impacted. Under the Los Angeles County Ordinance, a person must obtain a permit to cut, destroy, remove, relocate, inflict damage upon, or encroach into the protected zone of any tree of the oak tree genus that is 8 inches or more in diameter, 4.5 feet above mean natural grade, or in the case of oaks with multiple trunks, a combined diameter of 12 inches or more of the two largest trunks.

Los Angeles Oak Woodlands Conservation Management Plan

To further the County's compliance with Public Resources Code Section 21083.4, which provides for the conservation of oak woodlands, the County adopted the Los Angeles County Oak Woodlands Conservation Management Plan (OWCMP) in 2012. The OWCMP develops a consistent policy for the management of oak woodlands by providing a voluntary conservation strategy in order to meet the requirements of the California Oak Woodlands Conservation Act (AB 242). The OWCMP extends CEQA consideration of impacts to oak woodlands comprised of oaks greater than 5 inches at DBH and recognizes that conservation of oak woodland habitat extends beyond the protection of individual trees.

Los Angeles Hillside Management Areas

The Hillside Management Area (HMA) Ordinance, which is part of the Project, applies to all unincorporated areas that contain terrain with a natural slope of 25 percent or greater. The goal of the ordinance is to ensure that development preserves the physical integrity and scenic value

⁶ Los Angeles County, 2015. General Plan 2035, Figure 9-3. Significant Ecological Areas and Coastal Resource Areas Policy Map. <https://planning.lacounty.gov/generalplan/generalplan>. Accessed November 2023.

of HMAs, provides open space, and enhances community character. Locating development outside of HMAs to the greatest extent feasible will be the first emphasis of sensitive hillside design. Where avoidance is not feasible, development of HMAs will be located in the lowest and flattest areas of the hillside in order to minimize impacts on steeper hillside areas. Last, development will utilize a variety of sensitive hillside design techniques to ensure compatibility with the hillside and enhance community character.

Local

Culver City Urban Forest Master Plan

The Urban Forest Master Plan reflects the commitment of the Culver City community to foster a robust and resilient urban forest today and for the future. The Plan articulates a clear vision for the future of Culver City's urban forest based on analysis of the City's historical and existing urban forest, as well as on synthesis of current research, best management practices and community input. The Plan provides guiding principles for both long-term and day-to-day management, comprehensive tree designations, technical standards, and resources for City and community members. The Plan reflects current best practices, technologies, and city policies while allowing for future revision to maintain its relevance for the next 50 years. The Plan is designed to support Culver City's environmental goals in regards to stormwater management and carbon sequestration; it also envisions increased shade for pedestrians and motorists, improved air quality, and increased opportunity for healthy recreation.

4.3.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold BIO-1:** 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 CDFW or USFWS.
- Threshold BIO -2:** 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 CDFW or USFWS.
- Threshold BIO-3:** Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Threshold BIO-4:** 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 wildlife nursery sites.

Threshold BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Threshold BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Initial Study (Appendix A of this Draft PEIR) found no potentially significant impacts related to conflict with adopted habitat conservation plans or natural community conservation plans (Threshold BIO-6); therefore, this issue is not evaluated in this section. Please see Appendix A for further discussion.

Methodology

This analysis is based on information obtained largely from literature review. The study began with a literature review conducted to determine special-status plant and animal species known to occur in the vicinity of the Planning Area. In accordance with industry accepted standards, database records were reviewed by conducting a query of the California Department Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (2024), CNPS Rare Plant Inventory (2024), and U.S. Fish and Wildlife Service (USFWS) Information Planning and Conservation System (2024) was conducted for the Beverly Hills, Hollywood, Inglewood and Venice USGS 7.5-minute topographic quadrangle maps.⁷ A review of the most current edition (June 2023) of CDFW *California Sensitive Natural Communities* developed for the CNDDDB was conducted to determine if any of the plant communities mapped within the Planning Area are considered sensitive, those with a State Rarity Rank of 1-3.⁸

The following documents prepared for projects located within the vicinity of the Planning Area were also reviewed:

- Baldwin Hills Park, Master Plan;
- Baldwin Hills Community Standards District, Environmental Impact Report;
- Results of Focused Presence/Absence Coastal California Gnatcatcher Surveys for Segment C of the Proposed Park to Playa Trail Project, Los Angeles County, California;
- Results of Special Status Plant Surveys for the Blair Hills Corridor (Segment C) Portion of the Proposed Park to Playa Trail Project, Los Angeles County, California; and

⁷ USFWS. 2024. Information Planning and Conservation System. <https://ipac.ecosphere.fws.gov/location/index>. Accessed February 2024.

⁸ California Department of Fish and Wildlife, California Sensitive Natural Community List, Vegetation Classification and Mapping Program. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline>, accessed November 2023.

- Urban Biodiversity Assessment: Baldwin Hills Biota Update. Los Angeles: University of Southern California for Baldwin Hills Conservancy (Proposition 84) and Baldwin Hills Regional Conservation Authority (Proposition A).⁹

The analysis for each impact discussion considers the following three principal components of the State CEQA Guidelines to determine the potential significant impact under CEQA:

- Magnitude of the impact (e.g., substantial/not substantial)
- Uniqueness of the affected resources (e.g., rarity of the resource); and
- Susceptibility of the affected resource to perturbation (e.g., sensitivity of the resource).

The evaluation of the significance of impacts considers the interrelationship of these three components. Mitigation measures were considered and applied, if necessary, and then a final determination of significance reached. Mitigation measures considered included those recommended by CDFW in response to the Project's Notice of Preparation of a Draft EIR.

Biological resources may either be directly or indirectly affected by a project. Impacts may occur as a result of construction of projects anticipated under the General Plan 2045 and as a result of operation after construction is complete. Furthermore, direct and indirect impacts may either be permanent or temporary. Permanent impacts result in an irreversible impact to or irreversible removal of biological resources, such as the elimination of a plant or animal community or habitat loss. Temporary impacts are those considered reversible, such that biological resources can be successfully restored.

Project Impact Analysis

Adversely Affect Candidate, Sensitive, or Special Status Species

Threshold BIO-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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 CDFW or USFWS.

Impact Statement BIO-1: The Project has the potential to impact existing habitats and associated special-status species within the Planning Area during construction and operation of future development. However, with implementation of Mitigation Measures BIO-1 and BIO-2, the Project would result in less than significant impacts related to special-status species.

General Plan 2045

Construction

Special-Status Species

The vast majority of the Planning Area is heavily developed and contains minimal biological resources; however, fragmented, isolated swathes of coastal scrub and chaparral vegetation

⁹ Longcore, T. (ed). 2016. Urban Biodiversity Assessment: Baldwin Hills Biota Update. Los Angeles: University of Southern California for Baldwin Hills Conservancy (Proposition 84) and Baldwin Hills Regional Conservation Authority (Proposition A).

remain throughout portions of the IOF and Kenneth Hahn State Recreation Area. New development and improvements anticipated as a result of development occurring under the General Plan 2045 within or adjacent to these areas may harm special-status species.

As described above in Tables 4.3-1 and 4.3-2, there are 21 special-status species that have the potential to occur within the Planning Area, where new development consistent with the General Plan 2045 could directly or indirectly impact these biological resources. Adverse impacts on special-status wildlife are generally associated with the degree of habitat loss including a habitat's physical character, quality, and diversity, in addition to abundance of vegetation. As anticipated by the land uses designated in the General Plan 2045, shown on Figure 2-6, *Draft General Plan Land Use Map*, construction of some projects could result in direct removal of suitable wildlife habitat for special-status species (which may include nesting avian species), resulting in the potential mortality of wildlife species existing within the habitat as well as the displacement of more mobile wildlife species to other habitat areas nearby. While the majority of special-status biological resources have a low potential to occur within the Planning Area as result of the largely developed nature of the Planning Area, new development projects could significantly impact these resources, when analyzed on a project-by-project basis due to specific onsite conditions.

However, construction of new projects facilitated by the General Plan 2045 would be required to comply with the proposed Goals and Implementing Policies listed below. Specifically, compliance with Goal C-2 Biological Resources and Goal C-3 Wildlife and Plant Species would require new projects under the 2045 General Plan to identify special-status species located within a new project's impact area including special-status species that are also either State or federally listed as Endangered, Threatened, or Rare.

In addition, future development would be required to comply with all applicable laws, regulations, and ordinances related to special-status species. Development within areas identified as supporting listed special-status species would be required to comply with CESA and/or FESA through applicable regulatory permitting processes. The specific mitigation measures required to allow take of a listed species or to eliminate its habitat would be determined at the time of permitting prior to construction of the individual project. The compensatory mitigation measures would likely include habitat restoration and/or preservation, purchase of habitat at a mitigation bank, payment into lieu fee program credits, or limitations regarding the extent and timing of project construction.

The City is focused on the protection and enhancement of the biological resources within the City's portion of the IOF as part of ongoing maintenance and use, with a long-term vision for decommissioning and a change in use. As part of the Draft IOF Specific Plan, biological resources could be protected under a Special Status Species and Habitat Protection Plan, project-specific surveys, compliance with USFWS and CDFW requirements, monitoring of nesting birds or sensitive species, avoidance of trees during nesting season, and habitat restoration after completion of drilling activities. As further detailed in Section 4.8, *Hazards and Hazardous Materials*, in the summer of 2018, the City Council held a special community meeting to receive an update and review the status of the Specific Plan and related Environmental Impact Report.

After receiving public comment and discussing the status, the City Council directed that the Specific Plan be placed on hold. City Council requested staff to identify qualified expert(s) and obtain a proposal to prepare an informational study that could outline options for addressing the potential amortization of oil-related activities and end-of-field life considerations for IOF, which would provide further protection and enhancement of biological resources.

In October 2021, the City adopted an Oil Termination Ordinance intended to implement an amortization program that would terminate and phase out nonconforming oil and gas activities within the City's portion of the IOF. The Oil Termination Ordinance prohibited any new or expanded oil and gas activity such as drilling of new wells, re-drilling or deepening of existing wells, or erection of any structure or facilities related to oil and gas production, with some specific exceptions, as of November 24, 2021. All previously established nonconforming oil uses must be terminated and fully removed within a phase-out time period. On November 14, 2022, the City Council approved a settlement framework with the operator of the Culver City portion of the IOF that requires the operator to plug and abandon all wells and complete the overall closure of the City's portion of the IOF by December 31, 2029, with the potential for an extension to December 21, 2032 under special circumstances.

The adopted Oil Termination Ordinance (Zoning code amendment P2021-0036-ZCA) included a requirement for "the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations." The remediation of the oil field and change in land use from oil operations to open space could directly or indirectly impact special-status species and native habitats. For example, the disturbance or removal of suitable habitat for special-status birds, bats, and small mammals could result in injury or mortality of individuals as well as temporary habitat loss. However, in the long-term, revegetation of remediated areas with native vegetation would provide more habitat for both common and special-status plants and wildlife.

Although compliance with the proposed goals and policies of the General Plan 2045 and the applicable laws and regulations would help to minimize impacts to special-status species, MM BIO-1 and MM BIO-2 are recommended to ensure that impacts to special-status species from implementation of the General Plan 2045 would be reduced to a less than significant level. These mitigation measures require development under the General Plan 2045 to implement procedures and processes related to protecting special-status species, such as preconstruction surveys, compensatory mitigation for loss of designated habitats, and protection and/or avoidance of special-status species. Implementation of the mitigation measures would ensure that construction impacts to special-status species with implementation of the General Plan 2045 would be less than significant.

Operations

Special-Status Plants

Operation of some of the future land uses under the General Plan 2045 would likely include routine landscaping and maintenance, which could have the potential to adversely impact

special-status plants where such land uses are proximate to suitable habitat. Potential adverse impacts may result from introducing non-native or invasive species into habitat areas that support special-status plant species and could result in invasive species outcompeting the special-status native species for water, nutrients, and sunlight. The Oil Termination Ordinance is intended to terminate nonconforming oil and gas uses within the City's portion of the IOF. Proposed General Plan policies C-2.1, C-2.2, C-2.6, C-2.7, and C-2.9 include habitat improvement and expansion, preservation, protection, and improvement of open space, requirements to plant native species near natural open areas, greater building setbacks to support habitat. Implementation of these policies would minimize potential impacts of operation of the General Plan 2045 on special-status plants. Finally, future development would be required to incorporate MM BIO-1 which requires applicants to address operational impacts to special-status plants and identify avoidance and minimization measures to offset potential impacts. With compliance with the proposed General Plan 2045 goals and policies and incorporation of the mitigation measures, impacts to special-status plants during operation would be reduced to a less than significant level.

Special-Status Wildlife and Nesting Birds

Operation of the future land uses under the General Plan 2045 could result in adverse impacts to special-status wildlife and nesting birds due to the removal and/or change in existing habitats, increased vehicular traffic and a corresponding increase in noise and threat of road kill by traffic; an increase in human presence in preserved or open space areas; an increase in predatory and feral pets; an increase in litter, pollutants, dust, oil, and other human debris; and an increase in nighttime light trespass onto preserved open space. The General Plan 2045 goals and policies listed below aim to improve the conditions of the existing natural habitat and the associated species that utilize those habitats. In addition, City Ordinance No. 2021-016 is intended to terminate nonconforming oil and gas uses within the City over a five-year period. Finally, to ensure that operational impacts associated with the future land uses are reduced to a less than significant level, future development would be required to incorporate and implement MM BIO-1.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including uses, densities and intensities, setbacks, and heights. Therefore, the Zoning Code Update would not adversely impact special-status species.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-2: Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

C-2.1: Habitat improvement and expansion. Improve on existing limited habitats and create new habitats to prevent displacing or endangering species in the future.

C-2.2: Open space areas preservation, protection, and improvement. Preserve, protect, and improve open space areas to promote biological resource values.

C-2.3: Vegetation at parks and open spaces. Manage vegetation at parks and open spaces in Culver City to support biodiversity by reducing pesticide use and reducing use of non-native species.

C-2.4: Tree planting. Plant and maintain trees to sequester carbon, reduce urban heat, provide habitat, and contribute to the city's character.

C-2.5: Native species. Plant native species that provide valuable resources for native wildlife and increase habitat resiliency.

C-2.6: Native vegetation in open space areas. Use native vegetation and maintain standards and guidelines to protect plant and wildlife species from new development near Kenneth Hahn State Recreational Area, the IOF, Baldwin Hills, and other remaining open space areas.

C-2.7: Building setbacks. Encourage greater building setbacks for new development to support habitat areas and adaptation.

C-2.8: Lighting near open spaces. Require that development near natural open space areas include low-intensity lighting to reduce the amount of light that reaches sensitive habitat.

C-2.9: Native spaces requirements near open spaces. Require developments near natural open space areas to plant native species and species that provide resources for native wildlife within landscape areas.

Goal C-3: Wildlife and plant species. Threatened and endangered wildlife and plant species are protected within the city.

C-3.1: Coordination with agencies and jurisdictions to manage wildlife. Coordinate with resource agencies and neighboring jurisdictions to manage threatened and endangered wildlife and plant species and to coordinate on decisions, information, and research related to managing threatened and endangered wildlife.

C-3.2: Resource management agency consultation. Consult with CDFW, RWQCB, USFWS, National Audubon Society, California Native Plant Society, and other resource management agencies, as necessary, during discretionary application reviews to avoid or minimize impacts to biological resources.

C-3.3: Special status species. As appropriate, require that projects subject to discretionary review survey and identify special status species that could be negatively affected during project implementation. If special status species are identified, comply with USFWS and CDFW requirements for special status species.

C-3.4: Wildlife education. Continue to educate residents about wild animals, especially in wildlife interface areas, in order to minimize human-wildlife conflicts.

Mitigation Measures

The Project could result in potentially significant impacts to special-status species and/or their habitats during construction and operation of projects developed under the General Plan 2045.

However, implementation of MM BIO-1 and MM BIO-2, which would apply to future development, would reduce impacts to a less than significant level.

MM BIO-1 Baseline Biological Assessment: The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:

- a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, § 15125(c)].
- b. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018);
- c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d. A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, § 15380); and,
- e. Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance.
- f. Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.
- g. Avoidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented.

MM BIO-2 Nesting Bird Surveys: Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Level of Significance After Mitigation

With implementation of MM BIO-1 and MM BIO-2, potential significant impacts related to special-status species and their habitats, would be reduced to a less-than-significant level.

Adversely Affect Riparian Habitat or Sensitive Natural Habitat

Threshold BIO-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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 CDFW or USFWS.

Impact Statement BIO-2: The Project would have no adverse effect on any riparian habitat or sensitive natural community due to the lack of any such habitat within the Planning Area.

Given the lack of any sensitive natural communities, including lack of riparian habitat, within the Planning Area, the Project would have no effect on these resources. Therefore, the Project would not result in 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 CDFW or USFWS. The General Plan 2045 and Zoning Code Update would have no impact.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would have no impact with regard to 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 CDFW or USFWS.

Adversely Affect State or Federally Protected Wetlands

Threshold BIO-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Statement BIO-3: The Project would not have a substantial adverse effect on state or federally protected wetlands or waters. Project impacts would be less than significant.

Based on the habitats present within the Planning Area and review of the National Wetlands Inventory, there are no wetlands present within the Planning Area. Therefore, the General Plan 2045 and Zoning Code Update would have no effect on these resources.

The planned Ballona Creek Revitalization Project would enhance the restoration and use of Ballona Creek. The City and community have been identifying opportunities to revitalize the creek over the past 15 years, which include improving access and recreational opportunities along the creek and measures to improve the ecology and water quality of the creek. The City has explored options to restore and enhance the creek to improve biological diversity, including the possible restoration of the concrete-channelized portion of Ballona Creek; however, there are engineering constraints related to managing flood events. Also, the enhancement of Ballona Creek may include its possible designation as a City park. Proposed upgrades may include a northern extension of the existing bike path, security lighting, bike path upgrades, benches, picnic tables, potable water sources, etc. Restoration/enhancement activities and/or the proposed upgrades to recreational facilities along Ballona Creek could result in the removal or disturbance of the concrete-lined channel or the channel banks. These activities may require Clean Water Act permits from the USACE and RWQCB and/or a streambed alteration agreement from CDFW, which would be obtained from the City prior to any work, and permit conditions would be implemented. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-6: Ballona Creek. Ballona Creek is transformed such that it mitigates flooding, restores native ecologies, and becomes a scenic multi-purpose open space and recreational corridor.

C-6.5: Lighting along Ballona Creek. Incorporate shielded or directed low level lights along the Ballona Creek path to promote safety and security while avoiding light spill and glare onto residential properties and habitats adjacent to the creek.

C-6.8: Trees and landscaping along Ballona Creek. Expand tree planting along Ballona Creek to sequester carbon, adapt to climate change, and provide habitat for wildlife. Encourage concentrated planting of trees and landscaping along areas of the creek corridor that will upgrade visual quality from prominent vantage points along public streets, and from parks and other public gathering areas.

C-6.9: Engagement related to planting along Ballona Creek. Conduct outreach with residential and other property owners along the Ballona Creek corridor to promote use of native plant materials and a plant palette for creek-adjacent properties.

C-6.10: Sustainable planting along Ballona Creek. Establish Ballona Creek as a sustainable scenic recreational and open space corridor by planting native trees and other compatible landscaping.

C-6.11: Restore Ballona Creek. Coordinate with public and private organizations to support a cohesive approach for planning, implementing, and funding Ballona Creek restoration related to recreational use and trail systems, improved water quality, and increased landscaped open space, while maintaining the priority for flood control.

C-6.13: Engaging non-profit organizations to advance common goals along Ballona Creek. Coordinate with nonprofits and other entities to help implement, fund, maintain, and realize common goals to restore Ballona Creek. Consider the Baldwin Hills Conservancy, California Coastal Conservancy, Ballona Creek Renaissance, The Bay Foundation, Heal the Bay, Friends of Ballona Wetlands, Ballona Wetlands Land Trust, Santa Monica Bay Restoration Commission, Mountains Recreation & Conservation Authority, LA Waterkeeper, Ballona Wetlands Foundation, Southern California Association of Governments (SCAG), U.S. Army Corps of Engineers, Santa Monica Bay Restoration Project, Los Angeles RWQCB, and involved City and County of Los Angeles departments.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would have a less-than-significant impact on wetlands or other waters.

Interfere with Wildlife Corridors or Wildlife Nursery Sites

Threshold BIO-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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 wildlife nursery sites.

Impact Statement BIO-4: The Project would not substantially interfere with movement of native resident or migratory fish or wildlife species or with established wildlife corridors due to the lack of wildlife movement corridors within the Planning Area. In addition, the Project would not impede the use of wildlife nursery sites with implementation of Mitigation Measure MM BIO-2 for migratory birds. Therefore, Project impacts would be less than significant with mitigation incorporated.

General Plan 2045

Wildlife Corridors

Based on a review of available data sources described in the Environmental Setting section and Subsection 4.3.4.1 Methodology above, no wildlife corridors are present within the Planning

Area. Given the lack of any wildlife corridors within the Planning Area, the Project would have no effect on these resources.

Nesting Birds and Wildlife Nursery Sites

As described above, nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where implementation of the General Plan 2045 could directly or indirectly impact these biological resources. The Planning Area includes several areas that consist of trees, shrubs, and ground cover, including non-native/ornamental vegetation dispersed throughout developed land uses that could be used by breeding raptors and songbirds. Disturbing or destroying active nests is a violation of the MBTA and nests and eggs are protected by Fish and Game Code, Section 3503. While these biological resources have a low potential to occur due to the heavily developed nature of the Planning Area, future development could impact these resources if removal of active nests or harassment of a breeding bird occur during construction, resulting in a potentially significant impact.

Construction of development facilitated under the General Plan 2045 and Zoning Code Update would be required to comply with the proposed Goals and Implementing Policies listed below as well as applicable development standards. Compliance with the City's Urban Forest Plan and Goals C-2.4, C-6.8, C-6.10, and C-6.11 would aim to enhance and expand the City's urban forest canopy, which in turn would increase available nesting bird habitat throughout the Planning Area. In addition to the proposed 2045 General Plan goals and policies listed below, future applicants would also be required to comply with the MBTA, which would further reduce impacts to nesting birds.

Although compliance with the General Plan 2045 goals and policies, the Zoning Code Update and the MBTA would help to minimize impacts to nesting birds and their associated habitat, MM BIO-2 would ensure that impacts to nesting birds would be reduced to a less than significant level on a project-by-project basis. MM BIO-2 would require development under the General Plan 2045 to implement procedures and processes related to protecting nesting birds and their associated habitat, such as pre-construction surveys and protection and/or avoidance of nesting birds and their associated habitats. Implementation of this mitigation measure would ensure that impacts to nesting birds during construction of future development under the General Plan 2045 and Zoning Code Update would be less than significant.

Based on review of available information cited above, no known non-avian Wildlife Nursery Sites occur within the Planning Area.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-2: Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

C-2.4: Tree planting. Plant and maintain trees to sequester carbon, reduce urban heat, provide habitat, and contribute to the city's character.

Goal C-6: Ballona Creek. Ballona Creek is transformed such that it mitigates flooding, restores native ecologies, and becomes a scenic multi-purpose open space and recreational corridor.

C-6.8: Trees and landscaping along Ballona Creek. Expand tree planting along Ballona Creek to sequester carbon, adapt to climate change, and provide habitat for wildlife. Encourage concentrated planting of trees and landscaping along areas of the creek corridor that will upgrade visual quality from prominent vantage points along public streets, and from parks and other public gathering areas.

C-6.10: Sustainable planting along Ballona Creek. Establish Ballona Creek as a sustainable scenic recreational and open space corridor by planting native trees and other compatible landscaping.

C-6.11: Restore Ballona Creek. Coordinate with public and private organizations to support a cohesive approach for planning, implementing, and funding Ballona Creek restoration related to recreational use and trail systems, improved water quality, and increased landscaped open space, while maintaining the priority for flood control.

Mitigation Measures

MM BIO-2, provided above, is required.

Level of Significance After Mitigation

The Project impact would result in less than significant impacts with implementation of MM BIO-2 related to wildlife movement.

Conflict with Tree Preservation Policy or Ordinance

Threshold BIO-5: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Statement BIO-5: The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, within the Planning Area. Therefore, impacts would be less than significant.

Implementation of the General Plan 2045 and Zoning Code Update would not introduce any potential conflicts with the existing Culver City Tree Removal Ordinance No. 2013-007 (Tree Removal), Los Angeles County Oak Tree Protection Ordinance, or the Los Angeles County Oak Woodlands Conservation Management Plan, which applies to the city's SOI. Future development facilitated under the General Plan 2045 would be subject to the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. In addition, proposed General Plan 2045 policies help promote a strong urban forest across public and private properties (Goal C-2 and policy C-2.4) and enhance tree health and appearance of streets and other public spaces through the regular maintenance as well as tree and landscaping planting and care of the existing canopy. Consistency with these policies would further ensure impacts of the General Plan 2045 to existing and proposed tree resources would be minimized. Therefore,

the impact related to conflicts with local policies or ordinances protecting biological resources would not occur and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-2: Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

C-2.4: Tree planting. Plant and maintain trees to sequester carbon, reduce urban heat, provide habitat, and contribute to the city's character.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would not conflict with local policies or ordinances protecting biological resources and impacts would be less than significant.

4.3.5 Cumulative Impacts Analysis

The geographic context for the cumulative analysis for biological resources includes the neighboring cities and unincorporated County lands located within the Westside region of Los Angeles County. Future development in this cumulative study area, including growth anticipated under the General Plan 2045, would contribute incrementally to the continuing reduction in relatively natural, undisturbed open space areas, contribute to the progressive fragmentation of habitat areas, and decline in species diversity throughout the region, thus resulting in a potentially significant cumulative impact to biological resources.

Since there are limited biological resources and habitats within the Planning Area due to its largely developed nature, implementation of the General Plan 2045 would not significantly impact biological resources within the Planning Area. Additionally, the General Plan 2045 includes policies that aim to protect and enhance the biological resources within the Planning Area. Implementation of these policies would not conflict with local policies or ordinances protecting biological resources, and implementation of MM BIO-1 and MM BIO-2 would ensure that the potential impacts to special-status biological resources, including protected habitats, would be reduced to a less than significant level. For these reasons, the Project's contribution to this potentially significant cumulative impact would not be cumulatively considerable. Therefore, the Project would result in less than significant cumulative impacts related to biological resources.

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4.4 Cultural Resources

4.4.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on cultural resources from future development allowed under the Project, including potential impacts related to historical resources and archaeological resources. The section provides context regarding the Planning Area's prehistoric, ethnographic, and historic settings and existing resources, as well as relevant federal, state, and local regulations and programs.

4.4.2 Environmental Setting

Prehistoric Setting

Based on recent research in the region,¹ the following prehistoric chronology has been divided into four general periods: the Paleocoastal (12,000 to 8,000 Before Present² [BP]), Millingstone (8,000 to 3,000 BP), Intermediate (3,000 to 1,000 BP), and Late (1,000 BP to Anno Domino [AD] 1542) Periods. This chronology is manifested in the archaeological record by artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

Paleocoastal Period (12,000–8,000 BP)

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 BP has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 BP. During this period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.³

Millingstone Period (8,000–3,000 BP)

During this period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy that is broadly focused on obtaining a wide variety of goods and resources. The first evidence of human occupation in the Los Angeles area dates to at least 9,000 years BP and is associated with the Millingstone cultures.^{4,5} Millingstone cultures were

¹ Homburg, Jeffrey A., Diane L. Doublas, Eric C. Brevik, Caroline Tepley, and Antony Orme. 2014. Paleoenvironmental Reconstruction of the Ballona Lagoon. In *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California. Volume 1: Paleoenvironment and Culture History*, edited by J. Homburg, J. Douglass, and S. Reddy, pp. 85–110. Statistical Research, Inc., Tucson, Arizona.

² Before Present (or BP) is a time scale used by archaeologists and geologists that represents the number of years before the present.

³ Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

⁴ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

⁵ Warren, C. N. 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1–14.

characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.^{6,7} Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 BP contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Intermediate Period (3,000–1,000 BP)

During this time period, many aspects of Millingstone culture persisted, but several socioeconomic changes occurred.^{8,9,10} The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.¹¹ Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.¹² This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and non-utilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. The use of the bow and arrow spread to the coast around 1,500 BP, largely replacing the dart and atlatl.¹³ Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 BP.¹⁴

⁶ Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

⁷ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

⁸ Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

⁹ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

¹⁰ Warren, C. N. 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1–14.

¹¹ Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

¹² Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215–227.

¹³ Homburg, Jeffrey A., Diane L. Doublas, Eric C. Brevik, Caroline Tepley, and Antony Orme. 2014. Paleoenvironmental Reconstruction of the Ballona Lagoon. In *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California. Volume I: Paleoenvironment and Culture History*, edited by J. Homburg, J. Douglass, and S. Reddy, pp. 85–110. Statistical Research, Inc., Tucson, Arizona.

¹⁴ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3–27.

Late Period (1,000 BP–AD 1542)

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period.¹⁵ The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.¹⁶ This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.^{17,18} Settlement at this time is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.¹⁹

Ethnographic Setting – Indigenous Peoples

The Planning Area is in a region traditionally occupied by Indigenous Peoples. Groups of Indigenous Peoples of Los Angeles include Gabrieleño, Gabrielino, Tongva, and Kizh. "Gabrielino" and "Gabrieleño" are Spanish names deriving from the San Gabriel Mission. "Tongva" was likely a Native village in the same vicinity. The name the Indigenous Peoples may have originally called themselves is "Kizh," meaning home.²⁰ However, there is pan-tribal name for LA's Indigenous Peoples that predates the arrival of Europeans.²¹ For this report, the term "Gabrielino" will be used, in keeping with the State-recognized name of San Gabriel Band of Mission Indians.

Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.²² The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

At the time of Spanish contact, many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.²³ This religion may have been relatively new when the Spanish arrived, and was spreading at that time to other neighboring Takic groups. The

¹⁵ The pre-contact period is the time before contact with Europeans, which began around 12,000 years ago and ended prior to AD 1542.

¹⁶ Kroeber, A. L. 1925. *Handbook of the Indians of California*. Dover Publications, Inc., New York, reprinted 1976.

¹⁷ Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

¹⁸ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3–27.

¹⁹ Koerper, H.C., R.D. Mason, and M.L. Peterson. 2002. Complexity, Demography, and Change in Late Holocene Orange County. In *Catalysts to Complexity: Late Holocene Societies of the California Coast*, edited by J.M.

²⁰ Stickel, Gary E., PhD. 2016. Why the Original Indian Tribe of the Greater Los Angeles Area is Called Kizh not Tongva. Available at: https://www.cpp.edu/~tgyoung/Pom_Parks/Kizh%20not%20Tongva_9-27-17.pdf.

²¹ Los Angeles Almanac. January 2, 2019. Original Settlers of Los Angeles. Available at: <http://www.laalmanac.com/history/hi03c.php>.

²² Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²³ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Gabrielino practiced both cremation and inhumation²⁴ of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.²⁵ Native Americans suffered severe depopulation, and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

A Gabrielino village, or “rancheria,” known as Guaspeta, Guasna, Guashna, Guachpet, Guashpet, and Guaspita, appears to have been located southwest of the city. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820.^{26,27} At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the vicinity of the Planning Area, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.²⁸ Two archaeological sites with components dating to the Spanish era (CA-LAN-62 and -211), located within about 2.0 miles from the city, may be the location of Guaspeta, although this has not been confirmed in the historical record.²⁹

Historic Setting

Spanish Period (AD 1542–1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.³⁰ Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.³¹

²⁴ Inhumation is the action of burying the corpse of the dead (as opposed to cremating the remains).

²⁵ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁶ Reedy, Seetha N. 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. *Journal of Anthropological Archaeology*, No. 37, pg. 48–66.

²⁷ McCawley, William, 1996. *The First Angelinos, The Gabrielino Indians of Los Angeles. Malki Museum Press, Morongo Indian Reservation.*

²⁸ Stoll, Anne Q., John G. Douglass, and Richard Ciolek-Torrello. 2009. Searching for Guaspeta: A Mission Period Rancheria in West Los Angeles. *SCA Proceedings*, Vol. 22.

²⁹ Reedy, Seetha N. 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. *Journal of Anthropological Archaeology*, No. 37, pp. 48–66.

³⁰ McCawley, William, 1996. *The First Angelinos, The Gabrielino Indians of Los Angeles. Malki Museum Press, Morongo Indian Reservation.*

³¹ Johnson, J. R., and D. D. Earle. 1990. Tataviam Geography and Ethnohistory. *Journal of California and Great Basin Anthropology*, Vol. 12, No. 2, pp. 191–214.

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples. Mission San Gabriel Arcángel was founded on September 8, 1771, and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing.³² This lifestyle change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

On September 4, 1781, El Pueblo de la Reina de los Angeles was established (approximately 5.5 miles northeast of the Planning Area) not far from the site where Portolá and his men camped during their 1769 excursion, with a land grant of 28 acres issued to California Governor Felipe de Neve in 1781.³³ The pueblo was first established in response to the increasing agricultural needs of Spanish missions and presidios in Alta California.³⁴ The original pueblo consisted of a central square surrounded by 12 houses and a series of agricultural fields. Thirty-six fields occupied 250 acres between the town and the river to the east.³⁵

By 1786, the flourishing pueblo attained self-sufficiency, and funding by the Spanish government ceased. Fed by a steady supply of water and an expanding irrigation system, agriculture and ranching grew, and by the early 1800s the pueblo produced surplus wheat, corn, barley, and beans for export. A large number of livestock, including cattle and sheep, grazed in the surrounding lands.³⁶

Mexican Period (AD 1821–1848)

Mexico gained its independence from Spain in 1821.³⁷ Mexico promoted the settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the missions, reclaiming most mission lands, and redistributing them as land grants. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.³⁸

³² Jackson, Robert H., Agriculture. 1999. Drought & Chumash Congregation in the California Missions (1782–1834), Articles, California Mission Studies Association Newsletter, 1999.

³³ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³⁴ Alta California encompasses the former Spanish possessions along the Pacific coast and north of the peninsula of Baja California. Originally, early maps of the area showed California as an island. Later, when this mistake was corrected in the 18th century, the peninsula came to be called Baja California and the rest of the mainland, Alta California.

³⁵ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³⁶ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³⁷ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³⁸ Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz. 2009. *Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

Many ranchos continued to be used for cattle grazing by settlers during the Mexican Period. Hides and tallow from cattle became a major export for Californios,³⁹ many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros⁴⁰ and Indian laborers.^{41,42}

American Period (AD 1848–Present)

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.⁴³

When the discovery of gold in northern California was announced in 1848, a huge influx of people from other parts of North America flooded into California, and the population of Los Angeles tripled between 1850 and 1860. The increased population provided an additional outlet for the Californios' cattle. As demand increased, the price of beef skyrocketed, and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.^{44,45} These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.^{46,47}

Los Angeles was connected to the transcontinental railroad via San Francisco on September 5, 1876, and the population again exploded. The city would experience its greatest growth in the 1880s when two more direct rail connections to the East Coast were constructed. The Southern Pacific completed its second transcontinental railway, the Sunset Route from Los Angeles to New Orleans, in 1883.⁴⁸ In 1885, the Santa Fe Railroad completed a competing transcontinental railway to San Diego, with connecting service to Los Angeles.⁴⁹ The resulting fare wars led to an unprecedented real estate boom. Despite a subsequent collapse of the real estate market, the population of Los Angeles increased 350 percent from 1880 to 1890.⁵⁰ Los Angeles continued its

³⁹ Spanish speaking, Catholic persons of Latin American descent born in Alta California between 1769 and 1848.

⁴⁰ Horsemen and cattle herders of Spanish Mexico and Alta California.

⁴¹ Pitt, Leonard. 1994. *The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890*. University of California Press, Berkeley.

⁴² Starr, Kevin. 2007. *California: A History*. Modern Library, New York.

⁴³ Starr, Kevin. 2007. *California: A History*. Modern Library, New York.

⁴⁴ McWilliams, Carey. 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

⁴⁵ Dinkelspiel, Frances. 2008. *Towers of Gold*, St. Martin's Press, New York.

⁴⁶ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

⁴⁷ McWilliams, Carey. 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

⁴⁸ Orsi, Richard J. 2005. *Sunset Limited – the Southern Pacific Railroad and the Development of the American West, 1850 - 1930*. University of California Press, Berkeley and Los Angeles, California.

⁴⁹ Mullaly, Larry and Bruce Petty. 2002. *The Southern Pacific Railroad in Los Angeles, 1873 - 1996*. Golden West Books, San Marino, California.

⁵⁰ Dinkelspiel, Frances. 2008. *Towers of Gold*, St. Martin's Press, New York.

upward trajectory in the first few decades of the 20th century with the rise of tourism, automobile travel, and the movie industry.⁵¹

Early Settlers and La Ballona Valley

Early families that settled in La Ballona Valley came on different expeditions. Francisco Salvador Lugo, for example, came on Rivera's 1774 trip from Sinaloa, Mexico, and was one of the soldiers present at the founding of the pueblo of Los Angeles in 1781. José Manuel Machado and his wife, Maria, traveled from Sinaloa, Mexico on the Rivera expedition of 1781. Machado continued to serve as a soldier in different locations until he retired to the pueblo of Los Angeles in 1797. Jose Machado's death in 1810 forced the sons to provide for the family's future. Agustín and his brother Ygnacio Machado, after unsuccessful attempts to acquire land near the pueblo, decided to settle in La Ballona Valley and raise cattle on Rancho La Ballona which they established in 1819 with two partners, Felipe Talamantes and his son Tomás.

In 1839, the Machados began to work towards legal ownership of La Ballona. Governor Alvarado granted legal title on the condition that a house was built on the land and was occupied by the grantee and that a survey was done.⁵² After Agustín Machado's death in 1865, Rancho La Ballona was divided into long strips of land due to the variation in soil type and quality, and to ensure that all new owners had some land that was fertile and irrigable with water from Ballona Creek.⁵³

Another rancho, Rancho Rincón de los Bueyes, was originally the property of Bernardo Higuera and Cornelio Lopez, and about a third the size of La Ballona. The area occupied by Rincón de los Bueyes, from Ince Boulevard east, included the natural corner created by the Baldwin Hills. The full name of the grant, however, was Corral Viejo del Rincón, and indeed, the corner was used to corral and protect the livestock. Eventually, Bernardo Higuera verbally gave this land to his brothers Policarpio and Mariano Higuera, son Francisco Higuera and Pedro Mendez. That land extended from Ince Boulevard east to La Cienega, north to Airdrome, and south to the Baldwin Hills.⁵⁴

Culver City was formed from portions of the 14,000-acre Rancho La Ballona (Machado/Talamantes property) and Rincón de Los Bueyes (Higuera/Lopez property). Rancho La Ballona stretched to Pico Boulevard (abutting Rancho San Vicente y Santa Monica) and to what we know as Ince Boulevard, where Rancho Rincón de los Bueyes began.

Harry Culver and Culver City

Harry H. Culver (1880 - 1946), the founder of Culver City, was born in Milford, Nebraska on January 22, 1880.⁵⁵ The middle child of five, Culver was raised on a farm along with three

⁵¹ McWilliams, Carey. 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

⁵² Cerra, Julie Lugo. 1992. *Culver City: The Heart of Screenland*. Windsor Publications.

⁵³ Pennington, L. W. and Baxter, W. K. 1976. *A Past to Remember: The History of Culver City*.

⁵⁴ Culver City. 2020. History of Culver City – Rancho Rincon de los Bueyes (Higuera) website. Accessed September 1, 2020 at: <https://www.culvercity.org/how-do-i/learn/about-culver-city/history-of-culver-city/early-settlers-of-culver-city/rancho-rincon-de-los-bueyes-higuera>.

⁵⁵ Cerra, Julie Lugo. 2013. *Culver City Chronicles*, Charleston, History Press, p. 35.

brothers and a sister. His father, Jacob Hazel Culver, was a brigadier general in the National Guard and a strict disciplinarian. Culver followed in his father's footsteps, enlisting in the military during the Spanish-American War. He studied at Doane College before spending three years at the University of Nebraska. In 1901, Culver traveled to the Philippines, where he began working in the mercantile business, worked as a reporter for the *Manila Times*, and served as a special agent for the Customs Department. After more than three years in the Philippines, Culver returned to the United States, performing his customs duties in Detroit and Saint Louis. He resigned from the Customs Department in 1910 when he moved to California and began working for real estate giant I.N. Van Nuys. "As the story goes, after Van Nuys offered to make him a manager because of his exemplary work, Culver decided to venture out on his own. After intense study, Harry Culver pinpointed the area between Los Angeles and Abbot Kinney's resort of Venice for his city."⁵⁶

At the California Club in 1913, Harry Culver announced his plans to develop a city west of downtown Los Angeles. Culver saw an opportunity to capitalize on the excitement generated by Abbot Kinney's Venice of America development along the California coast south of Santa Monica. Between Venice and Los Angeles sat open land, originally part of Rancho La Ballona and Rancho Rincón de los Bueyes, and as the relationship between Los Angeles and Venice took shape, Culver saw a spot in between that was ideal for a new town site. "If you draw a line from the Story Building to the Ocean Front at Venice, at the halfway mark you will find three intersecting electric lines—the logical center for what we propose to develop a townsite."⁵⁷ Soon after Culver's speech, Culver City was established. Culver promoted his new community by holding special events like "prettiest baby contests" and an annual marathon race. Newspaper advertisements exclaimed, "All Roads Lead to Culver City!" Culver City continued to grow and incorporated in 1917.

Cultural Resource Types

Cultural resources can include prehistoric and historic period archaeological sites, structures, districts, and landscapes, or any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious or any other reason. For purposes of this Section, cultural resources have been categorized into two types: archaeological resources and historic resources. These resource types are further defined in the discussion below.

In general, cultural resources are evaluated for significance by determining whether they are listed in or are eligible for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (California Register), or as part of a local register. The City of Culver City's Historical Preservation Ordinance, enacted in 1991, is administered through the City's Administrative Services Department, Cultural Affairs Division. The Ordinance outlines a designation process and criteria, as well as procedures for altering or modifying designated cultural resources.

⁵⁶ Cerra, Julie Lugo. 2013. *Culver City Chronicles*, Charleston, History Press, p. 35.

⁵⁷ Cerra, Julie Lugo. 2013. *Culver City Chronicles*, Charleston, History Press, p. 35.

Archaeological Resources

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Over time, this material evidence becomes buried, fragmented or scattered or otherwise hidden from view. It is not always evident from a field survey if archaeological resources exist within a given Planning Area. Thus, the possible presence of archaeological materials must often be determined based upon secondary indicators, including the presence of geographic, vegetative, and rock features which are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the surrounding area. In urban areas such as the Planning Area and its environs, archaeological resources may include both prehistoric remains and remains dating to the historic period.

- Prehistoric (or Native American) archaeological resources are physical remains resulting from human activities that predate written records and are generally identified as isolated finds or sites. Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and burials/human remains.
- Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and graves, and are generally associated in California with the Spanish Mission Period (AD 1769) to the mid-20th century of the American Period (AD 1848–1970).

Existing Known Archaeological Resources

Results of the archival research indicate that 18 archaeological resources have been previously identified within the city. Of the 18 archaeological resources, six are historic period archaeological resources, 11 are prehistoric archaeological resources, and one is a multicomponent resource. All but three resources have been evaluated for potential eligibility on the federal, state, and/or local level (**Table 4.4-1**).

Historic Resources

Historic resources include standing structures, buildings, districts, roads, bridges, other infrastructure, objects, and landscapes of historic or aesthetic significance that are generally 45 or 50 years of age or older. Historic resources typically date to the historical period (i.e., AD 1769–1970) and include resources that are evaluated for significance for their architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Existing Known Historic Resources

Results of the archival research indicate that 204 historic resources have been previously identified from a variety of sources within the Planning Area. One of these sources is the Culver City Historic Preservation Advisory Committee Report ("HPAC Report") which, in 1990, ranked over 100 structures (including film studio, commercial and residential properties) for designation as Cultural Resources at either "Landmark," "Significant," or "Recognized" levels. With adjustments in certain designation levels, the City adopted these by Resolution on April 22, 1991. Culver City also has three designated historic districts: 11027–11047 Braddock Drive, 4052–4070 Lafayette Place, and 4128–4181 McConnell Boulevard. Three of Culver City's "Landmark" structures are also

**TABLE 4.4-1
 PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN THE CITY**

P-Number (P-19-)	Permanent Trinomial (CA-LAN-)	Description	Date Recorded	Eligibility
000053	000053	Prehistoric archaeological site described as a village or campsite on the bank of La Ballona Creek. Among the artifacts found at the site consist of a double basin metate, a slab metate, metate fragments, a mortar fragment, a discoidal stone, shell fragments, manos, projectile points, and a stone disc	1950	Unknown
000055	000055	Prehistoric archaeological site described as a camp site near Ballona Creek with shell fragments, projectile points, a bone awl, a metate, and some skeletal material	1950	Unknown
000056	000056	Prehistoric archaeological site described as a camp site near Ballona Creek. A mano, scraper, and a thin smoothed oval pebble are among the items found at the site	1950 2013	Unknown
000057	000057	Prehistoric archaeological site described as a village or camp site on the south bank of La Ballona Creek. Shell fragments, projectile points, and large bowls were found at the site	1939 1950	Unknown
000058	000058	Prehistoric archaeological site described as a village or camp site on the north bank of La Ballona Creek. Mortars, complete and broken pestles, metates, manos, a blade, and cog stones were found at the site	1950	Unknown
000067	000067	Prehistoric archaeological site described as a temporary dwelling and located on a small wash. A small amount of shell was found at this site	1950	Unknown
000068	000068	Prehistoric archaeological site described as a seasonal village on the west bank of La Ballona Creek. Among the items found at the site consist of manos, mano fragments, metate fragments, a knife, bone fragments, a "rock chip", a chert rock, and a piece of gray-green stone	1950	Unknown
002966	002966	Prehistoric archaeological site consisting of groundstone fragments, a mano, shell fragments and fire affected rock	2000	Unknown
002967	002967H	Historic-period archaeological site consisting of a trash deposit containing pop bottles, sanitary seam cans, liquor bottles, household utility bottles, cosmetic bottles and jars	2000	Unknown
002968	002968	Prehistoric archaeological site consisting of a lithic scatter	2000	Unknown
003755	003755H	Historic-period archaeological site consisting of a moderate density trash scatter containing broken/complete glass beverage and medicine bottles, china fragments, and construction materials	2007	Unknown
004829	004829H	Historic-period archaeological site consisting of 13 features that include the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s	2017	Not Eligible for CR
100249	-	Prehistoric archaeological isolate consisting of a contracting-stemmed biface made of chalcedony	1998	Unknown
N/A*	N/A*	Two prehistoric metate artifacts recovered in upper six feet of disturbed fill materials during construction monitoring project.	2019	Not Eligible for CR
N/A*	N/A*	Three historic-period isolates consisting of glass bottle containers for liquor and soda recovered in upper 5 feet of disturbed fill materials. Recovered during construction monitoring project.	2018	Not Eligible for CR

SOURCES: SCCIC, 2019; ESA, 2022; ESA, 2021 *Resources currently do not have a formal P number or trinomial designation from the CHRIS-SCCIC

included in the NRHR. These are the Washington Building (9720–9730 Washington Blvd.), Citizen Building (9355 Culver Blvd.) and Culver Hotel (9400 Culver Blvd.).

The historic resources include a mix of residential buildings (single-family, duplex, and apartment), entertainment studios, commercial buildings (a bathhouse [this is in reference to The Plunge, a community pool], a restaurant, a theater, and hotels), a post office, churches, an airline/railroad segment, a substation, a school, a public utilities building and utilities (utility pole and cell tower), a flood control channel and historic period commercial development along Main Street.

In addition, there are a number of historic resources not included in the CHRIS-SCCIC or local City listings that have been identified through focused surveys and Historic Resources Evaluation Reports for specific plan or other private development projects. In 2014, the City Council designated the former Culver City Ice Arena, located at 4545 Sepulveda Blvd., a Cultural Resource at the "Significant" level because of its association with post-war indoor recreation that catered to youth of the baby boom generation in a developing suburban context and its association with ice skating. As for entertainment industry resources, Sony Pictures Studios and The Culver Studios both have buildings that are individually eligible at the federal, state, and/or local level. For example, individual structures were identified as eligible at The Culver Studios through a survey completed in conjunction with Comprehensive Plan Amendment Nos. 6 and 7.

Tribal Cultural Resources

The NAHC identifies and catalogs Native American cultural resources in SLFs which can include ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California. The records for these resources may not always be available at the CHRIS - SCCIC.

The NAHC SLF results were positive for the identification of a resource in their database and recommended that the city contact the Gabrielino Tongva Indians of California Tribal Council for more information.⁵⁸ See Section 4.17, Tribal Cultural Resources, for further information.

4.4.3 Regulatory Framework

This section provides the relevant federal, state, regional, and local regulations applicable to the Project.

Federal

National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to

⁵⁸ Quinn, S. 2019. Sacred Lands File Search Results and Tribal Consultation List ; Culver City GPU Project, Los Angeles County. Letter on file at the Environmental Science Associates, Irvine, CA.

indicate what properties should be considered for protection from destruction or impairment.”⁵⁹ The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.⁶⁰

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”⁶¹

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district’s significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁶²

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

⁵⁹ 36 Code of Federal Regulations (CFR) 60.

⁶⁰ United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

⁶¹ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 5.

⁶² United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.

A resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the National Historic Preservation Act.

Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.⁶³

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific property or site is understood and its meaning is made clear.”⁶⁴ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as “the ability of a property to convey its significance.”⁶⁵ The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the

⁶³ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 8.

⁶⁴ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pp. 7 and 8.

⁶⁵ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 44.

components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.⁶⁶ Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.⁶⁷ The full list of Criteria Considerations is provided below:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

Secretary of Interior's Standards for the Treatment of Historic Properties

The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10

⁶⁶ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 25.

⁶⁷ United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, p. 41.

of the Secretary's Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.⁶⁸

It is important to note that the Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

⁶⁸ United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the State and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.⁶⁹ If

⁶⁹ California Public Resources Code Section 21083.1(a).

preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.⁷⁰

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”⁷¹ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.⁷²

California Register of Historical Resources

The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”⁷³ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.⁷⁴ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California

⁷⁰ CEQA Guidelines, Section 15064.5(c)(4).

⁷¹ CEQA Guidelines, Section 15064.5(b)(1).

⁷² CEQA Guidelines, Section 15064.5(b)(3).

⁷³ California Public Resources Code, Section 5024.1[a].

⁷⁴ California Public Resources Code, Section 5024.1[b].

Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Government Code Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.” Section 6254.10 specifically exempts from disclosure requests for “records that relate to archaeological site information and reports, maintained by, or in the possession of the

Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the NAHC, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.”

Regional

Los Angeles County Historic Preservation Ordinance

The Los Angeles County Board of Supervisors adopted the County’s Historic Preservation Ordinance (HPO) on September 1, 2015. The HPO establishes criteria for designating landmarks and historic districts and provides protective measures for designated and eligible historic resources. The HPO applies to all privately owned property within the unincorporated territory of the County and all publicly owned landmarks, except properties that were not listed prior to the issuance of a demolition permit or properties affiliated with religious organizations. The HPO defines a landmark as “any property, including any structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board of Supervisors.” The HPO defines a historic district as, “A contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board of Supervisors.” Landmarks and historic districts may be designated if it is 50 years of age and meets one of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, state, county, or community in which it is located;
2. It is associated with the lives of persons who are significant in the history of the nation, state, county, or community in which it is located;
3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, state, county, or community in which it is located; or possesses artistic values of significance to the nation, state, county, or community in which it is located;
4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, state, county, or community in which it is located;
5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;
6. If it is a tree, it is one of the largest or oldest trees of the species located in the county; or
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with an historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

Historic Districts

Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria and exhibits exceptional importance.

A geographic area, including a noncontiguous grouping of related properties, may be designated as an historic district if all of the following requirements are met:

1. More than 50 percent of owners in the proposed district consent to the designation;
2. The proposed district satisfies one or more of criteria 1 through 5; and
3. The proposed district exhibits either a concentration of historic, scenic, or sites containing common character-defining features, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality; or significant geographical patterns, associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of parks or community planning.

County of Los Angeles General Plan

The Conservation and Natural Resources Element of the County’s General Plan (applicable to the SOI of the Planning Area) indicates that “Historic, cultural, and paleontological resources are an important part of Los Angeles County’s identity.” This element provides the following goal and policies for the treatment of cultural resources:

Goal C/NR 14: Protected historic, cultural, and paleontological resources.

Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.

Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.

Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Local

Culver City Historic Preservation Ordinance

The City enacted a Historic Preservation Ordinance in 1991 which defines Cultural Resources. The Historic Preservation Ordinance (Chapter 15.05 of the City’s Municipal Code [CCMC]) is administered through the City’s Community Development Department by Cultural Affairs.⁷⁵ The Ordinance outlines a designation process, criteria, and procedures for altering or modifying designated Cultural Resources. Pursuant to the City’s Ordinance, a Cultural Resource is a

⁷⁵ City of Culver City, Culver City Municipal Code, Chapter 15.05 Historic Preservation Program.

property that has aesthetic, cultural, architectural or historical significance to the city, state, or nation, and may have been designated as a Landmark Structure, Significant Structure, or Recognized Structure. After satisfying at least one of the threshold criteria, classification is based on a ranking system, currently outlined in Resolution No. 91-R015.

A **Landmark Structure** is defined as a structure designated as an exceptional example of the highest architectural, historical, or cultural significance of the community. A Landmark structure or district may be designated without owner consent.

A **Significant Structure** is defined as a structure designated as being of substantial architectural, historical, or cultural significance to the community. If residential, a “Significant” structure or district shall be designated with written consent of the owner, provided that the consent of only a majority of the owners shall be required for a “Significant District” designation. Once the designation has been made and the designation document has been filed for recondition, owner consent is irrevocable. If the owner consent is not obtained, a residential structure or district may be designated “Recognized.” If nonresidential, a structure may be designated without owner consent.

All structures with "Landmark" or "Significant" designations are required to display a plaque identifying that building or district as either "Landmark" or "Significant.”

A **Recognized Structure** is defined as a structure designated as being of architectural, historical, or cultural interest. A structure or district may be designated as “Recognized” without the consent of the owner. No other requirements apply to Recognized structures.

The Ordinance also identifies historic districts as falling into one of three different types: a “Landmark District,” a “Significant District,” or a “Recognized District,” with similar criteria for designation for each one. A historic district is described as a designated area consisting of one (1) or more contiguous parcels improved with structures at which events occurred that made a significant contribution to the city, state, or national history or culture, or an area that contains structures that are collectively significant examples of period, style, or method of construction that provide distinguishing characteristics of the architectural type or period represented.

In Section 15.02.020 of the CCMC, the Culver City Historic Preservation Ordinance establishes criteria for designating local historical resources and districts as Cultural Resources. To be considered for designation, a structure must be at least fifty (50) years old and the exterior of the structure is accessible or visible to the public, or the structure or district has special importance to the City.

- A. Threshold criteria. To be considered for designation, the structure(s) must meet one of the following criteria:
1. The structure(s) is at least fifty (50) years old and the exterior of the structure is accessible or visible to the public; or
 2. The structure or district has special importance to the City.

- B. Assessment criteria. After satisfying the threshold criteria, a structure or district shall be reviewed for compliance with one or more of the following criteria, as defined under CCMC Section 15.05.010 of this Chapter:
1. Is the structure(s) of “architectural significance”?
 2. Is the structure(s) of “historical or cultural significance”?
 3. Do the structures in the district collectively meet 1. or 2. above?

4.4.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- | | |
|-------------------------|------------------------------------------------------------------------------------------------------------|
| Threshold CUL-1: | Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. |
| Threshold CUL-2: | Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. |
| Threshold CUL-3: | Disturb any human remains, including those interred outside of formal cemeteries. |

The Initial Study (Appendix A of this Draft PEIR) found no potentially significant impacts related to disturbance of human remains (Threshold CUL-3); therefore, this issue is not evaluated in this section. Please see Appendix A for further discussion.

Methodology

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing a project’s impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment.

The following analysis of the Project’s potential to impact existing resources within the city is based on existing information derived from the following sources: (1) a cultural resources records search through the California Historic Resources Inventory System (CHRIS) - South Central Coastal Information Center (SCCIC); (2) a Sacred Lands File (SLF) search through the

California Native American Heritage Commission (NAHC); and (3) recent cultural resource discoveries encountered at construction monitoring projects within the city. In addition, the City's Cultural Affairs Division maintains information on locally identified historic resources such as Council-designated resources, historic resources identified as significant based on historic resources surveys, and resources identified as historic as part of CEQA documentation for a plan or project. Programmatic impacts are discussed in broad, qualitative terms. If necessary, a project-level CEQA analysis would be conducted for future discretionary development projects.

Projects implemented under the proposed General Plan 2045 and Zoning Code Update would be regulated by the various laws, regulations, and policies summarized in Section 4.4.3, *Regulatory Framework*. Compliance with applicable federal, state, and local laws and regulations is assumed in this analysis and local and State agencies would be expected to continue to enforce applicable requirements to the extent that they do so now.

Project Impact Analysis

Adversely Affect Significance of a Historical Resource

Threshold CUL-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.

Impact Statement CUL-1: The Project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, even with implementation of Mitigation Measure MM CUL-1, impacts would remain significant and unavoidable.

General Plan 2045

Future development facilitated under the General Plan 2045 may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features (hereafter referred to as "historic resources" or "historic properties") that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. New development and redevelopment facilitated under the General Plan 2045 could result in a substantial adverse change in the significance of a historical resource through physical demolition, destruction, relocation, or alteration of the resource. New construction through infill development on vacant property could also result in a substantial adverse change in the significance of a historical resource through alteration of the resource's immediate surroundings. The CEQA Guidelines note that generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties is considered as mitigated to a level of less-than-significant impact on the historical resource. Projects that propose alteration of a historical resource and that do not adhere to these standards have the potential to result in a substantial adverse change in the significance of a historical resource. Other projects that propose demolition or alteration of, or construction adjacent to, existing historic resources over 45 years in age (the California Office of Historic Preservation's age threshold for consideration as

historical resources), could also result in a substantial adverse change in the significance of a historical resource. Changes in the setting of historic buildings and structures can result from the introduction of new visible features, significant landscape changes, or other alterations that change the historic integrity of the setting of a significant resource.

The results of the archival research conducted for the General Plan Update Existing Conditions Background Report and summarized in Subsection 4.4.2 above, indicate that a total of 204 historic resources have been previously identified within the Planning Area. Culver City also has three designated historic districts: 11027 - 11047 Braddock Drive, 4052 - 4070 Lafayette Place, and 4128 - 4181 McConnell Boulevard. Three of Culver City's "Landmark" structures are also included in the NRHR. These are the Washington Building (9720-9730 Washington Blvd.), Citizen Building (9355 Culver Blvd.) and Culver Hotel (9400 Culver Blvd.). The historic resources include a mix of residential buildings (single-family, duplex, and apartment), entertainment studios, commercial buildings (a bathhouse [this is in reference to The Plunge, a community pool], a restaurant, a theater, and hotels), a post office, churches, an airline/railroad segment, a substation, a school, a public utilities building and utilities (utility pole and cell tower), a flood control channel and historic period commercial development along Main Street. In addition, there are a number of historic resources not included in the CHRIS System or local City listings that have been identified through focused surveys and Historic Resources Evaluation Reports for specific plan or other private development projects.

Any property that is or becomes of historic age may be a potential historical resource. A review of historic aerials indicates that there are numerous properties within the city that are more than 45 years in age. Any project that proposes the demolition, destruction, relocation, or alteration of property more than 45 years in age could result in a significant impact on historical resources.

The General Plan goal and policies listed below would help to promote the preservation of historic resources, cataloguing historic materials for public access, applying the Secretary of Interior's Standards and other regulatory codes to qualified historic properties, and expanding the City's Historic Preservation Program available on the City's website. While Policy C-1.19 would require the provision of technical information that will help property owners in planning new additions that are complimentary to the existing historic structures and conform with the Secretary of Interior's Standards, these policies do not require the identification and evaluation of historic-age properties to determine if there are historical resources within or nearby a proposed project site that could be adversely impacted by a proposed project, nor do they require the retention or rehabilitation of historical resources. Therefore, future development implemented as a result of the General Plan 2045 could result in a potentially significant impact related to historical resources during construction.

Mitigation is required to ensure that historical resources are properly identified and that impacts on any identified historical resources are reduced. However, impacts on historical resources that are demolished or substantially altered in an adverse manner such that they are no longer able to convey their historical significance and such that they are no longer eligible for inclusion in the California Register or no longer eligible for designation as Culver City Cultural

Resources at either "Landmark," "Significant," or "Recognized" levels typically cannot be mitigated to a level of less than significant.^{76,77}

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan within the city. As indicated above, future development under the Project may include demolition or alteration of historic resources. In addition, the Zoning Code Update would result in some increases in allowable building heights in limited areas throughout the city including properties over 45-years in age in the Hayden Tract along Jefferson Boulevard that would be zoned Mixed Use Industrial and Mixed Use Corridor 2 and would have allowable height limits of up to 56 feet, which is greater than current allowable heights. Also, some properties zoned Medium Density Multifamily in the Washington Culver neighborhood would have 48-foot height limits, which is greater than the current height limit in the area. However, as is currently the case, the maximum height in the Zoning Code Update would be limited to 56 feet. Exemptions to the 56-foot maximum height would still be allowed for future development that complies with the state's density bonus law as determined during the project review process or with the height exception process described in the Zoning Code. New construction under the Zoning Code Update could result in adverse indirect impacts to historical resources resulting from substantial changes in scale within the surrounding proximity of historic properties and landscapes that may cause adverse physical or visual changes to the historic setting or views of the historical resources. Thus, for historic properties over 45 years in age, future development under the Zoning Code Update would be required to comply with all applicable requirements of the Zoning Ordinance, as well as applicable mitigation measures such as MM-CUL-1, to avoid damage and promote preservation of historic resources. While potentially significant impacts to historic resources from some future development would be reduced to a less-than-significant level with mitigation incorporated, significant impacts could still occur. Therefore, even with implementation of Mitigation Measure MM CUL-1, impacts would be significant and unavoidable.

⁷⁶ CEQA Guidelines Section 15126.4(b)(2) states that in some circumstances, documentation of an historical resource, by the way of narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to the point where clearly no significant effect on the environment would occur.

⁷⁷ In *League of Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) the appellate court found that "Documentation of the historical features of the building and exhibition of a plaque do not reasonably begin to alleviate the impacts of its destruction. A large historical structure, once demolished, normally cannot be adequately replaced by reports and commemorative markers. Nor, we think, are the effects of the demolition reduced to a level of insignificance by a proposed new building with unspecified design elements which may incorporate features of the original architecture into an entirely different shopping center. This is so particularly where, as here, the plans for the substitute building remain tentative and vague. We conclude that the stated mitigation measures do not reduce the effects of the demolition to less than a level of significance."

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-1: Cultural Resources. Culver City's cultural resources are protected and enhanced through proactive measures.

C-1.1: Cultural resource catalog. Maintain a catalog of cultural resources within the City.

C-1.2: Cultural and historic resource inventory. Continue to inventory at regular intervals cultural and historical resources, including buildings, structures, districts, objects, and sites.

C-1.3: Historic resources in databases. Continue to work with Building and Planning Divisions and with the County Recorder's Office to ensure all historical resources are flagged in relevant databases.

C-1.4: Historic materials cataloging. Encourage that historic materials are cataloged and available for public access.

C-1.5: Building plaques. Continue to work with the Cultural Affairs Division to ensure plaques are positioned on newly designed cultural resources.

C-1.6: Historic sign ordinance. Continue implementation of the historic sign ordinance.

C-1.7: Cultural resources funding. Identify and acquire funding to preserve cultural resources.

C-1.8: Incentives for developers. Promote the use of incentives for developers to maintain, restore, and rebuild, or rehabilitate historic structures within commercial and residential areas.

C-1.9: Cultural resource preservation. Preserve the city's cultural resources.

C-1.10: Maintain and preserve historic structures and artifacts. Encourage maintenance and preservation of historic structures and artifacts and develop disincentives to demolish historic buildings or destroy artifacts.

C-1.11: Preservation in the planning and development review process. Coordinate with the Cultural Affairs Division to integrate preservation into the planning and development review process to ensure that cultural heritage concerns are identified at an early stage and addressed, as warranted, throughout the process. Encourage ordinances and policies that contribute to preservation goals and amended codes, where necessary, to reflect preservation goals.

C-1.12: Historic standards and building codes. Apply the Secretary of the Interior's Standards and/or the alternative building codes, such as the Uniform Code for Building Conservation (UCBC) and/or the State Historic Building Code, to qualified historic properties.

C-1.13: Demolition of historic structures. Expand existing laws and regulations as necessary to prevent demolition of historically significant structures by neglect.

C-1.14: Historic property protection in natural disasters. Comply with California Public Resources Code Section 5028 (Natural Disaster Damage to Historic Property).

C-1.15: Public knowledge promotion. Promote public knowledge and understanding of cultural resources (including archaeological, tribal cultural resources, historic resources, and paleontological resources) present within the City.

C-1.17: Educational institution cooperation. Cooperate with the educational institutions and other interested parties to build awareness of the legacy of the city's past and the necessity of its retention.

C-1.18: Historical Preservation Program awareness. Continue to expand information on the Historical Preservation Program available via the City's website.

C-1.19: Historic resource information for property owners. Provide technical information that will help property owners in planning new additions that are complementary to the existing historic structures and conform with the Secretary of the Interior's Standards.

C-1.20: Document and resource sharing. Solicit residents to share or donate historic documents relating to Culver City to the historical society archives or other appropriate institutional oral history program.

Mitigation Measures

In order to ensure that historical resources are properly identified and that impacts on any identified historical resources are reduced, MM CUL-1 is required. This would require research and survey by a qualified architectural historian, evaluation of properties for listing in the National Register, California Register or as a Culver City Cultural Resource, and assessment of project-specific impacts under CEQA thresholds.

MM CUL-1. Prior to development of any project within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified historic resources will be assessed for the project's potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be evaluated for its potential significance under national and state criteria prior to the City's approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.

Level of Significance after Mitigation

It is impossible to know if future development implemented under the Project would avoid substantial adverse impacts on historical resources without information on specific future projects. As a result, it is reasonable to assume that some historical resources would be demolished or altered in an adverse manner over the lifetime of the General Plan 2045 through the 2045 planning horizon. Implementation of Mitigation Measure MM CUL-1 stated above would help to reduce the severity of the impacts. However, even with implementation of Mitigation Measure MM CUL-1, impacts would not be substantially reduced and impacts would remain significant and unavoidable.

Adversely Affect Significance of an Archaeological Resource

Threshold CUL-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Statement CUL-2: Project-related demolition, construction, maintenance, and/or improvement activities would have the potential to cause a potentially significant impact to archaeological resources. Implementation of Mitigation Measure MM CUL-2, standard conditions of approval, and applicable policies in the General Plan 2045 would reduce impacts to archaeological resources to a less-than-significant level.

General Plan 2045

As discussed in this Section, the archival research indicates that 18 known archaeological resources have been previously identified within the city, of which six are historic period archaeological resources, 11 are prehistoric archaeological resources, and one is a multicomponent resource. The NAHC has indicated that the SLF results were positive and identified one resource in their database. The NAHC recommended that the city contact the Gabrielino Tongva Indians of California Tribal Council for more information on this particular resource. See Section 4.17, *Tribal Cultural Resources*, for further information.

The current contents and condition of these resources are unknown as some of these resources were recorded as early as 1950 (and as late as 2019) and therefore it is likely that at least some of the resources have been partially or completely displaced or destroyed by modern development or some other cultural (e.g., looting, road construction) or natural (e.g., erosion, flood events) process. In addition, the exact boundaries of these resources and their horizontal (across the surface) and vertical (below the surface) extent may either be unknown or inconclusive for the same reason and/or if no subsurface archaeological investigations have taken place at the resource. Moreover, it is possible that additional archaeological resources are present within the city that have yet to be discovered and would need to be evaluated for eligibility for listing in the National Register, California Register or as a Culver City Cultural Resource, and for an assessment of project-specific impacts under CEQA thresholds.

Furthermore, some existing improvements within the city (e.g., roads, buildings, structures, etc.) were likely constructed prior to the existence of cultural resources protection laws and may have been built on archaeological resources; therefore, the current or prior existence of development throughout the city does not preclude the presence of archaeological resources located underneath this development. As mentioned in Table 4.4-1 above, several archaeological resources have been identified within the city at depth during archaeological monitoring of construction project sites that have undergone extensive development over the years.

Lastly, the city would have been a highly suitable area for the inhabitation of indigenous people. For instance, Ballona Creek, an 8.8-mile watershed that flows through the city, would have provided native inhabitants with abundant food resources in the past, such as plants and animals, and fresh water. As a result of these findings, the potential for encountering archaeological resources in the city is considered high.

Future development that does not require ground-disturbing activities would cause no impacts on archaeological resources. However, future development initiated under the proposed General Plan 2045 that includes construction-related ground disturbance (e.g., demolition, grubbing/clearing, grading, excavation, trenching, and boring/drilling) are activities that have potential to impact, or cause a substantial adverse change to, archaeological resources. Anticipated development in the city would occur through activities such as infill development on vacant property and through redevelopment, which could result in damage to prehistoric and historic archaeological resources. In addition, infrastructure improvements and other activities requiring ground disturbance could result in damage to or destruction of archaeological resources buried below the ground surface.

The General Plan 2045 Conservation Element includes several policies related to the cataloguing and maintaining an inventory of cultural resources within the city. Policy C-1.21 includes the promotion of programs and policies to protect known archaeological and paleontological sites and Tribal Cultural Resources. The city has also identified standard conditions of approval that would require and specify steps to be taken to avoid damage and promote preservation if unknown archaeological resources were to be uncovered during construction. Therefore, impacts to archaeological resources are considered potentially significant and MM CUL-2 and applicable policies in the General Plan 2045 would serve to reduce the impact to a less-than-significant level.

Projects that identify significant archaeological resources (i.e., those resources that qualify as historical resources or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5 and Public Resources Code Section 21083.2, respectively) and preserve them through avoidance, permanent conservation easements, capping, or incorporation into open space, would reduce impacts on archaeological resources to a level that is less than significant. If preservation in place is not feasible, projects that conduct data recovery programs to recover the scientifically consequential information contained in the archaeological resource would also reduce impacts to less than significant. Finally, mitigation is required to ensure that significant

archaeological resources are properly identified and that the impact on any identified significant resources is reduced.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan within the city. Future development under the Zoning Code Update would be required to comply with all applicable requirements of the Zoning Ordinance, applicable mitigation measures such as MM-CUL-2, and implementing standard conditions of approval to avoid damage and promote preservation of archaeological resources. Therefore, potentially significant impacts to archaeological resources from some future Projects would be reduced to a less-than-significant level with mitigation incorporated.

Applicable Proposed General Plan Goals and Policies

In addition to Goal C-1 and relevant policies above, the following Conservation Element policy addresses archaeological resources.

C-1.21: Protect Archeological, Paleontological, and Tribal Cultural Resources. Promote programs and policies to protect known archeological and paleontological sites and Tribal Cultural Resources.

Mitigation Measures

In order to ensure that ensure that significant archaeological resources are properly identified and that the impact on any identified significant resources is reduced, MM CUL-2 is required.

MM CUL-2: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.

Level of Significance after Mitigation

With implementation of the mitigation measure described above, potential significant impacts related to archaeological resources would be reduced to a less-than-significant level.

4.4.5 Cumulative Impacts Analysis

The cumulative analysis for impacts on cultural resources considers a broad regional system of which the resources are a part. The geographic context for the analysis of cumulative impacts associated with cultural resources is the Planning Area and the larger Los Angeles County region, where common patterns of prehistoric and historic development have occurred.

Historic Resources

Future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of historical resources, thus resulting in a potentially significant cumulative impact. There are 204 historic resources that have been previously identified, three designated historic districts, and three Culver City “Landmark” structures are included in the NRHR. However, the city has not been subject to a comprehensive citywide historic resources survey and all historic-age structures are potential historical resources. Therefore, there is the possibility growth anticipated under the proposed General Plan 2045 could adversely affect historical resources. The city cannot be sure that all impacts on historical resources can be mitigated to less-than-significant levels. Even with implementation of proposed General Plan 2045 policies, as well as applicable local, state, and federal laws and MM CUL-1, the Project’s contribution to this potentially significant cumulative impact would be cumulatively considerable.

Archaeological Resources

Future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of archaeological resources, thus resulting in a potentially significant cumulative impact. There are 18 known archaeological resources that have been previously identified within the city. Additional unrecorded archaeological resources may also exist. Future development projects that may result from implementation of the Project may involve grading, excavation, or other ground-disturbing activities, which could disturb or damage unknown archaeological resources. Consequently, the Project may have the potential to contribute to cumulative impacts on archaeological resources. However, with implementation of MM CUL-2, the Project’s contribution to this potentially significant cumulative impact would not be cumulatively considerable.

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4.5 Energy

4.5.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on energy from implementation of the Project, including potential impacts related to consumption of energy resources and conflict with State or local renewable energy plans. The section provides context regarding the Planning Area's existing conditions, as well as relevant federal, State, and local regulations and programs.

4.5.2 Environmental Setting

Regional Context

Electricity

Electricity, a consumptive utility, is a human-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is 1 million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is 1 billion Wh.

Southern California Edison (SCE) provides electrical services to 15 counties, 180 incorporated cities (including a majority of Culver City), and approximately 15 million people throughout its 50,000-square-mile service area, across central, coastal and southern California, an area bounded by Mono County to the north, Ventura County to the west, San Bernardino County to the east, and Orange County to the south.¹ SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 MW), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 MW), and geothermal sources. In 2022, the SCE power system experienced a peak demand of 24,345 MW (the most recent year for which data are available).² Approximately 45 percent of the SCE 2022 electricity purchases were from renewable sources, which is higher than

¹ Southern California Edison, 2023a. About Us- Who We Are. <https://www.sce.com/about-us/who-we-are>. Accessed January 2024.

² Southern California Edison, 2023b. 2022 Annual Report, p. 2.

the approximate 36 percent statewide percentage of electricity purchases from renewable sources.^{3,4} The annual electricity sale to customers in 2022 was approximately 84,218 GWh.⁵

The Los Angeles Department of Water and Power (LADWP) provides electricity to the remaining portions of the city. LADWP provides electrical service throughout the City of Los Angeles, as well as a portion of the Planning Area, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Planning Area is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2022 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 8,101 MW.⁶ On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,502 MW.⁷ Approximately 35.2 percent of LADWP's 2021 electricity purchases were from renewable sources, which is similar to the 33.6 percent statewide percentage of electricity purchases from renewable sources.⁸ The annual electricity sale to customers for the 2022 fiscal year was approximately 21,310 GWh.⁹

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs but relies upon out-of-state imports for nearly 90 percent of its natural gas supply.¹⁰ A majority of natural gas consumed in California is for electricity generation, along with the industrial, residential, and commercial sections.¹¹ Among energy commodities consumed in California, natural gas accounts for approximately 31 percent of total energy consumption.¹² Natural gas is typically measured in terms of cubic feet (cf) or British thermal units (BTU).

³ Southern California Edison, 2023c. 2022 Sustainability Report, p. 15.

<https://www.edison.com/sustainability/sustainability-report> . Accessed January 2024.

⁴ California Energy Commission, 2023a. 2022 Total System Electric Generation. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation>. Accessed January 2024.

⁵ Southern California Edison, 2023b. 2022 Annual Report, p. 2.

⁶ Los Angeles Department of Water and Power, 2022. 2022 Power Strategic Long-Term Resource Plan, p. ES-5.

⁷ Los Angeles Department of Water and Power, 2022. 2022 Power Strategic Long-Term Resource Plan, p. ES-5.

⁸ California Energy Commission, 2023b. 2021 Power Content Labels. Updated January 31, 2023.

⁹ Los Angeles Department of Water and Power, 2023. Briefing Book 2022-2023, p. 61. https://ladwp-jtti.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/3/2023/05/18120930/2022-23_Briefing_Book_Online.pdf. Accessed January 2024.

¹⁰ California Energy Commission, 2023c. Supply and Demand of Natural Gas in California. <https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california>. Accessed January 2024.

¹¹ Ibid.

¹² California Energy Commission, 2023d. Final 2022 Integrated Energy Policy Report Update, p. 123. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update>. Accessed January 2024.

Natural gas is provided to the city by Southern California Gas (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the city of Visalia to the Mexican border.¹³

SoCalGas receives gas supplies from several sedimentary basins in the western U.S. and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.¹⁴ The traditional, southwestern U.S. sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.¹⁵ The annual natural gas sale to customers in 2022 was approximately 897,170 million cf.¹⁶

Transportation Energy

According to the California Energy Commission (CEC), fossil gas accounted for approximately 31 percent of California's total energy consumption in 2021 based on a carbon dioxide equivalent basis.¹⁷ In 2022 (the most recent year for which data are available), California consumed 13.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.¹⁸ Petroleum-based fuels account for 89 percent of California's transportation fuel use.¹⁹ California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gases (GHGs) from the transportation sector, and reduce vehicle miles traveled (VMT). Additionally, California is transitioning to zero-carbon, renewable sources of power while rapidly electrifying large segments of the economy. The CEC predicts that the demand for gasoline and transportation fossil fuels in general will continue to decline as the sales of electric vehicles increases. New zero-emission vehicle sales grew from less than 8 percent in 2020 to more than 25 percent in the third quarter of 2023.²⁰ According to fuel

¹³ Southern California Gas, 2023. Company Profile. <https://www.socalgas.com/about-us/company-profile>. Accessed January 2024.

¹⁴ California Gas and Electric Utilities, 2023. 2023 California Gas Report, p. 36. https://www.socalgas.com/sites/default/files/Joint_Biennial_California_Gas_Report_2023_Supplement.pdf. Accessed January 2024.

¹⁵ Ibid.

¹⁶ Ibid, p. 36. Daily natural gas usage in 2022 was 2,458 million cf; annual value derived by multiplying daily values by 365 days.

¹⁷ California Energy Commission, 2023e. Draft 2023 Integrated Energy Policy Report, p.A-1. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=253086>. Accessed January 2024.

¹⁸ California Energy Commission, 2024. 2022 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division. <https://www.energy.ca.gov/sites/default/files/2023-08/2010-2022%20CEC-A15%20Results%20and%20Analysis%20ADA.xlsx>. Accessed January 2024.

¹⁹ California Energy Commission, 2023f. 2021–2023 Investment Plan Update for the Clean Transportation Program. December 17, 2021.

²⁰ CEC, 2023e. *Draft 2023 Integrated Energy Policy Report*, November 13, 2023, p. 2. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=253086>. Accessed January 2024.

sales data from the CEC, fuel consumption in Los Angeles County (County) was approximately 3.1 billion gallons of gasoline and 0.3 billion gallons of diesel fuel in 2022.²¹

Existing Conditions

Culver City is a mix of residential, commercial, retail, office, industrial, school, recreational, and open space land uses. Everyday operational activities at these residential and non-residential uses result in the energy demand associated with building electricity and natural gas consumption and transportation fuel consumption. However, data with respect to the exact activity level (i.e., utility consumption, trip generation) and building energy standards for each use is not obtainable. Therefore, existing energy estimates are based on default parameters in the California Emissions Estimator (CalEEMod) for area and building energy sources. Existing transportation fuel demand for mobile sources are based on VMT²² and on-road mobile source fuel demand factors from the CARB on-road vehicle emissions factors (EMFAC2021) model. **Table 4.5-1, *Estimated Existing Operational Energy Demand***, presents the energy demand from the existing development in Culver City.

**TABLE 4.5-1
ESTIMATED EXISTING OPERATIONAL ENERGY DEMAND**

Energy Type	Annual Quantity ^{1,2}
Electricity Demand – Existing (MWh)	
Residential	64,510 MWh
Commercial	522,727 MWh
Industrial	35,662 MWh
Institutional	1,330 MWh
Total Electricity	624,230 MWh
Natural Gas Demand – Existing (cf)	
Residential	163.1 Mcf
Commercial	555.7 Mcf
Industrial	36.5 Mcf
Institutional	<0.1 Mcf
Transportation	26.7 Mcf
Total Natural Gas	782.0 Mcf
Transportation (Gallons)	
Gasoline	26.71 Mgal
Diesel	7.86 Mgal

NOTES: MWh = megawatt-hours; Mcf = million cubic feet; Mgal = million gallons

¹ Detailed calculations are provided in Appendix D of this PEIR.

² Totals may not add up due to rounding of decimals.

SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT data).

²¹ California Energy Commission, 2024. 2022 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division. <https://www.energy.ca.gov/sites/default/files/2023-08/2010-2022%20CEC-A15%20Results%20and%20Analysis%20ADA.xlsx>. Accessed January 2024.

²² Fehr & Peers, 2024.

4.5.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

Energy Policy Act of 1992

The Energy Policy Act set goals, created mandates, and amended utility laws to increase clean energy use and improve overall energy efficiency in the United States. It established regulations requiring certain federal, state, and alternative fuel provider fleets to build an inventory of alternative fuel vehicles. It was amended several times in the Energy Conservation and Reauthorization Act of 1998 and in 2005 via the Energy Policy Act in 2005, which emphasized alternative fuel use and infrastructure development.

Energy Policy Act of 2005

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy. The Renewable Fuel Standard (RFS) program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States.

United States Department of Transportation, United States Department of Energy, and United States Environmental Protection Agency

On the federal level, the United States Department of Transportation (USDOT), United States Department of Energy (USDOE), and United States Environmental Protection Agency (USEPA) are three agencies with substantial influence over energy policies related to transportation fuels consumption. Generally, federal agencies influence transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks through funding energy-related research and development projects, and through funding for transportation infrastructure projects.

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors,

heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.²³ USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.²⁴

In March 2020, USDOT and USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.²⁵ These standards set a combined fleet wide average of 36.9 to 37 miles per gallon (mpg) for the model years affected.²⁶ On January 20, 2021, President Biden issued Executive Order 13990 “Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis” directing USEPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule for Model Years 2021–2026. In February 2022, USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.²⁷ This final rule revises current GHG standards beginning for vehicles in model year 2023 through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.²⁸

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for carbon dioxide (CO₂) emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons.

²³ U. S. Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011. <https://www.nhtsa.gov/sites/nhtsa.gov/files/detailed-fact-sheet.pdf>. Accessed January 2024.

²⁴ USEPA, Federal Register / Vol. 81, No. 206 / Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2016.

²⁵ USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020. <https://www.federalregister.gov/documents/2020/04/30/2020-06967/the-safer-affordable-fuel-efficient-safe-vehicles-rule-for-model-years-2021-2026-passenger-cars-and>. Accessed January 2024.

²⁶ Ibid.

²⁷ USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

²⁸ USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

On July 28, 2023, the NHTSA proposed new CAFE standards for passenger cars and light trucks for model years 2027 through 2032, and new fuel efficiency standards for heavy-duty pickup trucks and vans for model years 2030 through 2035. The proposed rule would require an industry fleet-wide average of approximately 58 mpg for passenger cars and light trucks in model year 2032, by increasing fuel economy by two percent year over year for passenger cars and four percent year over year for light trucks.²⁹ For heavy-duty pickup trucks and vans, the proposed rule would increase fuel efficiency by 10 percent year over year.³⁰

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and the NHTSA actions described above (refer to United States Department of Transportation, United States Department of Energy, and United States Environmental Protection Agency, above) (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”³¹

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and CAFE regulations.

²⁹ National Highway Traffic Safety Administration, 2023. Corporate Average Fuel Economy. <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy#75896>. Accessed January 2024.

³⁰ Ibid.

³¹ A “green job,” as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

State

California Building Standards Code (Title 24, Parts 6 and 11)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective January 1, 2023. The 2022 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2019 national standards.³²

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, became effective in 2023. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality.³³ For example, the 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Refer to Section 4.7, *Greenhouse Gas Emissions*, of this PEIR, for additional details regarding these standards.

California Appliance Efficiency Regulations

The 2012 Appliance Efficiency Regulations (CCR, Title 20, Sections 1601 through 1608) took effect February 13, 2013. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

Renewables Portfolio Standard

The State has adopted regulations to increase the proportion of electricity from renewable sources. In 2008, Executive Order S-14-08 expanded the State's Renewable Portfolio Standard (RPS) goal to 33 percent renewable power by 2020. In 2009, Executive Order S-21-09 directed CARB (under its Assembly Bill [AB] 32 authority) to enact regulations to help the State meet the 2020 goal of 33 percent renewable energy. The 33 percent by 2020 RPS goal was codified with the passage of Senate Bill (SB) X1-2. This new RPS applied to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators. SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030, including interim targets of 40 percent by 2024 and 45 percent by 2027. In 2018, SB 100 further increased California's RPS and requires retail sellers and local POUs to procure eligible renewable electricity for 44 percent of retail sales by the end of 2024, 52 percent by the end of 2027, and 60 percent by the end of 2030; and requires that CARB

³² California Energy Commission, 2022. 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. August 2022.

³³ California Building Standards Commission, 2022. Guide to the 2022 California Green Building Standards Code Nonresidential. July.

should plan for 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.

California Senate Bill 1389

SB 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code Section 25301(a)). The Integrated Energy Policy Report provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emissions vehicles, energy equity, climate change adaptation, electricity reliability in the Southern California region, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

California Assembly Bill 1493

In response to the transportation sector's large share of California's CO₂ emissions, AB 1493 (commonly referred to as the Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light-duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017–2025.^{34,35} As discussed above, in September 2019, USEPA published the SAFE Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, Sections 51310–51363) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. On January 20, 2021, President Biden issued Executive Order 13990 "Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis" directing USEPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule for Model Years 2021–2026. In February 2022, USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.³⁶ This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establish the most stringent GHG standards

³⁴ California Air Resources Board, 2023a. California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley). <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>. Accessed January 2024.

³⁵ USEPA, 2012. EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks.

³⁶ USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.³⁷

California Health and Safety Code (HSC), Division 25.5, California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. Under HSC Division 25.5, CARB has the primary responsibility for reducing the State’s GHG emissions; however, AB 32 also tasked the CEC and the CPUC with providing information, analysis, and recommendations to CARB regarding strategies to reduce GHG emissions in the energy sector.

In 2016, the California State Legislature adopted SB 32 and its companion bill, AB 197, which amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure that the benefits of state climate policies reach into disadvantaged communities. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding these regulations.

Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. Building off AB 32, SB 350 established California’s 2030 GHG reduction target of 40 percent below 1990 levels. To achieve this goal, SB 350 set ambitious 2030 targets for energy efficiency and renewable electricity, among other actions aimed at reducing GHG emissions. SB 350 increased California’s renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030 prior to the current goals set by SB 100. In addition, SB 350 requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030.

Low-Carbon Fuel Standard

The Low-Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10 percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.

³⁷ USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

California Air Resources Board

CARB's Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.³⁸ The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the zero-emission vehicle (ZEV) regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. Implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered. Effective November 26, 2019, the federal SAFE Vehicles Rule Part One: One National Program withdraws the California waiver for the GHG and ZEV programs under section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Cars and ZEV mandates. On March 9, 2022, USEPA issued a notice of decision to reinstate California's Clean Air Act waiver for its Advanced Clean Car regulations.³⁹

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package was presented to the Board in June 2022 and was adopted on November 30, 2022.

CARB's Advanced Clean Trucks Program

The Advanced Clean Trucks (ACT) regulations were approved on June 25, 2020, and require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. The goal of this proposed strategy is to achieve nitrogen oxide (NOx) and GHG emission reductions through advanced clean technology, and to increase the penetration of the first wave of zero-emissions heavy-duty technology into

³⁸ California Air Resources Board, 2023a. California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley). <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>. Accessed January 2024.

³⁹ USEPA, 2022. California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Notice of Decision, 87 Fed. Reg. 14,332 (March 14, 2022).

applications that are well suited to its use. According to CARB, “Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the State Implementation Plan (SIP), Sustainable Freight Action Plan, SB 350, and AB 32.”⁴⁰

The percentage of zero-emissions truck sales is required to increase every year until 2035 when sales would need to be 55 percent of Classes 2b–3 (light/medium- and medium-duty trucks) truck sales, 75 percent of Classes 4–8 (medium- to heavy-duty trucks) straight truck sales, and 40 percent of truck tractor (heavy-duty trucks weighing 33,001 pounds or greater) sales. Additionally, large fleet operators (of 50 or more trucks) would be required to report information about shipments and services and their existing fleet operations.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 CCR Section 2485 and Title 17 CCR Section 93115). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

⁴⁰ California Air Resources Board, 2023b. Advanced Clean Trucks Program. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/about>. Accessed January 2024.

Sustainable Communities Strategy

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG, was adopted by the state on September 30, 2008. Under SB 375, CARB is required, in consultation with the State's metropolitan planning organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the GHG emissions reduction targets of 8 percent by 2020 and 13 percent by 2035 relative to 2005 GHG emissions for the Southern California Association of Governments (SCAG), which is the MPO for the region in which the city is located.⁴¹ Of note, the proposed reduction targets explicitly exclude emission reductions expected from the AB 1493 and the Low Carbon Fuel Standard regulations.

Under SB 375, the reduction target must be incorporated within each region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans and zoning codes) are not required to be consistent with either the RTP or SCS. See detailed discussion of SCAG's RTP/SCS below.

California Environmental Quality Act

In accordance with CEQA and CEQA Guidelines Appendix F, Energy Conservation, and to assure that energy implications are considered in project analysis and decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. CEQA Guidelines Appendix F provides a list of energy-related topics that should be analyzed in an EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix F, Energy Conservation, Section II.B. indicates that environmental impacts may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed,
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.

⁴¹ Southern California Association of Governments, 2023. Greenhouse Gases. <https://scag.ca.gov/greenhouse-gases>. Accessed January 2024.

The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Regional

Southern California Association of Governments

SB 375 requires each Metropolitan Planning Organization (MPO) to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020-2045 RTP/SCS, adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016-2040 RTP/SCS.

The 2020-2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020-2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of eight percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, the 2020-2045 RTP/SCS includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets. In addition, refer to Section 4.6, *Greenhouse Gas Emissions*, of this PEIR for additional details regarding these requirements.

South Coast Air Quality Management District

As discussed in Section 4.2, *Air Quality*, of this PEIR, the South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the South Coast Air Basin (where the city is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. As part of its efforts to reduce local air pollution, SCAQMD has promoted a number of programs to promoted energy conservation, low-carbon fuel technologies (natural gas vehicles; electric-hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, VMT reduction programs, and market incentive programs.

Local

Culver City Municipal Code

Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to the Culver City Municipal Code (CCMC) Section 15.02.105, the City requires 1 kilowatt (kw) of PV power

installed per 10,000 square feet (sf) of new development.⁴² The CCMC includes an option to pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. Under Section 17.320.035 of the CCMC, the City goes beyond CALGreen Building Code standards and requires at least 20 percent EV capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.⁴³ Additionally, Sections 4.408.1 and 5.408.1, Construction Waste Management, require that a minimum of 75 percent of nonhazardous construction and demolition waste be recycled and/or salvaged for reuse.

In 2009, the City adopted the Green Building Program as CCMC Chapter 15.02.100, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting has to be either fluorescent, LED or other type of high-efficiency lighting, and specific features for parking garages would require all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

Culver City Bicycle & Pedestrian Action Plan

The current Circulation Element provides objectives and policies to encourage the use of public transit and provide safe and attractive pedestrian facilities thereby encouraging more people to reduce automobile travel in favor of alternative forms of transportation.⁴⁴ The City updated the Bicycle & Pedestrian Master Plan with the Action Plan which received public input from 2017 through 2019. The Action Plan was adopted by the City Council in June 2020.⁴⁵ The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community.

Culver City Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Culver City. With this change, CPA purchases the renewable energy resources for electricity and SCE delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity

⁴² Culver City Municipal Code. Title 15, Section 15.02.105, California Building Code Adopted by Reference with Local Amendments. https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-76668. Accessed March 2023.

⁴³ Culver City Municipal Code. Title 17, Section 17.320.035, Parking Design and Layout Guidelines. https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed March 2023.

⁴⁴ Culver City, 1995. Circulation Element, p. C-8.

⁴⁵ Culver City, 2020. Bicycle & Pedestrian Action Plan.

needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA to remain with SCE as their provider. The Project's energy analyses conservatively assume the Project will remain with SCE as their electricity provider and does not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2022 based on the required renewables by year 2024 under SB 100.⁴⁶

Culver City Reach Code

The Culver City Reach Code, codified under CCMC Section 15.02.1100, establishes building energy efficiency standards that are additional to the standards established by the State's CALGreen Building Code and Title 24 Energy Code requirements. The Culver City Reach Code includes provisions for all new buildings with separate standards for buildings of 49,999 sf or less (Category 1) and buildings 50,000 sf or more (Category 2). The following requirements do not apply to one- and two-family residences.

For Category 1 buildings, the Reach Code provides a list of 25 items that new buildings can implement in order to meet the standards. A project must comply with at least 80 percent of all items listed. Examples include: gas heating units being 93 percent energy efficient, installing radiant barriers on all new roof sheathing, installing high efficiency lighting in all exterior and interior spaces, and installing 1 kW of solar photovoltaic.

For Category 2 buildings, the Reach Code establishes three mandatory requirements related to LEED certification. The requirements include the following:

- (1) Prior to the issuance of a building permit, the applicant shall submit:
 - a. Evidence that a LEED Accredited Professional (AP) is one of the members of the project team
 - b. Evidence that the project has been registered with the United States Green Building Council's (USGBC's) LEED Program
 - c. Complete a LEED Checklist including points allocated to the "Innovation and Design" category, which demonstrates that the project meets the selected LEED® Rating System at the "Certified" level or higher.
 - d. A signed declaration from the LEED®-AP member of the project team, stating that the plans and plan details have been reviewed and the project meets the intent of the criteria for certification of the selected LEED® Rating System at the "Certified" level or higher.
- (2) The project shall comply with USGBC's "3 point margin of error" for LEED Certification.
- (3) Applicant shall submit to the Building Official copies of all correspondence between the applicant and USGBC regarding the project.

⁴⁶ For the purposes of estimating energy demand, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related demand would be lower than those disclosed in this section.

4.5.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold ENG-1:** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- Threshold ENG-2:** Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Methodology

Construction

Construction of new development that could occur from the General Plan 2045 would have the potential to increase energy consumption through the use of heavy-duty construction equipment, such as excavators, cranes, and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from project sites.

The Project is a planning-level document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Therefore, quantification of energy consumption associated with buildout cannot be specifically determined at this time. Therefore, the analysis will be based on the potential for construction energy consumption to exceed threshold values in the context of development intensity and compliance with regulatory standards.

Operation

Operation of new development that could occur from adoption of the proposed General Plan 2045 would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation-fuels, primarily gasoline, for vehicles traveling to, from, and within the city. Detailed emissions calculations are provided in Appendix D of this PEIR.

Electricity

The estimated electricity demand that would occur from new developments that could occur under the General Plan 2045 is analyzed relative to SCE's existing energy supplies available to serve the city. Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) from operations was calculated using demand factors provided in CalEEMod based on the 2022 Title 24 Standards, which went into effect on January 1, 2023. While the Title 24 standards are typically revised every three years with more stringent energy efficiency requirements, it is not known to what extent future revisions to the Title 24 standards would reduce energy demand from new buildings. Therefore, it is not possible to accurately quantify the effects of future revisions to the Title 24 standards on energy demand from new buildings. Energy usage from water demand (e.g., electricity used to supply, convey, treat, and

distribute) are estimated based on the new development that could occur under the General Plan 2045. The assessment also includes a discussion of the proposed General Plan 2045's compliance with relevant energy-related regulatory measures, that would minimize the amount of energy usage from new development under the General Plan 2045. For the purposes of estimating energy demand, since customers can choose to opt out of the CPA, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related demand would be lower than those disclosed in this section. These measures are also discussed in Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, of this PEIR.

Natural Gas

The estimated natural gas demand that would occur from new development under the General Plan 2045 is analyzed relative to SoCalGas' existing and planned energy supplies in 2045 (i.e., the buildout year). Natural gas demand from new development under the General Plan 2045 would be generated primarily by building heating and appliances. Natural gas consumption is compared to both supply and infrastructure availability.

Transportation Fuels

Energy for transportation from visitors and residents traveling to and from new development that could occur under the General Plan 2045 is estimated based on transportation fuel consumption factors from EMFAC along with VMT data, which considers mode and trip lengths, developed for the transportation analysis. Fuel consumption from motor vehicles is dependent on vehicle type. Thus, the factors were calculated using a representative motor vehicle fleet mix based on the CARB EMFAC2021 model and default fuel types. EMFAC2021 incorporates the SAFE Vehicles Rule as well as the Advanced Clean Truck Program. However, traffic reduction policies within the General Plan 2045 Mobility Element, to which the regional travel demand model may not be fully sensitive (such as connectivity in neighborhoods, presence of bicycle and pedestrian facilities, and transportation demand management measures), may not be fully reflected in the VMT and transportation fuel consumption estimates. Therefore, estimated mobile source transportation fuel consumption is conservatively higher. Transportation fuel consumption is compared to both supply and infrastructure availability.

Project Impact Analysis

Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Threshold ENG-1: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Updates would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Impact Statement ENG-1: The Project would result in a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during construction and/or operation.

Construction

During construction of new development that could occur under the General Plan 2045, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment, construction workers traveling to and from development sites, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Electricity

Construction electricity would be consumed, on a limited basis, to power lighting, electric equipment, and supply and convey water for dust control. During construction of new development that could occur under the General Plan 2045, the electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, and used for necessary construction-related activities. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Furthermore, the electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related energy use from more traditional construction-related energy such as diesel fuel. Therefore, the impact from construction electrical demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would generally not be supplied to support construction activities; thus, there would be no expected demand generated by future construction that could occur under the General Plan 2045. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would specifically be used to replace or offset diesel-fueled equipment and as such would not result in substantial on-going demand. Therefore, the impact from construction natural gas demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Transportation Energy

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be supplied domestically or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.⁴⁷

⁴⁷ BP, 2021. Statistical Review of World Energy 2021, 70th edition, <https://www.bp.com/content/dam/bp/business-sites/en/global/corporate/pdfs/energy-economics/statistical-review/bp-stats-review-2021-full-report.pdf>. Accessed January 2024.

Construction of new development that could occur under the General Plan 2045 would utilize fuel-efficient equipment consistent with state and federal regulations, such as the fuel efficiency regulations in accordance with the Advanced Clean Cars and Advanced Clean Truck Program, which would result in more efficient use of transportation fuels (lower consumption). Construction equipment and vehicles would also be required to comply with anti-idling regulations in accordance with Section 2485 in Title 13 of the CCR, and fuel requirements in accordance with Section 93115 in Title 17 of the CCR. As such, construction of new development would comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While some of these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines.

Based on the analysis above, construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to, from, and within the city. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of new developments that could occur under the General Plan 2045 would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant.

Operation

During operation of existing development and new development that could occur under the General Plan 2045, energy would be consumed for multiple purposes, including, but not limited to, heating, ventilation, and air conditioning; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed by existing development and new development under the General Plan 2045 during operations related to water usage, solid waste disposal, and vehicle trips. **Table 4.5-2, *Estimated Culver City General Plan 2045 Operational Energy Demand***, shows the net change in energy demand from electricity, natural gas, gasoline, and diesel.

**TABLE 4.5-2
ESTIMATED CULVER CITY GENERAL PLAN 2045 OPERATIONAL ENERGY DEMAND¹**

Energy Type	Annual Quantity ^{2,3}
Electricity	
Existing Development (2019) plus New Development (2045)	
Building Energy and Water Conveyance and Treatment	802,701 MWh
Existing Development (2019)	624,230 MWh
Total Net Electricity	178,471 MWh
Natural Gas	
Existing Development (2019) plus New Development (2045)	
Building Energy and Transportation	1,208.4 Mcf
Existing Development (2019)	782.0 Mcf
Total Net Natural Gas	426.4 Mcf

Energy Type	Annual Quantity ^{2,3}
Transportation	
Existing Development (2019) plus New Development (2045)	
Gasoline	18.08 Mgal
Diesel	4.99 Mgal
Existing Development (2019)	
Gasoline	26.71 Mgal
Diesel	7.86 Mgal
Total Net Transportation – Gasoline	(8.62 Mgal)
Total Net Transportation – Diesel	(2.87 Mgal)
NOTES: MWh = megawatt-hours; Mcf = million cubic feet; Mgal = million gallons	
¹ Detailed calculations are provided in Appendix D of this Draft PEIR.	
² Totals may not add up due to rounding of decimals.	
³ Parentheses denote a negative value	
SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT data).	

Electricity

Operation of new development that could occur under the General Plan 2045 would result in demand for electricity resources including for water supply, conveyance, distribution, and treatment. The estimated operational electricity demand, including from water demand, is provided in Table 4.5-2. As shown in Table 4.5-2, the operation of existing development and new development under the General Plan 2045 would result in a net increase of electricity compared to existing conditions of approximately 178,471 MWh per year.

New development under the General Plan 2045 would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. The values in Table 4.5-2 assume compliance with the 2022 Title 24 Building Energy Efficiency Standards for new development under the General Plan 2045. Since the standards are updated every three years, future new development under the General Plan 2045 would be designed to include energy saving features to comply with future Title 24 standards and CALGreen Code requirements that are not reflected in the quantified values in Table 4.5-2, which may include greater use of energy and water efficient fixtures and fittings, energy efficient mechanical systems, light pollution reduction, site development best practices, sub metering, water efficient landscapes, recycling, and superior weather resistance and moisture management. Further, implementation of policies in the General Plan 2045 would reduce the electricity demand from new development in the city by promoting energy efficiency designs and strategies beyond regulatory requirements and policies for renewable energy. Therefore, operations would not result in the wasteful, inefficient, and unnecessary consumption of electricity.

For the 2019 baseline year, SCE had an annual electric sale to customers of approximately 84,654 GWh.⁴⁸ The increase in future electricity demand from existing development and new

⁴⁸ Southern California Edison, 2023d. 2021 Annual Report, p. 2. <https://www.edison.com/investors/financial-reports-information/annual-reports>. Accessed January 2024.

development under the General Plan 2045 would represent approximately 0.948 percent of the SCE network sales for 2019. Thus, it is likely that the net increase in electricity would generally be served by existing infrastructure capacity and the impact related to electrical supply and infrastructure capacity would be less than significant.

Natural Gas

The new development that could occur under the General Plan 2045 would result in demand for natural gas resources, as shown in Table 4.5-2. As would be the case with electricity, new development would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. The values in Table 4.5-2 assume compliance with the 2022 Title 24 Building Energy Efficiency Standards for new development under the General Plan 2045. Since the standards are updated every three years, future new development would be designed to include energy saving features to comply with future Title 24 standards and CALGreen Code requirements that are not reflected in the quantified values in Table 4.5-2, which could include improvements to water heating efficiency or reduced natural gas-fueled systems in buildings. Further, implementation of policies in the General Plan 2045 would reduce the demand for natural gas from new development in the city by promoting energy efficiency designs and strategies beyond regulatory requirements and policies for renewable energy. Therefore, operations would not result in the wasteful, inefficient, and unnecessary combustion of natural gas.

According to SoCalGas data, natural gas deliveries in baseline year 2019 was 879,285 million cubic feet (cf).⁴⁹ Based on the estimated natural gas consumption as shown in Table 4.5-2, the net increase in future natural gas demand from existing development and new development that could occur under the General Plan 2045 would account for approximately 0.137 percent of SoCalGas' 2019 deliveries. According to the 2022 California Gas Report, SoCalGas is forecasted to require 742,410 million cf in the year 2035, the latest available projected year.⁵⁰ The estimated natural gas demand from existing development and new development that could occur under the General Plan 2045 of 1,208.4 million cf per year would account for approximately 0.163 percent of SoCalGas' projected natural gas demand for the year 2035. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the demand for natural gas at full buildout conditions of the 2045 General Plan. Therefore, it is likely that the net increase in natural gas would generally be served by existing infrastructure capacity and the impact related to natural gas would be less than significant.

Transportation Energy

As discussed above, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world, and based on

⁴⁹ California Gas and Electric Utilities, 2023, 2023 California Gas Report. https://www.socalgas.com/sites/default/files/Joint_Biennial_California_Gas_Report_2023_Supplement.pdf. Accessed January 2024.

⁵⁰ California Public Utilities Commission, 2022, 2022 California Gas Report. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf. Accessed January 2024.

current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.⁵¹

The estimated operational transportation fuel demand from existing development and new development that could occur under the General Plan 2045 is provided in Table 4.5-2. As discussed previously, traffic reduction policies in the General Plan 2045 Mobility Element may not be fully reflected in the VMT and transportation fuel consumption estimates. Therefore, estimated mobile source transportation fuel consumption are conservatively higher.

The location, design, and land uses of the growth anticipated under the General Plan 2045 would implement land use and transportation strategies related to reducing vehicle trips for residents and employees in the city by increasing residential density and housing types at infill locations and near public transit. As discussed in Section 4.16, *Transportation*, of this PEIR, several transit agencies provide local and regional transit service to the residents of Culver City, including Metro, Culver CityBus, Culver CityRide, Santa Monica Big Blue Bus, Los Angeles Commuter Express, and Los Angeles Metro Bus (refer to Table 4.16-1, *Metro Routes Culver City*, in Section 4.16, *Transportation*, of this PEIR).

The General Plan 2045 focuses on infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City's industrial areas. By distributing growth along corridors, including in areas well served by transit, housing will be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and transit-oriented communities (TOC), the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the Inglewood Oil Field (IOF).

The Mobility Element establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation which will result in more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities (Goals M-2, M-3, M-4, M-5, and M-8). Therefore, the General Plan 2045 would support statewide and regional efforts to improve transportation energy efficiency and reduce transportation energy consumption.

As the Project would support statewide and regional efforts to improve transportation energy efficiency, and as discussed in further detail below, the General Plan 2045 would not conflict with

⁵¹ BP, 2021. Statistical Review of World Energy 2021, 70th edition, <https://www.bp.com/content/dam/bp/business-sites/en/global/corporate/pdfs/energy-economics/statistical-review/bp-stats-review-2021-full-report.pdf>. Accessed January 2024.

the 2020-2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better “placemaking,” provide more transportation choices, and reduce vehicular demand and associated emissions. Therefore, the General Plan 2045 would not conflict with the actions and strategies contained in the 2020-2045 RTP/SCS. In fact, as discussed above, the general location of new development that would occur under the General Plan 2045 would not conflict with the recommendations in these documents and would support their goals.

As discussed in Section 4.18, *Utilities and Service Systems*, of this PEIR, AB 341, adopted in 2012, requires that all cities and counties in the State divert 75 percent of their solid waste streams from landfills by 2020. SB 1383, adopted in 2016, establishes goals of 50 percent organics waste reduction by 2020 and 75 percent reduction by 2025. Development of future land uses, as projected in the General Plan 2045, would be required to comply with federal, state, and local statutes and regulations related to solid waste. Furthermore, the policies provided in the General Plan 2045 regarding solid waste disposal and associated public facilities (Policies GHG-5.1, GHG-5.2, GHG-5.3, and PR-7.1) would further ensure compliance with applicable regulations. Compliance with federal, state, and local waste management and reduction statutes and regulations related to solid waste would reduce waste-related transportation energy.

Based on the above, future new development under the General Plan 2045 would minimize operational transportation fuel demand in line with state, regional, and County goals. Therefore, the Project would not lead to wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations as discussed above. Therefore, future development under the Project would result in a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during construction and/or operation.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design Element

Goal LU-1: Transit-oriented communities. Transit-oriented communities within a half mile of high-quality transit mix well-designed development, affordable housing, community services, and improved mobility options.

LU-1.1: Higher densities near transit. Allow higher residential density and intensity in mixed use developments to support walkability and transit use.

LU-1.2: Mix of uses. Encourage more mixed use and affordable housing to support a regional jobs and housing balance, to promote walk-to-work options, and to incorporate public- and neighborhood-serving uses.

LU-1.3: Development near transit stations. Incentivize jobs and housing growth around high-quality transit stops and along transit corridors to reduce reliance on personal

automobiles. Incentivize affordable housing on standalone projects and mixed-income projects within transit-oriented communities.

LU-1.4: Connect transit-oriented communities. Develop strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities.

LU-1.5: Mobility hubs at transit stations. Create mobility hubs at Metro rail stops.

LU-1.6: Parking innovation. Encourage shared parking, unbundled parking, and park once strategies to minimize parking demand, reduce vehicle trips, and capitalize on mobility investments. Locate parking behind buildings and minimize visibility from the public right-of-way.

LU-1.7: Gathering spaces near mobility hubs and transit stations. Partner with project developers to create community gathering spaces, including plazas and pocket parks, near transit stations and mobility hubs.

LU-1.8: Development standards near transit stations. Allow relaxed development standards within a half mile of high-quality transit, such as reduced setbacks and greater building heights.

Goal LU-11: Residential neighborhoods. Complete, walkable single, two-family, and three-family residential neighborhoods provide a variety of housing types and forms and allow neighborhood supportive uses that sustain the needs of residents.

LU-11.9: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

Goal LU-13: Neighborhood multifamily areas. Well-designed neighborhood multifamily areas that provide opportunities for social gathering and amenities for residents in Tellefson Park, Downtown, and West Washington.

LU-13.6: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

Goal LU-14: Public realm design. A network of attractive, pedestrian-oriented, human-scale and well-landscaped streets and civic spaces throughout the city for all ages and abilities.

LU-14.2: Create an attractive pedestrian environment. Facilitate a diverse and attractive pedestrian environment through the provision of street furniture, lighting, and other amenities.

LU-14.3: Pedestrian connections and sidewalks. Improve pedestrian connections and sidewalk infrastructure across the city, especially between residential and commercial areas, keeping in mind mobility needs of children, families, seniors, and people with disabilities.

LU-14.4: Street trees. Require new development to add street trees along streets and public spaces that provide shade, attractive landscaping, and contribute positively towards public health outcomes and climate mitigation and adaptation.

LU-14.6: Sustainable design in the public realm. Encourage use of sustainable design features in the public realm, including sustainable building and construction materials, permeable paving, drought-tolerant landscaping, and green infrastructure.

LU-14.8: Improved street tree canopy. Increase the size and extent of the urban street tree canopy to help shade streets and sidewalks. Review approved street trees and study inclusion of larger tree choices that provide more shade. Review and modify street tree placement and tree well standards to ensure long-term success of street trees.

Goal LU-16: Landscape design for resilience. Landscape design standards for new development enhance habitat quality, reduce water use, support a diverse ecosystem, and increase resilience to a changing climate.

LU-16.2: Waterwise planting palette during new construction. During new construction and landscape renovations, prioritize xeriscaping, low-water-use plants, and native plants, minimizing the total area of high-water-use plants (e.g., turf and water features).

LU-16.5: Irrigation systems for water conservation. Install weather- or soil moisture-based irrigation controllers in all new development. Cluster plants together with similar water requirements to conserve water. Use the Water Use Classification of Landscape Species (WUCOLS) ratings to establish watering needs.

LU-16.6: Water reuse. Encourage on-site water reuse for landscape and ornamental water applications for new and renovation projects.

Goal LU-18: Collaboration with private developers. Collaboration with new private development to take collective action to achieve plan goals and to ensure new development contributes its appropriate share toward the provision of parks, public facilities, and schools.

LU-18.1: Adequate infrastructure and utilities. Ensure adequate infrastructure and utility services (electricity, water, internet) for all future development and when feasible, underground utilities (new and existing) to enhance the public realm.

LU-18.4: Green building. Continually update new construction and retrofit guidelines for green buildings.

Parks, Recreation, and Public Facilities Element

Goal PR-6: Sustainable parks and recreational system and public facilities. Environmentally sustainable practices and education are a cornerstone of the parks, recreation, and open space system and the City's public facilities.

PR-6.4: Carbon footprint reduction. Reduce the carbon footprint of the park, recreational facilities, and other public facilities and green spaces the City owns.

Goal PR-7: Public Facilities. Public facilities in Culver City, including libraries and City-owned facilities, offer high-quality services to the community.

PR-7.1: Public facility maintenance. Maintain and continue to modernize and adjust configuration of public facilities, including City Hall, The Transportation Facility, the Public Works/Parks Maintenance Yard, and the Transfer and Recycling Station. Continue to reinvest in existing facilities to extend their useful lifetimes.

PR-7.2: Long term operations and maintenance cost reduction. Identify ways to reduce the City's long-term operations and maintenance costs, such as adapting more energy-efficient technologies for facilities, using low-water landscape palettes, and using recycled water for irrigation.

Infrastructure Element

Goal INF-2: Water conservation. Water conservation strategies are implemented and expanded citywide to meet sustainability targets and ensure future resiliency.

INF-2-1: Water conservation. Expand and enhance existing water conservation measures, mandates, and strategies to optimize wise use of water.

INF-2.5: Drought-tolerant landscaping. Provide resources and guidance for conventional lawn conversion to drought tolerant landscaping.

INF-2.6: Water use on non-edible irrigated landscapes. Restrict and eliminate potable water use for primarily non-edible irrigated landscapes where alternative water sources are available, including captured rainwater, grey water, and recycled water.

INF-2.8: Dual plumbing. Provide dual plumbing for all new public parks and landscape projects in anticipation of future water recycling or on-site water capture, treatment and re-use infrastructure to be used for irrigation.

Goal INF-4: Water reuse networks. Water reuse networks are expanded and optimized throughout the city at the district and parcel scales.

INF-4.1: Greywater infrastructure. Develop greywater infrastructure to support city, district, and parcel level treatment and reuse strategies.

INF-4.3: Availability of recycled water supply. Explore opportunities to increase the availability of recycled water supply (i.e., install purple-pipe infrastructure).

INF-4.4: Water provisioning. Incorporate recycled and reuse water strategies in water provisioning.

INF-4.5: Incentivize water recycling. Encourage and incentivize water recycling techniques such as rainwater capture barrels and cisterns for outdoor water purposes.

Goal INF-5: Stormwater collection and reuse systems. Stormwater collection and reuse systems are enhanced at the parcel, district, and city scale to improve water quality and reduce runoff.

INF-5.4: Green infrastructure strategies. Integrate green infrastructure strategies into City-owned landscapes. For example, use drought-resistant plants, native plants, recycled water to irrigate, permeable paving, and other low-impact development features. Promote community participation and education of green infrastructure strategies through educational and case-study landscapes that demonstrate multi-benefits.

INF-5.5: Rainwater harvesting. Expand rainwater harvesting tracking systems for capture and reuse.

Goal INF-7: Fossil fuel free energy. Electricity and natural gas infrastructure supports a carbon positive and renewable economy.

INF-7.1: Fossil fuel free energy. Residents and businesses have affordable and easy access to carbon-free and renewable energy sources.

INF-7.2: Local energy generation. Enhance local energy generation and storage to safeguard the city's electrification network against shocks and stressors.

INF-7.3: Energy and open space projects. Align energy conversion and enhancement projects with public open space and trails provisioning.

INF-7.4: Building electrification reach codes. Ensure compliance with adopted Building Reach Code to mandate building electrification.

Mobility Element

Goal M-2: Complete streets. A layered transportation network that is complete and convenient for all travel modes and serves the greatest public good.

M-2.1: Prioritize multimodal projects. Guide project selection and delivery based on complete streets principals and addressing the gaps identified by Bicycle Network Assessment Areas, the Bicycle and Pedestrian Action Plan (BPAP) and American with Disabilities (ADA) Transition Plan.

M-2.2: Cohesive action travel network. Ensure bikeways are integrated with regional bikeways that connect with employment centers and other key land uses and destinations.

M-2.5: Multimodal connectivity. Transform traditional bus stops into mobility centric locations that provide easy access and hassle-free connectivity between modes of transportation.

Goal M-3: Transit and other mobility services. Frequent, reliable, and high-quality public transit and mobility services that are adaptable for the dynamic future of mobility needs, markets, and solutions. Travel behavior shifts from driving to more sustainable modes by establishing comprehensive and high-quality mobility service options and infrastructure. High-quality public transit and mobility services to accommodate the city's growth in population, jobs, and economy.

M-3.3: Mobility options. Continually improve and innovate existing, directly operated mobility services including CityBus and CityRide services and manage and/or collaborate with mobility service providers to provide and improve other mobility services.

Goal M-4: Equitable access. A transportation system that provides affordable or free, equitable, and efficient access to employment centers, residential communities, schools, and other essential services.

M-4.1: Integrated public transportation services. Manage and operate integrated transportation services, other multimodal mobility services, and resources to provide convenient and reliable options for daily trips.

M-4.2: First/last-mile barriers. Prioritize investments that reduce first/last-mile barriers to transit stops and encourage alternative transportation options for daily activities and/or improve access to high quality jobs.

M-4.3: Access to mobility in SB 1000 Priority Neighborhoods. Improve access to mobility services and implement multimodal improvements in Senate Bill 1000 Priority Neighborhoods.

M-4.4: Bicycle parking. Provide secure and covered bicycle parking at key destinations, including all public parking garages.

M-4.5: Equitable transit access. Work with transit agencies to enhance services in areas lacking convenient transit access, including increased service frequency and spans.

M-4.6: Accessible pedestrian facilities. Construct pedestrian facilities, including sidewalks and controlled crossings, that are ADA-compliant and connect with key land uses and regional and local transit services.

M-4.7: Mobility service geographic prioritization. Prioritize expanding alternative mobility services and resources to communities with limited access to transit and developing a connected multimodal network across the city.

M-4.8: Public transit and mobility service prioritization. Continue to prioritize dignified public transit and mobility services to accommodate people with mobility impairments, non-traditional schedules, and families that need flexible mobility options.

Goal M-5: Sustainable and accessible transportation system and transit-oriented communities. A sustainable and accessible transportation system that provides great multimodal travel experience for residents, workers, and visitors through mobility planning, transportation demand management, and transit-oriented districts, corridors, and developments.

M-5.2: Mobility paradigm shift. Shift the mobility paradigm toward sustainable modes by offering equitable alternative mobility choices and transforming the multimodal travel experience. Implement multimodal street transformations with expanded sustainable mobility services, enhanced access to mobility services, and other strategies to improve the travel experience.

M-5.3: Transportation demand management implementation. Deploy TDM measures citywide to shift the mobility paradigm by promoting and incentivizing the use of non-drive alone and sustainable mobility options.

M-5.4: Transportation demand management requirements. Require employers and new developments to effectively reduce the number of single-occupancy vehicle trips they generate and ensure safe and comfortable access for the local multimodal network, including promoting and incentivizing the use of transit, walking, and cycling over driving.

Goal M-8: Active transportation. An active transportation network that supports healthy living and expands access to social determinants of health.

M-8.5: Bicycle and Pedestrian Action Plan (BPAP) alignment. Align with the BPAP and expand the network recommendations as needed to facilitate a complete and interconnected citywide active transportation network.

Greenhouse Gas Reduction Element

Goal GHG-2: Green buildings. Green and decarbonized buildings are the standard for new construction, major renovations, and existing building retrofits.

GHG-2.1: Clean power access. Maintain access for residents and businesses to carbon-free and renewable energy sources through the Clean Power Alliance and partnerships with Southern California Edison.

GHG-2.2: All electric buildings. Foster a transition to all-electric buildings.

GHG-2.3: Water efficiency. Encourage implementation of both residential and nonresidential voluntary measures of the California Green Building Standards Code (CALGreen) to reduce or eliminate potable water use outdoors.

GHG-2.4: Energy and water efficiency. Improve the energy and water efficiency of new and existing buildings.

GHG-2.5: Productive Roofs. Maintain and distribute guidelines for solar generation or green roofs on available roof space in new developments and major renovations, in alignment with City solar photovoltaic requirements. Encourage the use of green and/or cool roofs in new construction.

GHG-2.6: Passive heating and cooling. Encourage and ensure dissemination of resources for solar energy generation and passive heating and cooling strategies.

GHG-2.7: Efficiency outreach. Educate residents and businesses on available incentive and rebate opportunities to reduce energy and water use.

Goal GHG-3: Municipal buildings and facilities. The environmental efficiencies and performance of municipal buildings, facilities, landscaping, and parks in Culver City is improved.

GHG-3.1: Green rating system. Encourage all new municipal buildings and facilities to meet a minimum LEED silver rating as certified by the US Green Building Council or equivalent green building rating system. Consider feasibility studies for zero net energy use via on-site renewable energy generation and on-site battery storage.

GHG-3.2: Benchmarking. Regularly benchmark the environmental performance of municipal buildings, landscaping, parks, and facilities.

GHG-3.3: Energy efficiency improvements. To reduce operating and maintenance costs, use benchmarking data to identify opportunities for environmental performance improvements through equipment replacements, audits, retro-commissioning, and building retrofits.

GHG-3.4: Waste diversion. Encourage municipal construction projects to achieve 75 percent waste diversion from the landfill.

GHG-3.5: Battery storage. Encourage municipal building and new facility construction and major renovation projects to evaluate the feasibility of incorporating onsite batteries that store electricity from onsite renewable energy generation to supply the building and community with electricity in the event of a disaster.

Goal GHG-4: Decarbonized transportation sector. GHG emissions from the transportation sector are eliminated.

GHG-4.1: Zero emission vehicles. Enable the shift to zero emission vehicles.

GHG-4.2: Public electric vehicle (EV) chargers. Install additional EV chargers at suitable public facilities and curbside, including Downtown parking structures, community parks, and mobility hubs.

GHG-4.3: Multi-unit residential dwelling EV chargers. Develop policies, and incentive/rebate programs designed to encourage installation of additional EV chargers in mixed-use dwellings, single-family homes, workplaces, and shopping centers.

GHG-4.4: Zero-emission vehicle fleet purchases. When buying new City vehicles, purchase zero emission vehicles when feasible.

GHG-4.5: Zero emission fuels. Transitioning existing vehicles and construction and maintenance equipment to zero emission fuels.

Goal GHG-5: Zero Waste. Increase resource capture and decrease waste sent to landfills.

GHG-5.1: Zero waste. Achieve zero waste through adoption of circular economy principles such as recovery, reuse, and sharing of resources.

GHG-5.2: Extended producer responsibility. Support producer responsibility policies that place a shared responsibility for end-of-life product management on producers, instead of the general public, while encouraging product design changes that minimize negative impacts on human health and the environment.

GHG-5.3: Zero waste textile program. Explore establishing a zero-waste textile initiative and collection system.

Conservation Element

Goal C-2: Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

C-2.4: Tree planting. Plant and maintain trees to sequester carbon, reduce urban heat, provide habitat, and contribute to the city's character.

Safety Element

Goal S-2: Critical Facilities. Critical facilities have been designed to continue operating after earthquakes and other emergencies or catastrophic events.

S-2.2: Back-up power. Continue to provide back-up power and supplies at critical facilities and identify any critical facilities that may not currently have them to maintain basic functions during emergency situations.

Goal S-10: Heat and air quality. Support resilient building design by helping residents weatherize homes to keep them cooler/warmer and more energy efficient and to improve indoor air quality.

S-10.1: Resilient building design. Achieve zero waste through adoption of circular economy principles such as recovery, reuse, and sharing of resources.

S-10.4: Coordinated transportation system. Promote a zero-emission transportation sector to improve air quality.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would have no impact on wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation.

Conflict with State or Local Renewable Energy Plan

Threshold ENG-2: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Updates would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Statement ENG-2: The Project would result in a less than significant impact related to conflicting or obstructing a state or local plan for renewable energy or energy efficiency during construction and/or operation.

Construction

The construction of new development that could occur under the General Plan 2045 would utilize construction contractors who must demonstrate compliance with applicable regulations. Contractors would need to ensure that construction equipment used for development would comply with federal, state, and regional requirements where applicable. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel-efficiency standards for medium- and heavy-duty trucks that will be phased in over time. Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.⁵² The USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.⁵³ These regulations would have an overall

⁵² U. S. Environmental Protection Agency (USEPA), 2011. Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011. <https://www.nhtsa.gov/sites/nhtsa.gov/files/detailed-fact-sheet.pdf>. Accessed January 2024.

⁵³ USEPA, 2016. Federal Register / Vol. 81, No. 206, Greenhouse Gas Emissions and Fuel-Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2016.

beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes per occurrence and location. Additionally, CARB regulations regarding in-use off-road equipment require older, less efficient equipment to be replaced or repowered with newer, more efficient models or engines. These regulations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. Thus, based on the information above, construction of new development under the General Plan 2045 would comply with existing energy standards and the impact would be less than significant.

Operations

The General Plan 2045 provides an approach to reducing GHG emissions and facilitates associated benefits of reducing energy demand from community activities, including future development under the Project. Future development that could occur under the General Plan 2045 would be designed in a manner that is consistent with the relevant goals and policies from the Greenhouse Gas Reduction Element (Goals GHG-2, GHG-3, GHG-4, and GHG-5), Land Use and Community Design Element (Goal LU-16), Parks, Recreation, and Public Facilities Element (Goals PR-6 and PR-7), Infrastructure Element (Goals INF-2, INF-4, INF-5, and INF-7), Conservation Element (Goal C-2), and Safety Element (Goals S-2 and S-10) that are designed to encourage development that results in the efficient use of energy resources. Additionally, new development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment.

With respect to operational transportation-related fuel usage, future development under the General Plan 2045 would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption through relevant goals and policies outlined in the Land Use and Community Design Element (Goals LU-1, LU-11, LU-13, LU-14, and LU-18) and Mobility Element (Goals M-2, M-3, M-4, M-5, and M-8). Additionally, vehicles associated with new development would be required to comply with transportation fuel economy standards, which are designed to result in more efficient use of transportation fuels. Furthermore, the General Plan 2045 would not conflict with the 2020-2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better “placemaking,” provide more transportation choices, and reduce vehicular demand and associated emissions. The 2020-2045 RTP/SCS includes land use and transportation strategies that are intended to reduce VMT and resulting fuel consumption. The applicable land use strategies in the Land Use and Community Design Element (Goals LU-1, LU-11, LU-13, LU-14, and LU-18) include planning for growth around transit corridors; providing more options for short trips/neighborhood mobility areas; supporting zero emission vehicles and expanding vehicle charging stations; and supporting local sustainability planning. The applicable transportation strategies from the

Mobility Element includes managing through a Transportation Demand Management (TDM) Program (Goal M-5) and including promoting active transportation (Goal M-8). The majority of the 2020-2045 RTP/SCS transportation strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

As discussed in Section 4.16, *Transportation*, of this PEIR, implementation of the General Plan 2045 would improve connections to local and regional transit service and encourage the use of alternative modes of transportation, including walking and biking through supportive land use development. The Planning Area contains existing non-vehicular transportation, such as pedestrian and bicycle facilities and transit services. Several transit agencies provide local and regional transit service for residents, employees and visitors of Culver City, including Metro, Culver CityBus, Culver CityRide, Santa Monica Big Blue Bus, Los Angeles Commuter Express, and Los Angeles Metro Bus.

The Culver City Transit Center is located at the southeast corner of the Slauson Avenue and Sepulveda Boulevard intersection north of the Westfield Mall and SR-90. The Transit Center is an outdoor facility that connects multiple bus services, including Metro Lines 110, 108/358, and 217; and Culver CityBus Lines 3, 4, and 6. City Bus Lines 2 and Rapid 6 also provide service to Slauson Avenue and Sepulveda Boulevard which is next to the Transit Center. Services from the Transit Center connect riders to Metro Rail B (Red), A (Blue), C (Green), and E Line (Expo). Additionally, riders can take Culver CityBus Line 6 or Rapid 6 to the Los Angeles International Airport (LAX) City Bus Center to transfer for free on LAX Shuttle C, which serves all passenger terminals at LAX. Free parking is available at the Culver City Transit Center and the adjacent Westfield Mall parking lot.

The Robertson Transit Hub is located on the east side of Robertson Boulevard between Venice Boulevard and Washington Boulevard. The Transit Hub connects riders to multiple services including Culver City Bus Line 7, Metro Line 17, and Big Blue Bus Line 17. The Transit Hub is adjacent to Metro E Line (Expo) Culver City Station and Metro's Culver City Bike Hub, which provides secure parking for 64 bicycles as well as a variety of bicycle commuter-related services including bike rentals, repairs, classes, and community events. Metro's Culver City Bike Hub also provides a lounge and restroom facility for all rail/bus operators.

The West Los Angeles Transit Center, or the Washington Fairfax Hub, is a terminal located just outside of Culver City limits, directly underneath Interstate Highway 10 on Washington Boulevard and Fairfax Avenue. Although outside of Culver City limits, the West Los Angeles Transit Center serves as an important transit node. Many transit lines begin and terminate at the West Los Angeles Transit Center, including Metro Lines 14, 35, 37, 38, 105, 217, 705 and 780 and Culver City Bus Lines 1 and 4. Refer to Table 4.16-1, *Metro Routes (Culver City)*, in Section 4.16, *Transportation*, of this PEIR, for a summary of transit service in Culver City.

The General Plan Mobility Element includes policies in-line with the 2020-2045 RTP/SCS to encourage the use of active transportation and transit, and to limit increases in VMT. Land development patterns, including the density and mix of land uses, coupled with the accessibility

or alternative modes of transportation (e.g., presence of pedestrian and bicycle infrastructure, transit services), have a direct effect on the number, and length, of vehicle trips. The General Plan 2045 reduces VMT by encouraging local government and employers to implement TDM policies that promote VMT reductions and by promoting active transportation by improving bicycle and pedestrian infrastructure (Goals M-2, M-3, M-4, M-5, and M-8). Further, the location, design, and land uses from growth anticipated under the General Plan 2045 would implement land use and transportation strategies from the Land Use and Community Design Element related to reducing vehicle trips for residents and employees of the City through infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors (Goals LU-1, LU-11, LU-13, LU-14, LU-16, and LU-18). The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City's industrial areas by distributing growth along corridors, including in areas well served by transit. As discussed under Impact Statement ENG-1, the General Plan 2045 focuses on infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City's industrial areas. By distributing growth along corridors, including in areas well served by transit, housing will be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and TOC, the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the IOF. The Mobility Element establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation which would result in more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities.

The General Plan 2045 outlines strategies for greater integration of uses in different parts of the city and a better connection between employment and residential uses. It recognizes the physical elements that help define the character of Culver City, including existing residential neighborhoods, special study areas, and industrial and transit corridors. This structure helps establish a clear multi-modal network throughout the city by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities. In addition, proposed improvements to the bicycle, pedestrian, and road networks would make it easier for residents to travel throughout the community. Therefore, the Project would not conflict with RTP/SCS land use and transportation strategies that are intended to reduce VMT and resulting fuel consumption.

Based on the information above, operation of new development under the General Plan 2045 would comply with plans for energy efficiency and renewable energy and this impact would be less than significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable state and local plans for renewable energy or energy efficiency. Therefore, future development under the Project would result in a less than significant impact related to conflicting or obstructing a state or local plan for renewable energy or energy efficiency during construction and/or operation.

Applicable Proposed General Plan Goals and Policies

See goals and policies provided under Threshold ENG-1.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would have no impact on conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency.

4.5.5 Cumulative Impacts Analysis

The Project along with other cumulative projects would incrementally contribute to the need for regional energy production and distribution facilities. However, as with the Project, all cumulative development would be required to incorporate energy conservation features to comply with applicable mandatory regulations including CALGreen Code and state energy standards under Title 24. Further, electricity and natural gas facilities are operated and maintained by private utility companies that plan for and accommodate anticipated growth. As described above in ENG-1, implementation of the General Plan 2045 would result in an increase of energy and natural gas usage that would generally be served by existing supply and infrastructure capacity and impacts would be less than significant. All cumulative development projects and development under the Project would be required to comply with CALGreen and Title 24 energy efficiency requirements and other regulations, which would reduce energy consumption by promoting energy efficiency and the use of renewable energy, and incorporate mitigation measures, if applicable. As such, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy nor would it result in a cumulatively considerable contribution to energy use and impacts would be less than significant.

The Project along with other cumulative projects would incrementally contribute to the demand for transportation fuels and would be expected to increase overall VMT. While growth within the Planning Area and region is anticipated to increase the demand for transportation fuels, the Project, as well as other cumulative development projects would be required to demonstrate consistency with federal and state fuel efficiency goals and incorporate, if applicable, any mitigation measures as required under CEQA. The Project would intensify and mix land uses on

key segments of the commercial corridors and allow for new residential and mixed-use development within the City's industrial areas. By distributing growth along corridors, including in areas well served by transit, housing would be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. Siting land use development projects at infill sites is consistent with the state's overall goals to reduce VMT pursuant to SB 375. Additionally, the General Plan 2045 reduces VMT by encouraging local government and employers to implement TDM policies that promote VMT reductions and by promoting active transportation by improving bicycle and pedestrian infrastructure. Therefore, the Project would be consistent with the guidance provided in the SCAG 2020-2045 RTP/SCS to reduce transportation fuel and VMT. Related projects would also need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA, which would also ensure related projects contribute to transportation energy efficiency. Therefore, the impact on the implementation of a state or local plan for renewable energy or energy efficiency would be less than cumulatively considerable. As the Project would incorporate land use characteristics consistent with state goals for reducing VMT, the Project would not have a cumulatively considerable impact related to transportation energy, and impacts would be less than significant.

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4.6 Geology and Soils

4.6.1 Introduction

This section provides an analysis of the potential environmental impacts on geology and soils from implementation of the Project, including potential impacts related to risk of geologic hazards, soil erosion or loss of topsoil, unstable soils, expansive soils, and paleontological resources. The section provides context regarding the existing soils and geologic conditions, including geologic and seismic hazards in the Planning Area, as well as relevant federal, state, and local regulations and programs.

4.6.2 Environmental Setting

Geological Setting

The Planning Area is located within the Peninsular Ranges Geomorphic Province and Los Angeles Basin. The Peninsular Ranges are characterized by northwest-trending blocks of mountain ridges and sediment-floored valleys. The dominant geologic structure features are northwest-trending fault zones that either fade out to the northwest or terminate at east trending faults that form the southern margin of the Transverse Ranges. The Los Angeles Basin is bound by the San Gabriel Foothills to the north; the Santa Ana Mountains and San Joaquin Hills to the east and southeast; and the Santa Monica Mountains to the northwest. Erosion of the surrounding mountains over time has resulted in the deposition of alluvial materials (unconsolidated sediments) in low-lying areas by the Los Angeles River and Ballona Creek.

The predominant rock type that underlies the Peninsular Ranges province is a Cretaceous age igneous rock (granitic rock) referred to as the Southern California batholith. Older Jurassic age metavolcanic and metasedimentary rocks and older Paleozoic limestone, altered schist, and gneiss are present within the province. Cretaceous-age marine sedimentary rocks and younger Tertiary-age rocks comprised of volcanic, marine, and non-marine sediments overlie the older rocks. More recent Quaternary sediments, primarily of alluvial origin, comprise the low-lying valley and drainage areas within the region.

The Planning Area is located on the western side of the Los Angeles Basin, approximately 1.5 miles from the Pacific Ocean. The topography of the Planning Area is relatively flat with areas of rolling hills that vary in elevation from 40 feet above mean sea level (amsl) on the west to approximately 100 feet amsl in the central part. The highest point within the Planning Area is in Baldwin Hills, rising to above 400 feet amsl.

A review of the geologic setting of the Planning Area indicate that younger alluvium deposits (*Qa*) exist within the northern, southern, and western portions of the Planning Area while older alluvium (*Qoa*), Paleosol (*Qop*), artificial fill (*af*), and Sand Pedro Sand (*Qsp*) sediments are present in the southern portion. Lastly, landslide debris (*Qls*) and Inglewood Formation deposits (*Qi*) are also found within the northeastern portion of the city.

Soils and Geologic Hazards

Surface soils are mapped and classified by the United States Department of Agriculture's (USDA's) Natural Resource Conservation Service (NRCS). While the following describes the more predominant soil types within the Planning Area, the general classifications could be grouped into more specific soil types by location, climate, and slope depending on localized conditions.

Figure 4.6-1, *Soils Types within the Planning Area*, shows the types and locations of the different soil types throughout the Planning Area. As shown in Figure 4.6-1, there are four predominant soil types within the Planning Area, which consist of the Cropley-Urban land complex, Longshore-Pachic Haploxerolls complex, Mined Land/Oil Wells, and Urban Land. The most dominant soil type is Urban Land, which is further classified into ten subcategories, as shown in Figure 4.6-1.

Expansive Soils

Expansive soils include clay minerals that are characterized by their ability to undergo significant volume change (shrink or swell) due to variation in moisture content. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, surface drainage, perched groundwater, drought, or other factors. Expansive soils are typically very fine-grained and have a high percentage of clay. Structural damage may occur incrementally over a prolonged period, usually as a result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Soils with high clay content, such as clayey soils in Baldwin Hills, are subject to significant volume change due to variation in soil moisture content.¹

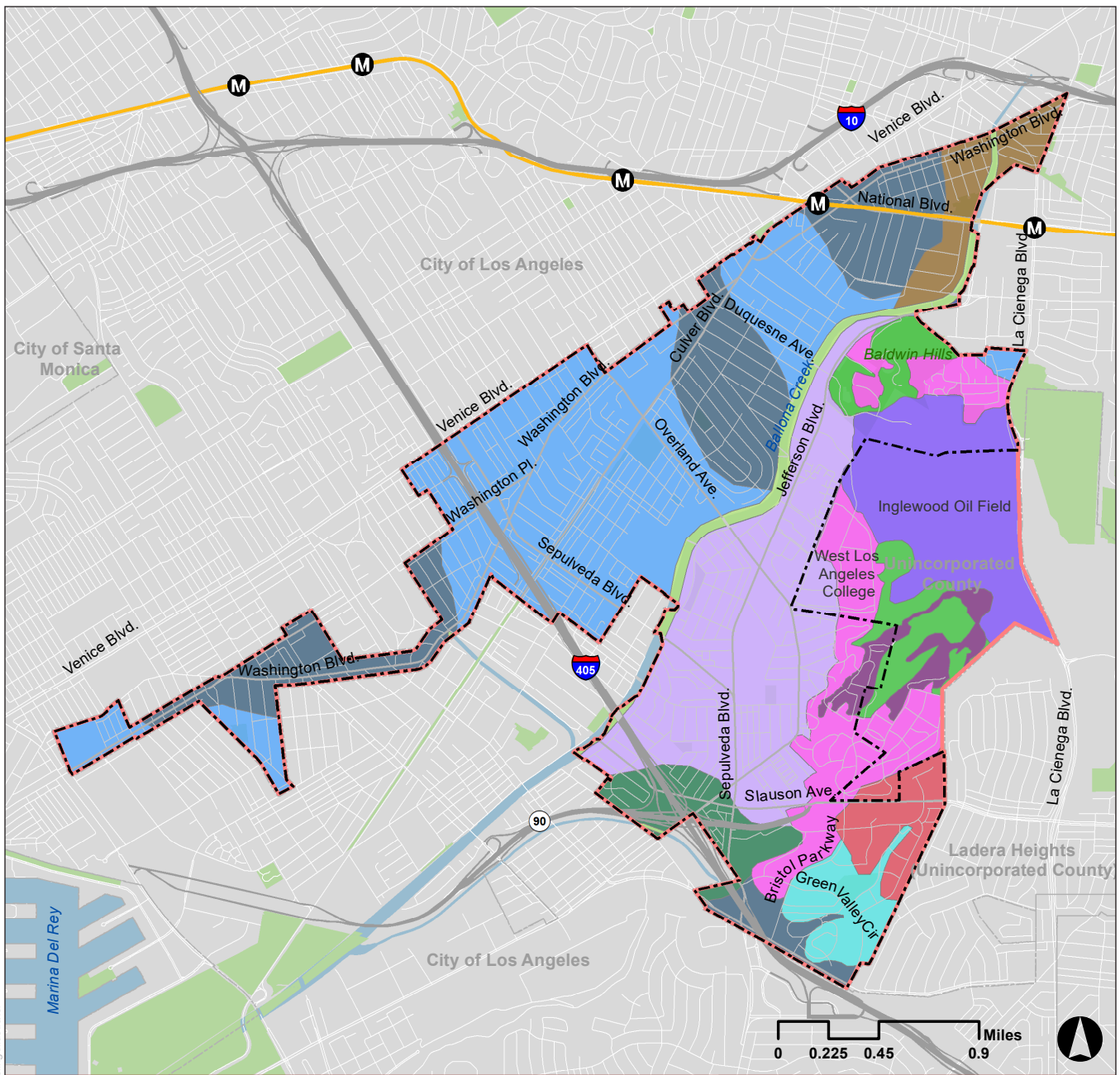
Subsidence and Differential Settlement

Subsidence is characterized as a sinking of ground surface relative to surrounding areas and can generally occur where deep soil deposits are present. Subsidence in areas of deep soil deposits is typically associated with groundwater withdrawal or other fluid withdrawal from the ground such as oil. Subsidence can result in ground cracks and damage to subsurface vaults, pipelines, and other improvements. According to the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), prepared in collaboration with Culver City Unified School District (CCUSD) and approved by the California Office of Emergency Services (CalOES) and Federal Emergency Management Agency (FEMA) in 2017, the Planning Area does not have any historical occurrences of land subsidence.²

Settlement is the lowering of the land-surface elevation as a result of loading (e.g., placing heavy loads, typically fill or structures), which often occurs with the development of a site. Settlement or differential (i.e., unequal) settlement could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Although settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause significant building damage over time.

¹ Culver City. 2017. IOF Specific Plan Project Draft Environmental Impact Report. Available at <https://www.culvercity.org/files/assets/public/documents/city-manager/inglewood-oil-field/environmental-review-process/toc091117.pdf>. Accessed March 2023.

² Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan.



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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> City Limits Sphere of Influence Metro Station E Line (Expo) Major Roads Local Roads Parks and Open Space Waterbody | <p>Soils</p> <ul style="list-style-type: none"> Cropley-Urban land complex, 0 to 5 percent slopes Longshore-Pachic Haploxerolls complex, 20 to 55 percent slopes Mined land, oil wells Urban land, frequently flooded, 0 to 5 percent slopes Urban land-Anthratic Xerorthents, loamy substratum-Grommet complex, 0 to 5 percent slopes Urban land-Aquic Xerorthents, graded-Pacheco, warm complex, 0 to 2 percent slopes | <ul style="list-style-type: none"> Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes Urban land-Biscailuz-Hueneme, drained complex, 0 to 2 percent slopes Urban land-Biscailuz-Pico complex, 0 to 2 percent slopes Urban land-Sepulveda-Longshore, graded complex, 3 to 12 percent slopes Urban land-Typic Xerorthents, terraced complex, 10 to 35 percent slopes Urban land-Typic Xerorthents, terraced-Windfetch complex, 2 to 9 percent slopes Urban land-Windfetch-Centinela complex, 0 to 5 percent slopes |
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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; CGS, 2021

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Figure 4.6-1
Soil Types within the Planning Area



Regional and Local Faulting

Seismic hazards occur when accumulated stress between portions of the earth's crust is released, resulting in the sudden ground movement perceived as an earthquake. Primary seismic hazards are the direct result of the release of this accumulated stress and are typically characterized as earthquake fault rupture (displacement of the ground surface at the earthquake site) and seismic shaking (the ground movement itself, which can cause damage a significant distance from the earthquake site). Earthquakes can also cause secondary seismic hazards, such as liquefaction and earthquake-induced landslides.

The Planning Area is located within Southern California, a tectonically active region with high seismic activity. **Figure 4.6-2, Regional Earthquake Faults**, shows the various regional faults located throughout the greater Los Angeles region, including those within the Planning Area. Seismic hazards relate to faults, which are areas where large sections of the earth's surface called tectonic plates move past each other. The deformation of the plates and the accumulated stress between them causes faults in a wider area than the precise boundary between plates. In California, the Pacific and North American plates are sliding horizontally past each other, creating what is known as a "strike-slip fault."³ The boundary between the two plates is known as the San Andres Fault, although the stress caused by this movement has created thousands of fault areas throughout the state. Most of California lies on the North American plate, although the coastal areas of Central and Southern California, including Culver City, sit on the Pacific Plate.

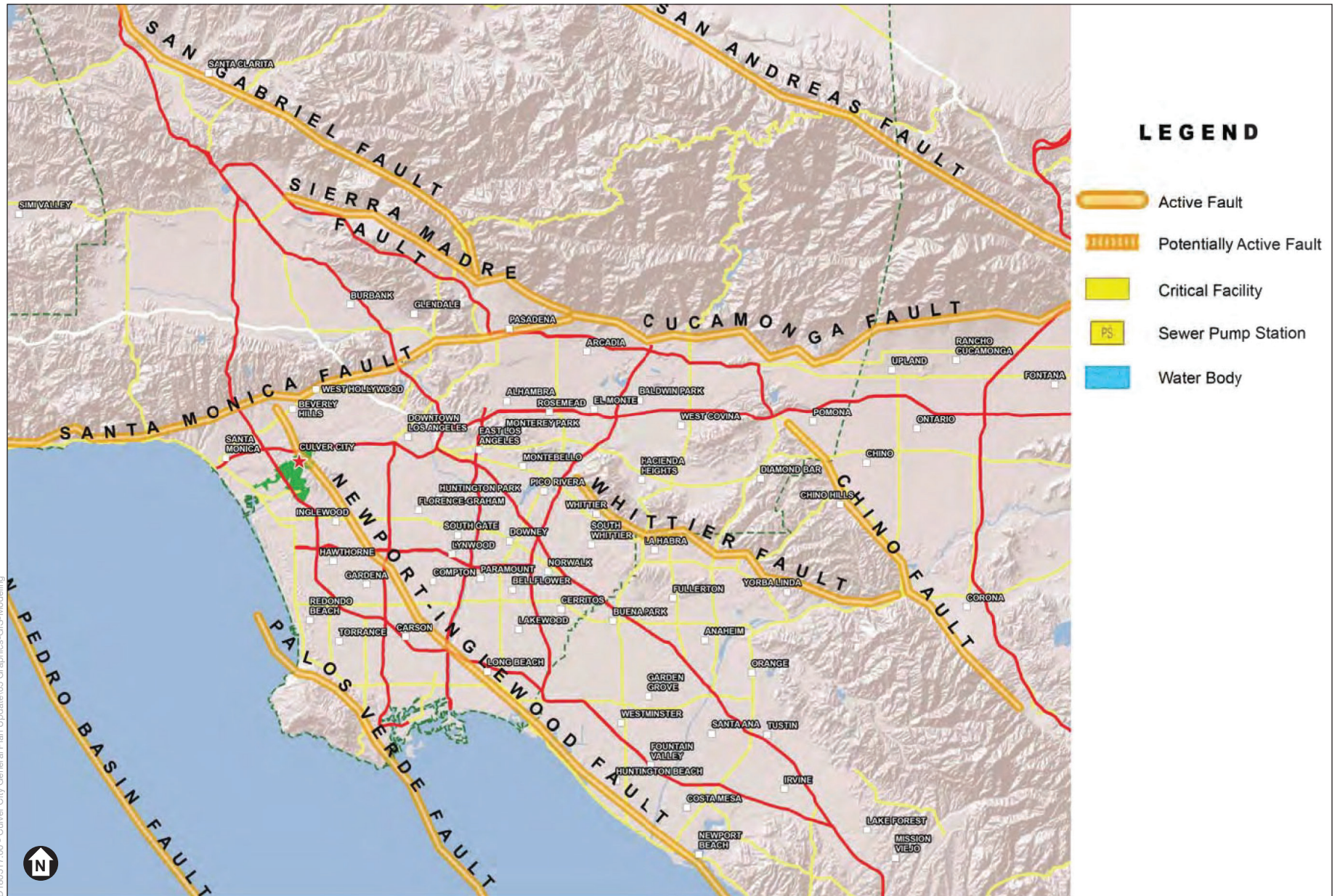
Locally, there are a number of faults in the vicinity of the Planning Area, which include the Overland Fault, Charnock Fault, Newport-Inglewood Fault, Palos Verdes Fault, Sierra Madre Fault, Whittier-Elsinore Fault, and the San Andrea Fault (see Figure 4.6-2). While the Overland Fault, Charnock Fault, and Newport-Inglewood Fault traverse the Planning Area, only the Newport-Inglewood Fault is capable of producing earthquakes that could cause significant ground shaking within the Planning Area.⁴ The local faults capable of producing earthquakes that could cause significant ground shaking within the Planning Area are described in greater detail below:

Newport-Inglewood Fault Zone. The Newport-Inglewood Fault Zone, a designated Alquist-Priolo fault, runs from the Santa Monica Mountains near Beverly Hills southeast to Newport Beach, passing through the northeastern portion of the Planning Area, including the Hayden Tract. The fault zone is made up of three distinct segments and several faults and fractures and is responsible for the topography of the Blair Hills and Baldwin Hills area and nearby Ladera Heights. The Newport-Inglewood Fault Zone caused the 1933 Long Beach earthquake, which was the last major event along this fault. The Southern California Earthquake Center estimates that a future major event along this fault could measure 6.0 to 7.4 on the moment magnitude scale.⁵ As a major fault passing through the city, it can cause surface rupture in the community.

³ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

⁴ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

⁵ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.



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SOURCE: City of Culver City, Information Technology Department, GIS; March 3, 2016

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Figure 4.6-2
Regional Earthquake Faults

Palos Verdes Fault Zone. The Palos Verdes Fault Zone extends from the Palos Verdes peninsula south out into the Pacific Ocean, running approximately 10 miles from the Planning Area at its closest point.⁶ This fault zone has not produced a significant earthquake in recorded history, although the last event is believed to have happened within the past 10,000 years. The Southern California Earthquake Data Center estimates that this fault can produce an earthquake measuring 6.0 to 7.0 or more on the moment magnitude scale. Due to its location, this fault zone is unlikely to result in fault surface rupture in the Planning Area, but it can produce earthquakes that could cause significant ground shaking in the Planning Area.

Sierra Madre Fault Zone. The Sierra Madre Fault Zone runs along the southern edge of the San Gabriel Mountains from La Canada-Flintridge to Claremont, approximately 16 miles from the Planning Area at its closest point.⁷ The last major event along the Sierra Madre Fault Zone is believed to have happened within the past 10,000 years, although no specific event is known. The Southern California Earthquake Data Center estimates that it can produce an event measuring 6.0 to 7.0 on the moment magnitude scale. Due to its location, this fault zone is unlikely to result in fault surface rupture in the Planning Area, but it can produce earthquakes that could cause significant ground shaking in the Planning Area.

Whittier-Elsinore Fault Zone. The Whittier-Elsinore Fault Zone runs from the Chino Hills region to the California-Mexico border and is approximately 22 miles from the Planning Area at its closest point.⁸ The last major event along this fault was a 1910 earthquake measuring an estimated 6.0 on the moment magnitude scale. This fault is believed to cause a major seismic event approximately 250 years ago with a probable magnitude of 6.5 to 7.5.⁹ Due to its location, this fault zone is unlikely to result in fault surface rupture in the Planning Area, but it can produce earthquakes that could cause significant ground shaking in the Planning Area.

San Andreas Fault Zone. The San Andreas Fault is the largest and most well-known of California's faults, which runs from Cape Mendocino to the Salton Sea. The fault is approximately 40 miles from the Planning Area at its closest point.¹⁰ It has caused numerous major earthquakes throughout California's history, including the 1906 San Francisco earthquake and the 1989 Loma Prieta earthquake. The central portion of the San Andreas Fault was responsible for an earthquake measuring an estimated 7.9 on the moment magnitude scale, the strongest in California's recorded history in 1857 near Parkfield (approximately 170 miles from the Culver City). The Southern California Earthquake Data Center estimates that a future major event along the southern part of the San Andreas Fault could measure 6.8 to 8.0 on the moment magnitude scale. Due to its location, this fault zone is unlikely to result in fault surface rupture in the Planning Area, but it can produce earthquakes that could cause significant ground shaking in the Planning Area.

⁶ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

⁷ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

⁸ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

⁹ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

¹⁰ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

A major earthquake along any of these faults could cause significant damage in the Planning Area. As detailed in the MJHMP, the list above is not a comprehensive list of all known faults capable of producing a significant earthquake near the city. There is a risk of earthquakes from faults that have not yet been discovered. For example, the 1994 Northridge earthquake caused more property damage than any other earthquake in the United States and was the ninth most damaging earthquake in history, occurred along a then-undiscovered fault.¹¹ The Northridge Earthquake measured 6.7 on the moment magnitude scale, had a Mercalli intensity of IX, killed 57 people, caused over 5,000 injuries, spawned multiple strong aftershocks, caused an estimated \$20 billion or more in damages, and caused extensive damage in Culver City.¹² The Interstate 10 overpasses at La Cienega Boulevard, Venice Boulevard, Fairfax Avenue, and Washington Boulevard, immediately north of the city, were significantly damaged and had to be rebuilt.

Alquist-Priolo Earthquake Fault Zones

The purpose of the Alquist-Priolo Earthquake Fault Zones Act is to prevent the construction of buildings used for human occupancy across the surface trace of active faults. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones [EFZs]) around the surface traces of active faults and to issue appropriate maps. The zones vary in width and average about one-quarter mile wide. For the purposes of the Act, an active fault is one that has ruptured in the last 11,000 years. As shown in **Figure 4.6-3, Alquist-Priolo Fault Zones within the Planning Area**, there are identified Alquist-Priolo fault zones associated with the Newport-Inglewood fault within the northeastern portion of the Planning Area, which runs through the Hayden Tract. As stated above, the Newport-Inglewood Fault Zone is a designated Alquist-Priolo Fault Zone, which extends from the Santa Monica Mountains to Newport Beach.

Seismic Hazards

As discussed above, Southern California is a seismically active region, where the Planning Area is located between two major, active faults: the Newport-Inglewood Fault to the east and northeast and the Palos Verdes Fault to the west and southwest. The predominant tectonic activity associated with these and other faults within the regional tectonic framework is right-lateral, strike-slip and/or reverse movement. Other potentially active fault zones in proximity to the Planning Area include the Sierra Madre Fault, Whittier-Elsinore Fault, and the San Andrea Fault. An earthquake event on one of the active or potentially active faults near the Planning Area could result in earthquake damage to structures caused by surface rupture, ground shaking, ground failure, land sliding and slope instability, and/or inundation from seiche or tsunami. The level of damage in the Planning Area resulting from an earthquake would depend upon the magnitude of the event, the epicenter distance from the Planning Area, the response of geologic materials, and the strength and construction quality of structures. Seismically induced water inundation is described in Section 4.9, *Hydrology and Water Quality*, of this Draft PEIR.

¹¹ Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

¹² Culver City and CCUSD. 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.



- City Limits
- Sphere of Influence
- M Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Alquist Priolo Fault
- Alquist Priolo Fault Zone



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; CGS, 2021

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Figure 4.6-3
Alquist-Priolo Fault Zones within the Planning Area



Ground Shaking

An earthquake of moderate to high magnitude generated within the region could cause significant ground shaking within the Planning Area. The exact degree of shaking experienced at a given location would depend on a host of site-specific factors, such as: the magnitude of the seismic event, the duration of the seismic event, the distance from a given site to the zone of rupture (i.e., hypocenter), local site-specific geologic conditions (i.e., nature, thickness, and extent of underlying soil and/or bedrock), and broader, often regional geologic factors such as basin geometry. In general, the severity of seismic ground shaking tends to abate with increasing distance from the event hypocenter. Seismic ground shaking, if sufficiently intense and sustained, can result in significant damage to, or catastrophic failure of buildings or other human-made structures.

Surface Fault Rupture

Surface fault rupture, or a break in the ground's surface and associated displacement caused by fault movement, is directly correlated to earthquake magnitude. Earthquakes having a magnitude of 5.5 or greater are generally required for surface fault rupture to occur. The Newport-Inglewood Fault is capable of causing surface fault rupture within the Planning Area, where the areas at risk are identified and mapped under the Alquist-Priolo Earthquake Fault Zones program, as shown in Figure 4.6-3.

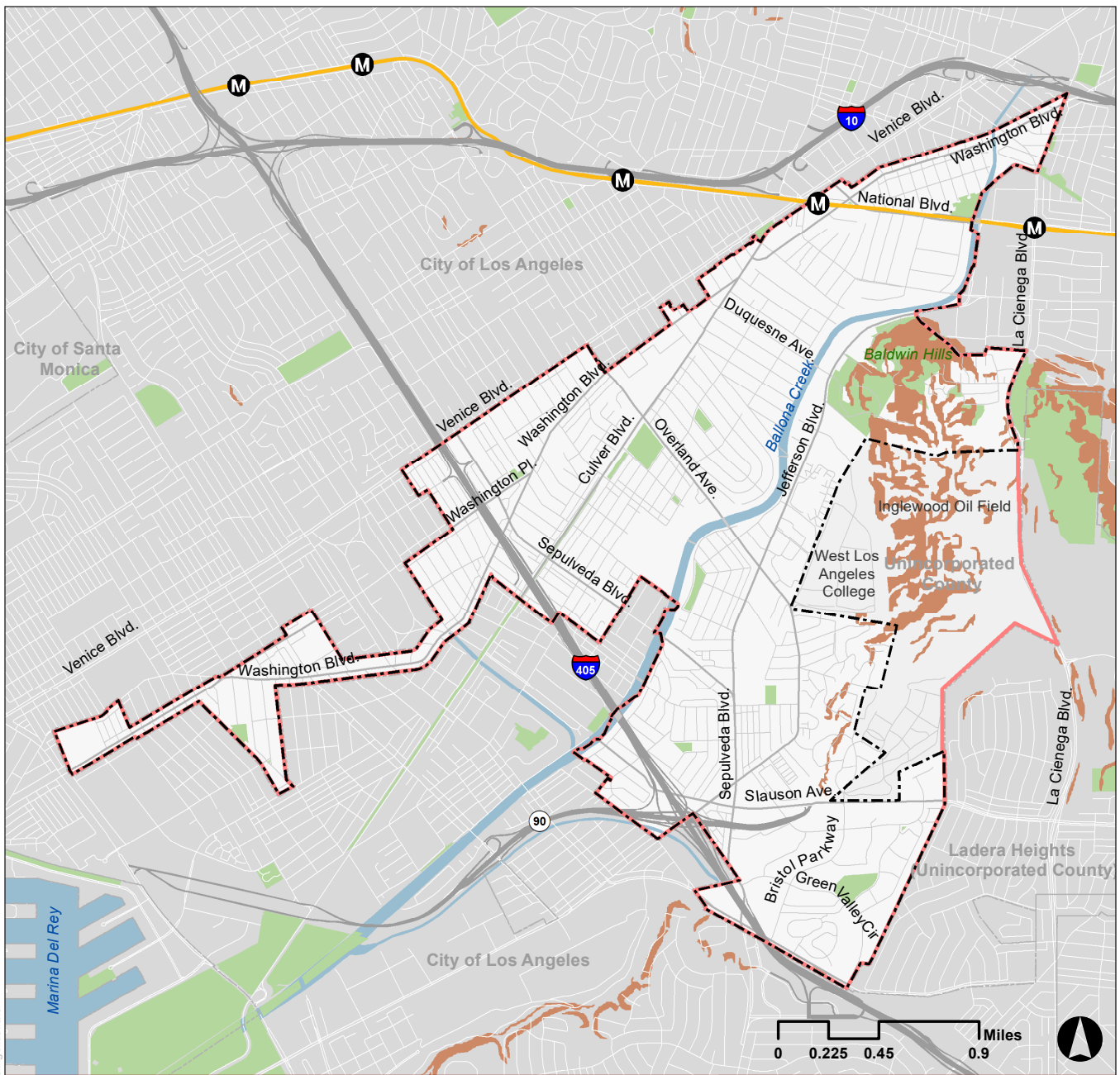
Ground Failure

Landslides and Slope Instability

Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (i.e., gravity) or dynamic (i.e., earthquake) forces. A slope failure is a mass of rock, soil, and debris displaced downslope by sliding, flowing, or falling. Exposed rock slopes undergo rockfalls, rockslides, or rock avalanches, while soil slopes experience shallow soil slides, rapid debris flows, and deep-seated rotational slides. Landslides may occur on slopes of 15 percent or less; however, the probability is greater on steeper slopes that exhibit historic landslide features such as scarps, slanted vegetation, and transverse ridges. Landslide-susceptible areas are characterized by steep slopes and downslope creep of surface materials. Debris flows consist of a loose mass of rocks and other granular material that, if saturated and present on a steep slope, can move downslope. The rate of rock and soil movement can vary from a slow creep over many years to a sudden mass movement.

Slope stability can depend on many complex variables. The geology, structure, and amount of groundwater in the slope affects slope failure potential, as do external processes (i.e., climate, topography, slope geometry, and human activity). Earthquake motions can induce significant horizontal and vertical dynamic stresses in slopes that can trigger failure. Earthquake-induced landslides can occur in areas with steep slopes that are susceptible to strong ground motion during an earthquake.

As shown in **Figure 4.6-4, Potential Landslide Zones within the Planning Area**, the eastern portion of the Planning Area, including the Baldwin Hills, Blair Hills, and Culver Crest neighborhoods are at an elevated landslide risk. Past landslides in part of the Planning Area have been comparatively small, although still potentially large enough to significantly damage or destroy buildings.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Potential Landslide Zone



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; CGS, 2019

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Figure 4.6-4
Potential Landslide Zones within the Planning Area



Subsidence/Liquefaction

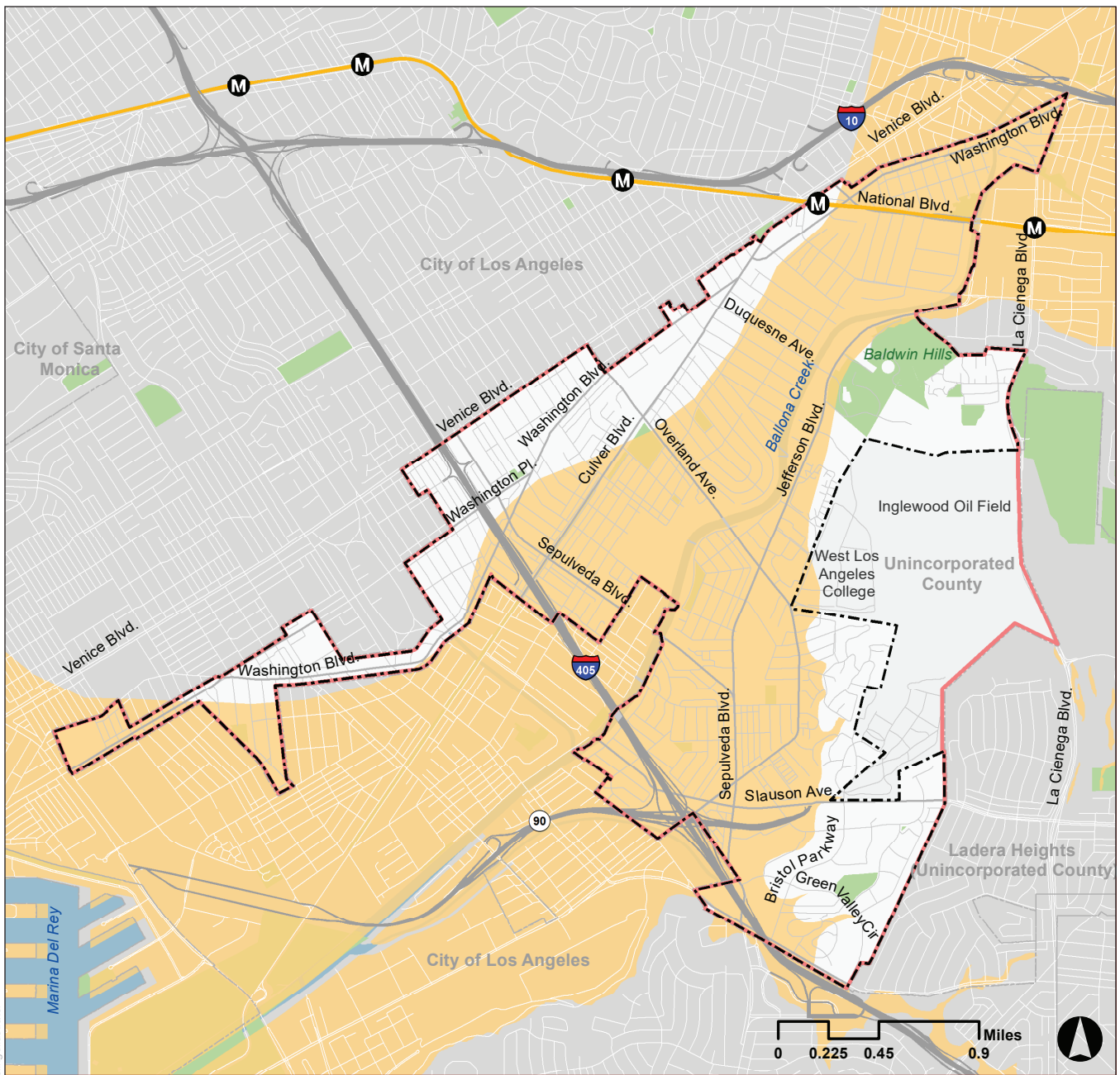
Liquefaction occurs when the force of an earthquake's shaking causes groundwater to mix with the soil. This mixture temporarily becomes fluid and loses its strength, which may in turn, cause buildings and other structures built on or in it to tilt, collapse, or otherwise suffer damage. Liquefaction can also occur independently of an earthquake if any other sudden and significant stress causes the mixing of groundwater and soil. The risk of liquefaction depends on many different factors, including the height of the groundwater table and the types of soil in an area. Most of the city is in an area of elevated liquefaction risk, as shown in **Figure 4.6-5, *Potential Liquefaction Zones in the Planning Area***. Only a small portion of the Sphere of Influence (SOI) within West Los Angeles College is within a potential liquefaction zone. While the likelihood of liquefaction occurring in a future seismic event is dependent on several factors, there is a possibility for widespread and damaging liquefaction in the community.

Lateral Spreading

Ground cracking, ground lurching and lateral spreading are secondary features resulting from strong to moderately strong ground shaking and may be associated with liquefaction. Ground cracking usually occurs in near-surface materials, reflecting differential compaction or liquefaction of underlying materials. The potential for ground cracking exists in those areas that have a moderate to high potential for liquefaction. Ground lurching results when soft, water-saturated surface soils are thrown into undulatory motion. Lateral spreading (a form of landslide) is referred to as limited displacement ground failure, often associated with liquefaction. Compact surface materials may slide on a liquefied or low shear strength layer at a shallow depth, moving laterally several feet down slopes of less than two degrees. Such a condition may be present where conditions conducive to shallow liquefaction exist. Therefore, areas near Ballona Creek, which are in the potential liquefaction zone, may also be subject to lateral spreading.

Paleontological Resources

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. As defined in this section, paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period and are greater than 5,000 years in age. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations or geologic units) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the fossil localities, and the geologic formations containing those localities.



- City Limits
- Sphere of Influence
- M Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Potential Liquefaction Zone



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; CGS, 2019

Culver City General Plan 2045

Figure 4.6-5
Potential Liquefaction Zones in the Planning Area



Natural History Museum of Los Angeles County Records Search, Geologic Map and Literature Review

Results of the archival research through the Natural History Museum of Los Angeles County (LACM) indicate that four known fossil localities have been previously identified within the city. In addition, eight other fossil localities (LACM 1159, 3366, 3367, 3368, 3369, 3370, 4232, and 4247) are located outside the city (either immediately adjacent or within several miles) but from the same sedimentary deposits (older Quaternary alluvium deposits and the San Pedro Sand) that occur within and throughout the city.¹³ The resources encountered in the city and within the vicinity include the remains of a mammoth, mastodon, camel, human, horses, saber-toothed cat, duck, and multiple invertebrates (clams, gastropods, etc.).¹⁴

The geologic map and literature review indicate that within the northern, southern, and western portions of the city, younger alluvium deposits (*Qa*) exist. Additionally, in the southern portion of the city, older alluvium (*Qoa*), Paleosol (*Qop*), artificial fill (*af*), and Sand Pedro Sand (*Qsp*) sediments are present. Lastly, landslide debris (*Qls*) and Inglewood Formation deposits (*Qi*) are also found within the northeastern portion of the city. In sum, the geologic map and literature review indicate the following:

- The northern, southern, and western portions of the city have a low to high potential for yielding fossil localities associated with younger alluvium. The deeper the excavations extend in these portions of the city which may reach into older alluvium deposits, the higher the chances are for encountering fossils.
- The northeastern portion of the city has a high potential for producing fossils associated with the Inglewood Formation and an undetermined potential for encountering landslide debris.
- The southern portion of the city has a high potential for yielding fossiliferous deposits associated with older alluvium and San Pedro Sand. Paleosol soils also exist within the southern portion of the city; however, the potential for finding fossils is undetermined. Lastly, artificial fill is also found within the southern portion of the city, but there is no potential for finding fossils since these are modern and disturbed soils.

Other Paleontological Resources Identified within the City

Other paleontological resources have been identified recently within the city that were discovered at depth during construction of private redevelopment projects. For example, in 2018, several paleontological specimens (e.g., gastropod and clam shells) were recovered during construction of a mixed-use project at depths of 25 to 41 feet below ground surface (bgs).¹⁵ In the same year at a separate private redevelopment project, approximately 100 specimens consisting of marine mammals (otariid, or seals; and cetacean, or whales or dolphins), terrestrial mammals (*Bison* sp.), invertebrate, and plant fossils, were encountered between 15 feet to 32

¹³ Mcleod, Samuel, 2019. Paleontological Resources for the Proposed Culver City General Plan Update Project, in Culver City, Los Angeles County, Project Area. Letter on file at ESA.

¹⁴ Mcleod, Samuel, 2019. Paleontological Resources for the Proposed Culver City General Plan Update Project, in Culver City, Los Angeles County, Project Area. Letter on file at ESA.

¹⁵ ESA, 2018. Archaeological and Paleontological Monitoring Report for the Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group.

feet bgs.¹⁶ Microvertebrate fossils were also identified through screening of sediments at this same property, and included amphibians, snakes, gophers, kangaroo rats, harvest mice, wood rats, voles, and rabbits.

During construction of another redevelopment project in the city, more than 20 fossilized bone specimens (including teeth, a patella, vertebrae, and miscellaneous long bones) and multiple invertebrates (e.g., clams, gastropods, etc.) were recovered between 20 to 55 feet bgs in undisturbed sediments. From this same property, a partial mandible (lower jawbone) of a saber-toothed cat (*Smilodon*) was also recovered from approximately 28 to 32 feet below the surface.¹⁷

4.6.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

United States Geological Survey Landslide Hazard Program

The United States Geological Survey (USGS) created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility. In Los Angeles County, plans and programs designed for the protection of life and property are coordinated by the Los Angeles County Office of Emergency Management.

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1977 to “reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program.” To accomplish this, the Act established the National Earthquake Hazards Reduction Program (NEHRP). NEHRP implementation activities are conducted primarily by FEMA. This program was substantially amended by the NEHRP Reauthorization Act of 2004 (Public Law 108-360).

NEHRP’s mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The NEHRP designates the National Institute of Standards and Technology (NIST) as the lead agency of the program. As lead agency, it develops, evaluates, and tests earthquake resistant design and construction practices for implementation in the building

¹⁶ ESA, 2021. Archaeological and Paleontological Monitoring Report for the 8777 Washington Project; Culver City, County of Los Angeles, California. Prepared for: CLPF-8777 Washington, L.P.

¹⁷ ESA, 2020. Progress Report - Archaeological and Paleontological Construction Monitoring Services for the Culver Studios Innovation Plan Project; Culver City, Los Angeles County, California. Prepared for The Culver Studios Owner, LLC.

codes and engineering practice. Under NEHRP, FEMA is responsible for developing earthquake risk reduction tools and promoting their implementation, as well as supporting the development of disaster-resistant building codes and standards. USGS monitors seismic activity, provides earthquake hazard assessments, and conducts and supports targeted research on earthquake causes and effects. Programs under NEHRP help inform and guide planning and building code requirements such as emergency evacuation responsibilities and seismic code standards.

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 (DMA2K) (Public Law 106-390) amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 to establish a Pre-Disaster Mitigation (PDM) program and new requirements for the federal post-disaster Hazard Mitigation Grant Program (HMGP). DMA2K encourages and rewards local and state pre-disaster planning. It promotes sustainability and seeks to integrate state and local planning with an overall goal of strengthening statewide hazard mitigation. This enhanced planning approach enables local, tribal, and state governments to identify specific strategies for reducing probable impacts of natural hazards such as floods, fire, and earthquakes. In order to be eligible for hazard mitigation funding after November 1, 2004, local governments are required to develop a Hazard Mitigation Plan that incorporates specific program elements of the DMA2K law.

Antiquities Act

Federal regulations regarding paleontological resources are generally applicable to a project if that project includes federally owned or federally managed lands or involves a federal agency license, permit, approval, or funding. The Antiquities Act of 1906 (54 U.S.C. 320301-320303 and 18 U.S.C. 1866(b)) requires protection of historic landmarks, historic and prehistoric structures, as well as other objects of historic or scientific interest on federally administered lands, the latter of which would include fossils. The Antiquities Act establishes a permit system for the disturbance of any object of antiquity on federal land and also sets criminal sanctions for violation of these requirements. In 1958, the Federal-Aid Highways Act of 1958 extended the Antiquities Act to specifically apply to paleontological resources.

Code of Federal Regulations, Title 40

Title 40: Protection of Environment is the section of the Code of Federal Regulations (CFR) that deals with the United States Environmental Protection Agency's (USEPA) mission of protecting human health and the environment. Title 40 Code of CFR Section 1508.2 identifies paleontological resources as a subset of scientific resources.

National Pollutant Discharge Elimination System Program

The National Pollutant Discharge Elimination System (NPDES) Program has been responsible for substantial improvements to our nation and state's water quality since 1972. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of Best Management Practices (BMPs).

NPDES permits are required by Section 402 of the Clean Water Act.¹⁸ See Section 4.9, *Hydrology and Water Quality*, for more information about the NPDES Program.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act) was signed into law December 22, 1972 (revised in 1994) and codified into State law in the California Public Resources Code (PRC) as Division 2, Chapter 7.5 to address hazards from earthquake fault zones. The primary purpose of this act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. This act was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. The act requires the State Geologist (California Geologic Survey) to delineate regulatory zones known as “earthquake fault zones” along faults that are “sufficiently active” and “well defined”, and to issue and distribute appropriate maps to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Pursuant to this act and as stipulated in Section 3603(a) of the California Code of Regulations, structures for human occupancy are not permitted to be placed across the trace of an active fault. The act also prohibits structures for human occupancy within 50 feet of the trace of an active fault, unless proven otherwise by an appropriate geotechnical investigation and report that the development site is not underlain by active branches of the active fault, as stipulated in Section 3603(a) of the California Code of Regulations. Furthermore, the act requires that cities and counties withhold development permits for sites within an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting, as stipulated in Section 3603(d) of the California Code of Regulations.

California Building Code

The California Building Code (CBC), which is codified in Title 24 of the California Code of Regulations, Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The 2022 edition of the CBC is based on the 2021 International Building Code (IBC) published by the International Code Council. The code is updated triennially, and the 2022 edition of the CBC

¹⁸ United States Environmental Protection Agency (USEPA), Clean Water Act, Section 402: National Pollutant Discharge Elimination System. Available at: <https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system>. Accessed March 2023.

was published by the California Building Standards Commission on July 1, 2022, and became effective January 1, 2023. Every three years, the State adopts new codes (known collectively as the California Building Standards Code) to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. Sections 17922, 17958, and 18941.5 of the California Health and Safety Code require that the latest edition of the California Building Standards Code apply to local construction 180 days after publication. The significant changes to Title 24 in the 2022 edition can be found at California Department of General Services website.¹⁹

All proposed structures are required to be designed and constructed in accordance with the 2022 edition of the CBC, as amended by the City of Culver City, and with other applicable laws and regulations. Specific relevant CBC requirements, in addition to designing and constructing buildings to code, include but are not limited to, the following:

- **CBC Section 1803 (Detailed Geotechnical Investigations):** CBC Section 1803 requires the preparation of a detailed geotechnical investigation, prepared to ASTM standards by a State licensed Geotechnical Engineer and using ASTM procedures, prior to design and construction. As required therein, the detailed geotechnical investigation must: (1) address fault rupture, seismic ground shaking, liquefaction, lateral spreading, settlement, subsidence, slope stability, and expansive and collapsible soils; and (2) include a literature review, subsurface testing (e.g., borings), laboratory testing of collected soils, analysis, and geotechnical engineering recommendations for project foundations, footings, and other construction and design elements. Per City requirements, the detailed geotechnical investigation must be submitted with the Site Improvement/Grading Plan. Compliance with the geotechnical engineering recommendations in a detailed geotechnical investigation would ensure that the site-specific geotechnical and soils hazards at a project site are taken into account during design and construction and properly mitigated.^{20,21}
- **CBC Section 1805.1.3 (Groundwater Control):** Where dewatering is required, CBC Section 1805.1.3 requires that the design of the system to lower the groundwater table shall be based on accepted principles of engineering that consider issues that include, but are not necessarily limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate, and the rated capacity of the disposal area for the system. Consideration of these issues would ensure that any dewatering systems are properly sized and designed to accommodate the dewatering required.
- **CBC Section 1304 (Excavation, Grading and Fill):** CBC Section 1304 identifies specific slope limitations, compaction requirements, placement of fill requirements, and other grading requirements for excavation, grading and fill. These requirements have been formulated to ensure the safe and proper support of new buildings/structures.

¹⁹ Department of General Services, 2022. Building Standards Commission, California Building Standards Code. Available at: <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo/>. Accessed March 2023.

²⁰ The geotechnical and soils issues listed are those required by CBC Section 1803.5.12 be addressed in detailed geotechnical reports for projects in USGS Seismic Design Categories D through F (e.g., areas subject to potentially strong seismic ground shaking).

²¹ The geotechnical investigation determined the Project Site is in Seismic Design Category D.

- **CBC Section J104.3 (Grading Permit Requirements – Geotechnical/Soils Report):** Per CBC Section J104.3, a geotechnical report prepared by a registered design professional shall be required for a grading permit. The report shall contain at least: (1) the nature and distribution of existing soils; (2) conclusions and recommendations for grading procedures; (3) soil design criteria for any structures or embankments required to accomplish the proposed grading; and (4) where necessary, slope stability studies, and recommendations and conclusions regarding site geology. Per City of Culver City requirements, a final compaction report is also required. Compliance with these requirements would ensure that grading occurs in a safe manner and would provide for the safe and proper support of new buildings/structures.
- **CBC Section J104.5 (Grading Permit Requirements – Liquefaction Study):** For sites with mapped maximum considered earthquake spectral response accelerations at short periods greater than 0.5g, a study of the liquefaction potential of the site shall be provided and the recommendations incorporated into the grading plan. Compliance with this requirement would ensure that any grading and other earthwork takes into account the potential for liquefaction at the site and, along with the design of foundations, footings, and other design elements, would mitigate potential liquefaction hazard.

California Environmental Quality Act

CEQA requires that public agencies identify the environmental consequences of their proposed projects and project approvals and as such, paleontological resources are afforded consideration under CEQA. Appendix G of the CEQA guidelines (Title 14, Division 6, Chapter 3, California Code of Regulations: 15000 et seq.) includes as one of the questions to be answered in the Environmental Checklist (Appendix G, Section V, Part c) the following: “Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Other State requirements for paleontological resource management are in PRC Chapter 1.7, Section 5097.5 through 5097.9 (Stats. 1965, c. 1136, p. 2792), Archaeological, Paleontological, and Historical Sites. This statute defines any unauthorized disturbance or removal of a fossil site or remains on public land as a misdemeanor and specifies that State agencies may undertake surveys, excavations, or other operations as necessary on State lands to preserve or record paleontological resources.

California Department of Transportation

Jurisdiction of the California Department of Transportation (Caltrans) includes State and interstate routes within California. Any work within the right-of-way of a federal or State transportation corridor is subject to Caltrans regulations governing allowable actions and modifications to the right-of-way. Caltrans standards incorporate the CBC and contain numerous rules and regulations to protect the public from seismic hazards such as surface fault rupture and ground shaking. In addition, Caltrans standards require that projects be constructed to minimize potential hazards associated with cut and fill operations, grading, slope instability, and expansive or corrosive soils, as described in the Caltrans Highway Design Manual.

California Multi-Hazard Mitigation Plan

The State of California Multi-Hazard Mitigation Plan, also known as the State Hazard Mitigation Plan (SHMP), was approved by FEMA in 2013 and most recently updated in 2018. The SHMP outlines present and planned activities to address natural hazards. The adoption of the SHMP qualifies the State of California for federal funds in the event of a disaster. The state is required under DMA2K, described above, to review and update its SHMP and resubmit for FEMA approval at least once every five (5) years to ensure the continued eligibility for federal funding. The SHMP provides goals and strategies which address minimization of risks associated with natural hazards and response to disaster situations. The SHMP notes that the primary sources of losses in the State of California are fire and flooding.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides the following: “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”

California Public Resources Code Section 5097.5 and Section 30244

Requirements for paleontological resource management are included in PRC Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts on paleontological resources from developments on public (state, county, city, district) lands.

Hospital Facilities Seismic Safety Act of 1973

The Alfred E. Alquist Hospital Facilities Seismic Safety Act (HSSA) was passed in 1973 to ensure that hospitals in California conform to high construction standards and are reasonably capable of providing services to the public after a disaster. The HSSA requires the establishment of rigorous seismic design regulations for hospital buildings and requires that new hospitals and additions to hospitals have the capacity, as far as is practical, to remain functional after a major earthquake. State law requires that all existing hospital buildings providing general acute care as licensed under provisions of Section 1250 of the California Health and Safety Code be in compliance with the intent of the HSSA by the year 2030.

National Pollutant Discharge Elimination System Construction General Permit

In California, the State Water Resources Control Board (SWRCB) and its Regional Water Quality Control Board (RWQCB) administer the National Pollution Discharge Elimination System (NPDES) program. In the Planning Area, the NPDES stormwater permitting program is implemented and enforced by the LARWQCB (Region 4). The NPDES permit system was established as part of the Federal Clean Water Act to regulate both point source discharges and non-point source discharges to surface water of the United States, including the discharge of soils eroded from construction sites.

The NPDES program consists of characterizing receiving water quality, identifying harmful constituents (including siltation), targeting potential sources of pollutants (including excavation and grading operations), and implementing a comprehensive stormwater management program. Construction and industrial activities typically are regulated under statewide general permits that are issued by the SWRCB. Additionally, the SWRCB issues Water Discharge Requirements that also serve as NPDES permits under the authority delegated to the RWQCBs, under the Clean Water Act. See Section 4.9, *Hydrology and Water Quality*, for more information about the NPDES.

Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate “seismic hazard zones.” Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plans and to encourage the adaptation of land use management policies and regulations to reduce and mitigate seismic hazards to protect public health and safety. Under PRC Section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a geotechnical report defining and delineating any seismic hazard.

Society of Vertebrate Paleontology Guidelines

The Society of Vertebrate Paleontology (SVP) has established standard guidelines that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation.²² Most practicing professional vertebrate paleontologists adhere closely to the SVP’s assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

Paleontological Resources Significance Criteria

As defined by the SVP, significant nonrenewable paleontological resources are:²³

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological

²² Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed March 2023.

²³ Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed March 2023.

resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

As defined by the SVP, significant fossiliferous deposits are:²⁴

A rock unit or formation which contains significant nonrenewable paleontological resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontological resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

Based on the significance definitions of the SVP, all identifiable vertebrate fossils are considered to have significant scientific value.²⁵ This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit known to contain significant fossils is considered “sensitive” to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case.²⁶

Fossils are contained within surficial sediments or bedrock and are therefore not observable or detectable unless exposed by erosion or human activity. In summary, paleontologists cannot know either the quality or quantity of fossils prior to natural erosion or human-caused exposure. As a result, even in the absence of surface fossils, it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be

²⁴ Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed March 2023.

²⁵ Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed March 2023.

²⁶ Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed March 2023.

favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken in order to prevent adverse impacts on these resources.

Regional

Los Angeles County General Plan

The Los Angeles County (County) General Plan governs the area within the SOI as it is within unincorporated Los Angeles County. The County's General Plan includes goals and policies to ensure future development is designed and constructed in accordance with the applicable building codes and engineering requirements that address geologic hazards.

Los Angeles County All-Hazard Mitigation Plan

The County's All-Hazard Mitigation Plan was prepared to assess risks posed by natural hazards and to develop a mitigation action plan for reducing the risks in unincorporated Los Angeles County. This plan provides the following policies to address seismic and geologic hazards, which would apply to unincorporated lands in the Planning Area:

Seismic Hazard

Policy S 1.3: Require developments to mitigate geologic hazards, such as soil instability and landslides, in hillside management areas through siting and development standards.

Policy S 1.4: Support the retrofitting of unreinforced masonry structures to help reduce the risk of structural and human loss due to seismic or geological hazards.

Los Angeles County Municipal Code

Title 26, Building Code, of the Los Angeles County Municipal Code (LACMC) contains the County's Building Code, which incorporates by reference the CBC, with County amendments for additional requirements. The County's Building and Safety Department is responsible for the enforcement of the County's Building Code. In regard to geologic hazards, the LACMC requires appropriate geotechnical investigation and reporting to determine and minimize site-specific risks of landslide, settlement, or slippage. In addition, the LACMC also enforces the setback and building requirements established in the Alquist-Priolo Act for new or redeveloped properties. The LACMC would apply to areas within the SOI.

Local

City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan

The City and CCUSD's MJHMP was approved by CalOES and FEMA on June 1, 2017 and was prepared to meet the requirements of these agencies and to allow the City and CCUSD to be eligible for funding and technical assistance from state and federal hazard mitigation programs in accordance with DMA2K (described under Federal Regulations). The MJHMP identifies resources, information, and strategies for risk reduction and provides a tool to measure the success of mitigation implementation on a continual basis. The strategies identified in the

MJHMP are developed to reduce risks from natural hazards through a set of defined mitigation actions; to establish a basis for coordination and collaboration among resource agencies and the public; and to assist in meeting the requirements of federal assistance programs. The MJHMP does not supersede current City and CCUSD plans and strategies, but rather it enhances the ability to identify, inform, and mitigate natural hazard risk. The MJHMP purpose is to help guide and coordinate mitigation activities and serve as a tool for decisionmakers to direct mitigation activities and resources within the Planning Area.

Culver City Municipal Code

Chapter 15.02, Buildings, Structures, and Equipment, of the Culver City Municipal Code (CCMC) contains the City's Building Code, which incorporates by reference the CBC, with City amendments for additional requirements. The Building Safety Division (BSD) is responsible for implementing the provisions of the City's Building Code. To that end, BSD issues building and grading permits for construction projects. Building permits are required for any building or structure that is erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted, or demolished. Grading permits are required for all grading projects other than those specifically exempted by the City's Building Code. BSD has the authority to withhold building permit issuance if a project cannot mitigate potential hazards to the project or which are associated with the project. Throughout the permitting, design, and construction phases of a building project, BSD engineers and inspectors confirm that the requirements of the City's Building Code pertaining specifically to geoseismic and soils conditions are being implemented by project architects, engineers, and contractors.

In addition, the City amended Chapter 15.02 of the CCMC on September 27, 2021, with the adoption of the Seismic Retrofit Ordinance. The purpose of the Seismic Retrofit Ordinance is to reduce the risk of death or injury that may result from seismic activity on existing wood-framed multi-story buildings with soft, weak, or open-front walls by requiring structure-specific measures to improve structural integrity to withstand seismic activity. The City has established Priority Designations, which categorizes eligible structures based on size, height, and/or number of units to be retrofitted, as well as a timeline for compliance with the ordinance. Redevelopment within the City would be required to comply with the Seismic Retrofit Ordinance.

By adoption of the CBC into the CCMC, the City requires a detailed Final Geotechnical Report with final design recommendations prepared by a California-registered geotechnical engineer and submitted to the BSD for review prior to issuance of a grading permit.²⁷ Final foundation design recommendations must be developed during final project design, and other deep foundation systems that may be suitable would be addressed in the detailed Final Geotechnical Report. All earthwork (e.g., excavation, site preparation, any fill backfill placement) must be conducted with engineering control under observation and testing by the geotechnical engineer and in accordance with CBC.

²⁷ California Building Code. 2019. Part 2, Volume 1, Chapter 18, Soils and Foundations, Section 1803, Geotechnical Investigations.

4.6.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to geology and soils if the project would:

- Threshold GEO-1:** 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;
 - ii. Strong seismic ground shaking;
 - iii. Seismic-related ground failure, including liquefaction;
 - iv. Landslides.
- Threshold GEO-2:** Result in substantial soil erosion or the loss of topsoil.
- Threshold GEO-3:** Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- Threshold GEO-4:** 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.
- Threshold GEO-5:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Threshold GEO-6:** Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The Initial Study (Appendix A) found no potentially significant impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems (Threshold GEO-6); therefore, this issue is not studied further in this PEIR.

Methodology

Geologic and Seismic Hazards

This evaluation of geologic and seismic hazard conditions within the Planning Area that would apply to the Project was completed using published geologic, soils, and seismic maps and studies from USGS, CGS, and Los Angeles County, as well as information from the MJHMP and the Inglewood Oil Field Specific Plan Project Environmental Impact Report (SCH No. 2015101030).

Paleontological Resources

The analysis of paleontological resources is based on a review of the results from the LACM paleontological records search conducted for the Culver City General Plan Update Environmental Background Report Existing Conditions Report. The purpose of the records search is to determine whether there are previously recorded fossil localities or paleontologically sensitive formations within the Planning Area that require inclusion in the current analysis. The results also provide a basis for assessing the sensitivity of the Planning Area in regard to the potential for surface and subsurface paleontological resources to exist.

Project Impact Analysis

Risk of Geologic Hazards

Threshold GEO-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides.

Impact Statement GEO-1: The Project would accommodate growth and development within areas potentially subject to surface rupture within an Alquist-Priolo fault zone, strong seismic shaking, seismic-related ground failure and landslides. However, implementation of the Project would include goals and policies that require adherence to all applicable laws, regulations, and standards related to seismic hazards and would require site-specific geotechnical investigations to address localized geologic hazards. Therefore, impacts would be less than significant.

General Plan 2045

Fault Rupture

As discussed above in Section 4.6.2, *Environmental Setting*, and mapped in Figure 4.6-3, the Newport-Inglewood Fault and the corresponding Alquist-Priolo Earthquake Fault Zones run through the northeastern part of the Planning Area, including the Hayden Tract. There are no other known faults that traverse the Planning Area that have the potential to result in surface fault rupture. As shown in Figure 2-6, Draft General Plan Land Use Map, in Chapter 2, *Project Description*, of this Draft PEIR, the majority of the potential growth under the Project would occur outside of the designated Alquist-Priolo Earthquake Fault Zones within the Planning Area. Existing land uses within the Alquist-Priolo Earthquake Fault Zones are developed with urban uses, including low- and medium-density residential, commercial, industrial, and open space uses. While the Project would change some of the land use designations in the Alquist-Priolo Earthquake Fault Zones, the uses would still be urban in nature and therefore, the Project would have the potential to expose people, structures, and infrastructure within these zones to the effects of surface fault rupture in the event of a large earthquake.

In accordance with the Alquist-Priolo Act, future development proposed within the identified Alquist-Priolo earthquake fault zones would be required to conduct site-specific geological

investigations to demonstrate the development would not be threatened by surface displacement from future faulting prior to issuance of building permits and/or approval of the project. For proposed structures intended for human occupancy within the Alquist-Priolo earthquake fault zones, in addition to the site-specific geological investigations, must also be located at least 50 feet from the trace of an active fault, unless proven otherwise by the geotechnical investigation and report that the development site is not underlain by active branches of the active fault. Compliance with the requirements of the Alquist-Priolo Act, including appropriate siting, and implementation of industry design and construction standards, would ensure that the risks of fault rupture would be minimized for future development within the Alquist-Priolo earthquake fault zones.

In addition to compliance with the Alquist-Priolo Act, compliance with the CBC, LACMC, and CCMC's engineering design and construction requirements and standards would reduce the risk of potential structural damage and exposure of people to risk of injury or death from structural failure. In accordance with the CBC, LACMC, and CMCC, foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking and surface fault rupture. Chapter 15.02 of the CMCC incorporates the most recent CBC. The Culver City Building and Safety Division reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Chapter 15.08 (California Building Standards Code) and imposes requirements for revisions where needed to ensure that new or significantly remodeled structures are constructed in compliance with the CBC, and reflect any additional measures deemed appropriate. Building permit issuance would be based upon satisfactory completion of any identified applicable measures at the time of issuance.

Furthermore, the General Plan 2045 includes goals and policies to minimize structural damage and to promote public safety by reducing exposure of people to risk of injury or death from structural failure during a large seismic event. The Safety Element includes proposed Goal S-4 and Policies S-4.1 through S-4.11 that focus on addressing seismic hazards by focusing on strengthening the City's project permit and review process and promoting the retrofitting and rehabilitation of utilities, infrastructure, and structures to increase public safety in the event of a seismic event. Specific to fault rupture, the Safety Element would establish policies for future development within the Newport-Inglewood Fault Zone and within Alquist-Priolo Zones, require earthquake-safe design and construction standards and measures, and ensure enforcement of the City's seismic code within the City and the SOI once annexed. Furthermore, the General Plan 2045's goals and policies require compliance with federal, state, and local regulations and design standards to address seismic hazards, including surface fault rupture.

With the implementation of the goals and policies in the General Plan 2045 as well as compliance with the CBC, CCMC, and LACMC, potential impacts associated with surface fault rupture within the Planning Area, including the Alquist-Priolo Earthquake Fault Zones, would be considered less than significant.

Ground Shaking

Earthquakes in and near the Planning Area have the potential to cause ground shaking of significant magnitude. The Project would allow for additional development within the Planning

Area, which could expose people and property to strong seismic ground shaking. However, as discussed in greater detail under *Fault Rupture* above, all future development under the Project would be required to be designed and constructed in compliance with the requirements and standards of the CBC and CCMC to resist the effects of accelerated ground motions due to an earthquake event. Compliance with the engineering design and construction requirements and standards of the CBC, CMCC, and LACMC would reduce the risks of structural failure due to strong ground shaking. Furthermore, the Culver City Building and Safety Division would review future development projects on an individual basis to ensure compliance with all applicable engineering and environmental requirements prior to issuance of a building permit, which would further minimize the risk of structural failure due to strong ground shaking.

Additionally, Goal S-4 and Policies S-4.1 through S-4.11 in the General Plan 2045 address any potential impacts associated with strong seismic ground shaking. As indicated above, the Safety Element includes various goals and policies that address seismic hazards by focusing on strengthening the City's project permit and review process and promoting the retrofitting and rehabilitation of utilities, infrastructure, and structures to increase public safety in the event of a seismic event. Specific to strong ground shaking, the Safety Element would establish policies to improve the enforcement of the City's seismic code, conduct a seismic vulnerability inventory across the Planning Area, and to monitor future development and redevelopment within the Newport-Inglewood Fault Zone and Alquist-Priolo Zones. Furthermore, the General Plan 2045's goals and policies require compliance with federal, state, and local regulations and design standards to address seismic hazards, including strong ground shaking. Therefore, impacts related to strong seismic ground shaking would be considered less than significant.

Seismic-Related Ground Failure, including Liquefaction

Secondary effects of earthquake shaking may include landslides, slope instability, liquefaction, subsidence, and lateral spreading. Seismic-induced landslides and slope instability are discussed below under *Seismically Induced Landslides*. As shown on Figure 4.6-5, the majority of the Planning Area is located within a liquefaction hazard area, with the exception of the northwestern and southeastern areas. As such, future development under the Project could potentially be exposed to the effects of liquefaction, subsidence, and lateral spreading from local and regional earthquakes.

As discussed above in *Fault Rupture* and *Strong Ground Shaking* above, compliance with the CBC and CCMC as well as with the goals and policies of the General Plan 2045, which aim to protect residents, employees, structures, and infrastructure within the City and the SOI once annexed from the effects of surface fault rupture and strong seismic ground shaking, would also protect against the secondary effects of earthquake shaking. All future development would be required to be designed, engineered, and constructed in accordance with the requirements and standards of the CBC, CMCC, and LACMC, which require that foundations and other structural support features be designed to resist or absorb damaging forces from strong ground shaking, liquefaction, and subsidence. Moreover, in accordance with the CBC, LACMC, and CCMC, for all proposed future development within an identified liquefaction area, a site-specific geotechnical investigation and report that includes design and engineering requirements to reduce the risks of liquefaction would be required. The geotechnical investigation and report would be required

to be submitted as part of the environmental and building permit process for future development projects.

In addition, General Plan 2045 includes goals and policies to address any potential impacts associated with strong seismic ground shaking (Goal S-4, Policies S-4.1 through S-4.12). The Safety Element includes various goals and policies that address seismic hazards by focusing on strengthening the City's project permit and review process and promoting the retrofitting and rehabilitation of utilities, infrastructure, and structures to increase public safety in the event of a seismic event. Specific to ground failure, including liquefaction, the Safety Element includes policies for the following to occur for new development in the liquefaction vulnerability zone: conduct liquefaction vulnerability studies with site-specific recommendations that address liquefaction, when warranted (Policy S-4.12); prepare site-specific geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path (Policies S-5.2 and S-5.4); and ensure enforcement of the City's seismic and building codes to minimize risks of ground failure, including liquefaction (Policy S-5.3). Furthermore, the General Plan 2045's goals and policies require compliance with federal, state, and local regulations and design standards to address seismic hazards, including seismic-related ground failure, including liquefaction.

Lastly, future development projects located within areas susceptible to seismic-related ground failure would be required by the CCMC to conduct an environmental analysis at the time a specific project is defined, including preparation of site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction. Thus, compliance with the CBC and CMCC, the goal and policies of the General Plan 2045, and site-specific recommendations identified during review, as necessary, would ensure impacts related to seismic-related ground failure, including liquefaction, would be considered less than significant.

Seismically Induced Landslides

Rapid erosion and landslides are most likely to occur on sloped areas. As described above in Section 4.6.2, *Environmental Setting*, the Planning Area is relatively flat with areas of rolling hills that vary in elevation from approximately 40 to 100 feet amsl, with the highest area being Baldwin Hills at 400 amsl. As shown in Figure 4.6-4, the eastern portion of the Planning Area around Baldwin Hills is designated as a potential landslide zone. As such, future development under the Project within the designated landslide area could potentially expose people, structures, and infrastructure within these areas to the effects of landslides and/or slope instability in the event of a large earthquake.

The General Plan 2045 includes Goal S-5 and Policies S-5.1 through S-5.6 to minimize slope instability and to promote public safety by reducing exposure of people to risk of injury or death from landslides during a large seismic event. The Safety Element includes various goals and policies, as listed below, that address seismic hazards by focusing on strengthening the City's project permit and review process and promoting the retrofitting and rehabilitation of utilities, infrastructure, and structures to increase public safety in the event of a seismic event. Specific to seismically induced landslides, the Safety Element includes policies that require the City to

monitor development in areas with high landslide potential; require site stability measures through enforcement of the City's Hillside Grading and Permitting Ordinance and other regulations; require site-specific geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path; and vegetation management to reduce the potential for landslides. Furthermore, the General Plan 2045's goals and policies require compliance with federal, state, and local regulations and design standards to address seismic hazards, including landslides and slope instability.

In addition to the General Plan 2045's goals and policies, compliance with the CBC, CCMC and LACMC engineering design and construction requirements and standards would reduce the risk of potential structural damage and exposure of people to risk of injury or death from landslides and slope instability. The potential impacts from landslides on future development associated with the Project would be addressed through site-specific geotechnical studies prepared in accordance with CBC and CMCC requirements and standard industry practices, as needed, which would specifically address landslide hazards. In addition, the CMCC includes various requirements for properties that contain slopes of 15 percent or more, including but not limited to preparation of a site-specific Slope Protection and Fire Prevention Landscape Plan and geotechnical and geologic report with detailed topographic survey, incorporation of slope stabilization measures approved by the Culver City Building and Safety Division, and submittal of a hillside grading plan to obtain a grading permit for sloped areas reviewed and issued by the Culver City Building and Safety Division. Furthermore, Chapter 1613.6 of the CMCC contains the seismic design provisions for hillside buildings to ensure slope stability. Therefore, compliance with the CBC and CMCC, the goal and policies of the General Plan 2045, and site-specific recommendations identified prior to permit approval would ensure impacts related to seismically-induced landslides and slope instability would be considered less than significant.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan within the city. Future development under the Zoning Code Update would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC within the CMC, Zoning Code, and General Plan 2045. Therefore, future development under the Project would not cause risk of loss, injury, or death associated with seismic hazards, including fault rupture, strong ground shaking, seismic-related ground failure, including liquefaction, or seismic-related landslides and slope instability. As such, implementation of the Project would result in a less than significant impact related to risk of seismic-related geologic hazards.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-4 Seismic hazards. Culver City residents and businesses are prepared for earthquake hazards, minimizing the economic impact of strong ground shaking, liquefaction, and fault rupture on public and private property.

S-4.1: Retrofitting and rehabilitation. Promote strengthening planned utilities (where feasible) and retrofitting and rehabilitating existing potentially hazardous structures and

aging lifeline utilities to increase public safety and minimize potential damage from seismic and geologic hazards and inadequate maintenance.

S-4.2: Project permit and review process. Strengthen the project permit and review process to ensure that proper actions are taken to mitigate potential adverse effects of seismic hazards. Consider structural and nonstructural seismic design and construction practices that minimize earthquake damage to critical facilities and structures designed for human occupancy.

S-4.3: Geological and geotechnical investigations. Continue to require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

S-4.4: Development or redevelopment within the Newport-Inglewood Fault Zone. Monitor development or redevelopment within the Newport-Inglewood Fault Zone in accordance with State law.

S-4.5: Newport-Inglewood Fault Zone cooperation. Cooperate with State and federal agencies in investigating the Newport-Inglewood Fault Zone geology. The City shall consider partnering with the U.S. Geological Survey's Earthquake Hazards Program to better identify the active traces of the Newport-Inglewood Fault.

S-4.6: Alquist-Priolo hazard zone collaboration. Collaborate with the U.S. Geological Survey regarding compliance with regulations applicable to areas within the Alquist-Priolo hazard zone.

S-4.7: Earthquake-safe design. Ensure that new structures are designed to, and existing structures perform such that they, minimize risk associated with earthquake hazards.

S-4.8: Seismic code enforcement. Continue enforcing the California Building Standards Code's Seismic Design Category provisions, including those related to near-source seismic conditions.

S-4.9: Seismic vulnerability inventory. Continue maintaining an inventory of private buildings vulnerable to seismic activity, including unreinforced masonry and soft story structures. Prioritize retrofitting more vulnerable structures.

S-4.10: Seismic retrofit funding. Continue to identify potential funding sources to assist with seismic retrofits.

S-4.11: Agency cooperation. Cooperate with other agencies, like the California Earthquake Authority Earthquake Brace + Bolt program, and private interests to implement incentive programs and educate private landowners on foundation bolting and bracing.

S-4.12: Liquefaction vulnerability. Require new development in the liquefaction vulnerability zone to conduct liquefaction vulnerability studies with mitigation measures that addresses liquefaction, when warranted, for geological reports that the City requires emphasis on lower-income families.

Goal S-5 Geologic hazards. The Blair Hills and Culver Crest neighborhoods are protected from the social and economic effects of geologic hazards associated with unstable slopes.

S-5.1: Development in areas with high landslide potential. Continue ensuring required compliance with State regulations during development and redevelopment within areas with high landslide potential during environmental and development review processes.

S-5.2: Site stability. Continue to require the following, when determined necessary, through standard City requirements, the Hillside Grading and Permitting Ordinance, the California Environmental Quality Act (CEQA), and other regulations:

- Preliminary geotechnical and geologic investigations in areas with high landslide potential;
- Evaluation of site stability and possible impact on adjacent properties, before final project design is approved; and
- Preparation of reports, investigations, and design recommendations for grading permits, building permits, and subdivision applications by a State-geotechnical engineer and State-certified engineering geologist.

S-5.3: Building safety. Continue to require the following, when determined necessary through City requirements, CEQA, and other regulations:

- Meeting the California Building Standards Code and Hillside Grading and Permitting Ordinance adopted by Culver City, coordinating between the project civil engineer, engineering geologist, and geotechnical engineer during grading and construction operations; and
- Certifying that building sites are stable to potential adverse effects of rain, earthquakes, and differential settlement before issuing building permits.

S-5.4: Geotechnical site investigations. Require geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path. Establish standards to improve setbacks or surface/subsurface drainage, construct buttresses or other retaining structures, or reconstruct slopes, that will minimize future risk to persons and property or public liability.

S-5.5: Geologic hazard management. Whenever possible, mitigate geologic hazards in a manner that preserves the aesthetic or natural conditions of hillside areas through minimal grading, or corrective landform grading and revegetation with appropriate plant materials. When these goals conflict, protecting life and property shall take precedence.

S-5.6: Vegetation management. Reduce the potential for landslides by sufficiently removing dead, woody vegetation after a catastrophic fire.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to seismic-related geologic hazards.

Soil Erosion or Loss of Topsoil

Threshold GEO-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would result in substantial soil erosion or the loss of topsoil.

Impact Statement GEO-2: The Project would not result in substantial soil erosion or the loss of topsoil. Therefore, impacts related to soil erosion or loss of topsoil would be less than significant.

General Plan 2045

Development anticipated as a result of implementation of the General Plan 2045 would likely include earthwork activities, such as grading, excavation, stockpiling, and paving, that could expose soils to the effects of erosion or loss of topsoil. Once disturbed, either through removal of vegetation, asphalt, or an entire structure, stockpiled soils can be exposed to the effects of wind and water if not managed properly. Construction activities that disturb one or more acre of land surface are subject to the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit compliance includes implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. A SWPPP must also describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion BMPs, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after a storm is also required to identify stormwater discharge from construction activity and to identify and implement erosion controls, where necessary. The BMPs implemented by a site-specific SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced.

Additionally, the General Plan 2045 includes goals and policies, listed below, that require the use of best management practices (BMPs) to control soil erosion during and after ground-disturbing activities and geotechnical reports for projects requiring grading permits (Policies S-4.3, S-5.5, S-5.6, S-7.10, and LU-12.2). Therefore, impacts related to soil erosion and topsoil loss would be considered less than significant with implementation of the Project.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan 2045 within the city. Future development under the Zoning Code Update would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC within the CMC, Zoning Ordinance, and General Plan 2045. In addition, future projects would also comply with requirements related to erosion and loss of topsoil of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, City's Grading Ordinance, CCMC, and the General Plan 2045. Therefore, future development under the Project would not cause soil erosion or loss of topsoil. As such,

implementation of the Project would result in a less than significant impact related to soil erosion or loss of topsoil.

Applicable Proposed General Plan Goals and Policies

Safety Element

S-4.3: Geological and geotechnical investigations. Continue to require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

S-5.4: Geotechnical site investigations. Require geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path. Establish standards to improve setbacks or surface/subsurface drainage, construct buttresses or other retaining structures, or reconstruct slopes, that will minimize future risk to persons and property or public liability.

S-5.5: Geologic hazard management. Whenever possible, mitigate geologic hazards in a manner that preserves the aesthetic or natural conditions of hillside areas through minimal grading, or corrective landform grading and revegetation with appropriate plant materials. When these goals conflict, protecting life and property shall take precedence.

S-5.6: Vegetation management. Reduce the potential for landslides by sufficiently removing dead, woody vegetation after a catastrophic fire.

S-7.10: Fire-safe landscapes. Encourage residents to plant and maintain drought-resistant, fire-retardant landscape species on slopes to reduce the risk of brush fire and soil erosion in areas adjacent to canyons. Develop stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential.

Land Use and Community Design Element

LU-12.2: Hillside safety measures. Incorporate additional safety measures for grading design into the Municipal Code/ Building Code, including

- Adopting a cumulative grading maximum;
- Incorporating additional safety measures for grading design into the Municipal Code/ Building Code; and
- Establishing criterion for appropriate and adequate protective devices; and
- Employing the use of landscaping as a method of erosion control.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to soil erosion or loss of topsoil.

Unstable Soils

Threshold GEO-3: The Project would have a significant impact implementation of the General Plan 2045 and Zoning Code Update resulted in geologic units or soils that are unstable as a result of

development, and potentially results in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact Statement GEO-3: While some future development under the Project could be located on a geologic unit or soil that is unstable or could become unstable, consistency with all applicable geotechnical and engineering regulations in the CBC and CMCC as well as with the goals and policies of the General Plan 2045 would minimize risks associated with on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable soils would be considered less than significant.

General Plan 2045

As discussed above under Thresholds GEO-1 and GEO-2, certain geologic units present in the Planning Area have the potential for landslides, slope instability, liquefaction, and liquefaction-induced lateral spreading. Development allowed under the Project could be located on geologic units or soils that are unstable, or that could become unstable, and result in geologic hazards if not addressed appropriately. Areas with underlying materials that include undocumented fills, soft compressible deposits, or loose debris could be inadequate to support development, especially multi-story buildings. Soils that exhibit expansive properties when exposed to varying moisture content over time could result in damage to foundations, walls, or other improvements. Future structures developed under the Project could be damaged as a result of settlement or differential settlement where structures are underlain by materials of varying engineering characteristics. In addition, construction of new structures in the vicinity of relatively steep slopes could provide additional loading causing landslides or slope failure from unstable soils or geologic units. Slope failure can occur naturally through rainfall or seismic activity, or through earthwork and grading related activities. However, the risk of landslides and slope instability would be limited to the western portion of the Planning Area around Baldwin Hills, as shown in Figure 4.6-4.

The potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the planning and design process for future development to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements that are used to minimize the risk associated with these hazards. Geotechnical investigations would be required for compliance with the CBC to thoroughly evaluate site-specific geotechnical characteristics of subsurface soils and bedrock to assess potential hazards and recommend site preparation and design measures to address any hazards which may be present. These measures are enforced through compliance with the CBC to address hazards relating to unstable soils and slope failure. In addition, CCMC and LACMC also include local design, engineering, and construction requirements specific to unstable geologic units and soils as well as for properties with slopes of 15 percent or greater. Compliance with these standards and requirements would reduce risks of landslides, lateral spreading, subsidence, liquefaction, or collapse associated with unstable geologic units or soils.

In addition, the General Plan 2045 includes goals and policies that address the risk of landslides, lateral spreading, subsidence, liquefaction, or collapse associated with unstable geologic units or

soils. Goal S-4 and the related policies of the Safety Element would address seismic hazards by focusing on strengthening the City's project permit and review process and promoting the retrofitting and rehabilitation of utilities, infrastructure, and structures to increase public safety in the event of a seismic event. Specific to unstable soils, Goal S-5 and Policies S-5.1 through S-5.6 of the Safety Element require the City to monitor development in areas with high landslide potential; require site stability through the City's Hillside Grading and Permitting Ordinance and other regulations; require site-specific geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path; vegetation management to reduce the potential for landslides; and requires the preparation of liquefaction vulnerability studies for new development proposed in the liquefaction vulnerability zone to address liquefaction, when warranted. For these reasons, impacts related to hazards associated with unstable soils, such as landslide, lateral spreading, subsidence, liquefaction, or collapse, would be considered less than significant.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan Land Use Designations within the city. Future development under the Zoning Code Update would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC within the CMC, Zoning Ordinance, and General Plan 2045. In addition, future projects would also comply with requirements related to unstable geologic units or soils of the LACMC, City's Grading Ordinance, CCMC, and the General Plan 2045. Therefore, future development under the Project would not result in landslides, lateral spreading, subsidence, liquefaction, or collapse due to unstable geologic units or soils. As such, implementation of the Project would result in a less than significant impact related to unstable geologic units or soils.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-4 Seismic hazards. Culver City residents and businesses are prepared for earthquake hazards, minimizing the economic impact of strong ground shaking, liquefaction, and fault rupture on public and private property.

S-4.1: Retrofitting and rehabilitation. Promote strengthening planned utilities (where feasible) and retrofitting and rehabilitating existing potentially hazardous structures and aging lifeline utilities to increase public safety and minimize potential damage from seismic and geologic hazards and inadequate maintenance.

S-4.2: Project permit and review process. Strengthen the project permit and review process to ensure that proper actions are taken to mitigate potential adverse effects of seismic hazards. Consider structural and nonstructural seismic design and construction practices that minimize earthquake damage to critical facilities and structures designed for human occupancy.

S-4.3: Geological and geotechnical investigations. Continue to require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

S-4.4: Development or redevelopment within the Newport-Inglewood Fault Zone.

Monitor development or redevelopment within the Newport-Inglewood Fault Zone in accordance with State law.

S-4.7: Earthquake-safe design. Ensure that new structures are designed to, and existing structures perform such that they, minimize risk associated with earthquake hazards.

S-4.8: Seismic code enforcement. Continue enforcing the California Building Standards Code's Seismic Design Category provisions, including those related to near-source seismic conditions.

S-4.9: Seismic vulnerability inventory. Continue maintaining an inventory of private buildings vulnerable to seismic activity, including unreinforced masonry and soft story structures. Prioritize retrofitting more vulnerable structures.

S-4.10: Seismic retrofit funding. Continue to identify potential funding sources to assist with seismic retrofits.

S-4.12: Liquefaction vulnerability. Require new development in the liquefaction vulnerability zone to conduct liquefaction vulnerability studies with mitigation measures that addresses liquefaction, when warranted, for geological reports that the City requires emphasis on lower-income families.

Goal S-5 Geologic hazards. The Blair Hills and Culver Crest neighborhoods are protected from the social and economic effects of geologic hazards associated with unstable slopes.

S-5.1: Development in areas with high landslide potential. Continue ensuring required compliance with State regulations during development and redevelopment within areas with high landslide potential during environmental and development review processes.

S-5.2: Site stability. Continue to require the following, when determined necessary, through standard City requirements, the Hillside Grading and Permitting Ordinance, the California Environmental Quality Act (CEQA), and other regulations:

- Preliminary geotechnical and geologic investigations in areas with high landslide potential;
- Evaluation of site stability and possible impact on adjacent properties, before final project design is approved; and
- Preparation of reports, investigations, and design recommendations for grading permits, building permits, and subdivision applications by a State-geotechnical engineer and State-certified engineering geologist.

S-5.3: Building safety. Continue to require the following, when determined necessary through City requirements, CEQA, and other regulations:

- Meeting the California Building Standards Code and Hillside Grading and Permitting Ordinance adopted by Culver City, coordinating between the project civil engineer, engineering geologist, and geotechnical engineer during grading and construction operations; and
- Certifying that building sites are stable to potential adverse effects of rain, earthquakes, and differential settlement before issuing building permits.

S-5.4: Geotechnical site investigations. Require geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path. Establish standards to improve setbacks or surface/subsurface drainage, construct buttresses or other retaining structures, or reconstruct slopes, that will minimize future risk to persons and property or public liability.

S-5.5: Geologic hazard management. Whenever possible, mitigate geologic hazards in a manner that preserves the aesthetic or natural conditions of hillside areas through minimal grading, or corrective landform grading and revegetation with appropriate plant materials. When these goals conflict, protecting life and property shall take precedence.

S-5.6: Vegetation management. Reduce the potential for landslides by sufficiently removing dead, woody vegetation after a catastrophic fire.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to unstable geologic units or soils.

Expansive Soils

Threshold GEO-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update resulted in development located on expansive soils, as defined in Table 1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property.

Impact Statement GEO-4: While some future development under the Project could be located on expansive soils, compliance with all applicable geotechnical and engineering regulations in the CBC and CMCC as well as consistency with the goals and policies of the General Plan 2045 would minimize risks associated with expansive soils or subsidence. Therefore, impacts related to expansive soils would be considered less than significant.

General Plan 2045

Soils that exhibit expansive properties when exposed to varying moisture content over time could result in damage to foundations, walls, or other improvements. As discussed above in Section 4.6.2, *Environmental Setting*, expansive soils within the Planning Area are generally located around Baldwin Hills due to their high clay content. Thus, future development facilitated under the Project in the Baldwin Hills area could potentially occur on expansive soils.

As discussed above, all future development would be required to be designed, engineered, and constructed in accordance with the requirements and standards of the CBC, LACMC, and CMCC, which requires that foundations and other structural support features be designed to resist or absorb damaging forces from expansive soils. The potential hazards of expansive soils would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state and local requirements, such as CBC,

CCMC, and LACMC requirements that regulate the analysis of expansive soils within the City and SOI. Geotechnical investigations would be required to thoroughly evaluate site-specific geotechnical characteristics of subsurface soils to assess potential hazards and recommend site preparation and design measures to address any hazards which may be present.

In addition, Policies S-4.1, S-4.3, and S-5.3 of the Safety Element address the risk of expansive soils, such as requiring site-specific geotechnical investigations and mitigation measures, as necessary, and enforcement of the City's seismic and building codes. For these reasons, the impact related to hazards associated with expansive soils would be less than significant.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan within the city. Future development under the Zoning Code Update would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC within the CMC, including the Grading Ordinance, and Zoning Ordinance. Therefore, future development under the Project would not result in geologic hazards associated with expansive soils. As such, implementation of the Project would result in a less than significant impact related to unstable expansive soils.

Applicable Proposed General Plan Goals and Policies

Safety Element

S-4.1: Retrofitting and rehabilitation. Promote strengthening planned utilities (where feasible) and retrofitting and rehabilitating existing potentially hazardous structures and aging lifeline utilities to increase public safety and minimize potential damage from seismic and geologic hazards and inadequate maintenance.

S-4.3: Geological and geotechnical investigations. Continue to require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

S-5.3: Building safety. Continue to require the following, when determined necessary through City requirements, CEQA, and other regulations:

- Meeting the California Building Standards Code and Hillside Grading and Permitting Ordinance adopted by Culver City, coordinating between the project civil engineer, engineering geologist, and geotechnical engineer during grading and construction operations; and
- Certifying that building sites are stable to potential adverse effects of rain, earthquakes, and differential settlement before issuing building permits.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to expansive soils.

Paleontological Resources

Threshold GEO-5: The Project would have a potentially significant impact if implementation of the General Plan 2045 and Zoning Code Update would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Statement GEO-5: Specific project-related demolition, construction, maintenance, and/or improvement activities would have the potential to cause a potentially significant impact to paleontological resources. Implementation of Mitigation Measure MM GEO-1 and applicable policies in the General Plan 2045 would reduce impacts to paleontological resources to a less than significant level.

General Plan 2045

As previously discussed, the records search from the LACM has indicated that four fossil localities have been recorded within the boundaries of the city and that eight other localities are located outside the city (either immediately adjacent or within several miles) but from the same sedimentary deposits (older Quaternary alluvium deposits and the San Pedro Sand) that occur within and throughout the city. Additional fossil localities have been identified recently within the city that were discovered at depth during construction of private redevelopment projects. The fossil localities have yielded multiple specimens of plants and animals including mammoth, mastodon, camel, human, horses, saber-toothed cat, duck, and multiple invertebrates (e.g., clam shells, gastropods, etc.) that have been recovered in previously undisturbed sediments between 6 and 55 feet bgs and unknown depths.

Moreover, it is possible that additional paleontological resources are present within the Planning Area that have yet to be discovered; therefore, the current or prior existence of development throughout the Planning Area does not preclude the presence of paleontological resources located underneath this development. As mentioned in this section, several paleontological resources have been identified within the city at depth during paleontological monitoring of construction project sites that have undergone extensive development over many years.

Examples of paleontological resource recovered in the Planning Area that would be scientifically important include those that represent a new or rare species, geologic (temporal) and/or geographic range extension, an age-diagnostic or environmentally sensitive species, and/or a more complete specimen than those now available for their respective species.

Future development implemented under the General Plan 2045 that includes construction-related ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring/drilling) into previously undisturbed sediments are activities that have potential to directly or indirectly destroy paleontological resources. Future development that does not require ground-disturbing activities into undisturbed sediments or ground-disturbing activities into artificial fill would cause no impacts on paleontological resources. However, intact paleontological resources may be encountered beneath the depth of previous disturbances or in pockets of undisturbed sediments within existing developments.

Anticipated development in the Planning Area would occur through activities such as infill development on vacant property, and through redevelopment, some of which could result in damage to paleontological resources. In addition, certain infrastructure and other improvements requiring ground disturbance into undisturbed sediments could result in damage to or destruction of paleontological resources buried below the ground surface. Therefore, impacts to paleontological resources are considered potentially significant.

However, as part of the entitlement process, the City would require and specify steps to be taken to avoid damage and promote preservation if unknown paleontological resources were to be uncovered during construction. In addition, Conservation Element Policies C-1.15 and C-1.21 would promote public knowledge and protection of paleontological resources. Furthermore, mitigation measure MM GEO-1 would serve to reduce the impacts to paleontological resources to a less-than-significant level.

Mitigation Measure MM-GEO-1 is required for some future projects to ensure that paleontological resources are properly identified during the CEQA planning process and that the impact on any identified significant resources is reduced. These future projects within the city would be subject to project-specific paleontological studies, which would include a site-specific database search through the LACM and/or other appropriate facilities; geologic map and scientific literature review; a pedestrian field survey (if deemed appropriate by the qualified professional paleontologist); assessment of the project area's potential to have undisturbed sediments that are conducive to retaining resources, paleontological construction monitoring requirements (if necessary); and preparation of a technical report that documents the methods and results of the study. These paleontological studies would be prepared during the CEQA planning process (i.e., prior to construction).

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan within the city. Future development under the Zoning Code Update would be required to comply with all applicable requirements of the Zoning Ordinance, applicable mitigation measures such as MM-GEO-1, and implementing standard conditions of approval to avoid damage and promote preservation of paleontological resources. Therefore, potentially significant impacts to paleontological resources from some future Projects would be reduced to a less than significant level with mitigation incorporated.

Applicable Proposed General Plan Goals and Policies

Conservation Element

C-1.15: Public knowledge promotion. Promote public knowledge and understanding of cultural resources (including archaeological, tribal cultural resources, historic resources, and paleontological resources) present within the city.

C-1.21: Protect Archaeological, Paleontological, and Tribal Cultural Resources. Promote programs and policies to protect known archaeological and paleontological sites and Tribal Cultural Resources.

Mitigation Measures

MM-GEO-1. Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.

Level of Significance After Mitigation

With implementation of the mitigation measures MM-GEO-1 and standard conditions of approval to avoid damage and promote preservation of paleontological resources, potential significant impacts related to paleontological resources would be reduced to a less-than-significant level.

4.6.5 Cumulative Impacts Analysis

The geographic context for the analysis of impacts related to geology and soils is generally site-specific, rather than cumulative in nature, because each development site has unique geologic considerations that would be subject to site development and construction standards. In this way, potential cumulative impacts relating to geology and soils would be minimized on a site-by-site basis to the extent that appropriate construction methods and applicable code requirements are followed. Therefore, future development in the western Los Angeles County, including growth anticipated under the General Plan 2045, would not result in a significant cumulative impact with respect to geology and soils.

The cumulative context for paleontological resources is the Planning Area and the larger Los Angeles County region. Development in Los Angeles County has resulted in the disturbance of land across almost of the entire region, thus resulting in the disturbance of unknown paleontological resources. It is reasonable to assume that present and future development activities in the region would continue to uncover unknown paleontological resources, and thus the cumulative impact of future development in the region on this resource would be potentially significant. The Planning Area has the potential to yield paleontological resources, and significant fossil discoveries have occurred within the Planning Area in the past. Future development projects anticipated within the Planning Area may involve grading, excavation, or

other ground-disturbing activities into undisturbed sediments, which could destroy unknown paleontological resources. However, with the implementation of applicable local, State, and federal laws, the City's standard conditions of development approval related to avoidance and preservation of paleontological resources, and mitigation measure MM-GEO-1, the contribution of the Project to this cumulative impact would not be cumulatively considerable.

4.7 Greenhouse Gas Emissions

4.7.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on greenhouse gas emissions from future development allowed under the Project, including potential impacts related to generating greenhouse gas (GHG) emissions and conflicting with GHG reduction plans, policies, or regulations. The section provides context regarding the Planning Area's existing conditions, as well as relevant federal, State, and local regulations and programs.

4.7.2 Environmental Setting

Regional Context

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.¹

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.²

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the

¹ United States Environmental Protection Agency (USEPA), 2023b. Climate Change Indicators: Greenhouse Gases, last updated on December 13, 2023. <https://www.epa.gov/climate-indicators/greenhouse-gases>. Accessed January 2024.

² Pew Center on Global Climate Change, 2006. Climate Change 101: Understanding and Responding to Global Climate Change, October 12. https://www.pewtrusts.org/-/media/legacy/uploadedfiles/wwwpewtrustsorg/reports/global_warming/climate101full121406065519pdf.pdf. Accessed January 2024.

Global Carbon Budget 2022 report, published in November 2022, atmospheric CO₂ concentrations in 2022 were found to be more than 50 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.³ Global increases in CO₂ concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO₂ GHGs, these have also increased significantly since 1990.⁴ In particular, studies have concluded that it is very likely that the observed increase in methane (CH₄) concentration is predominantly due to agriculture and fossil fuel use.⁵

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO₂, CH₄, nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).⁶ More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy, which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in **Table 4.7-1, Description of Identified GHGs**.^{7,8}

Not all GHGs possess the same ability to induce climate change. CO₂ is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO₂. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of carbon dioxide (CO₂e). Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper global warming potential (GWP) value.

The larger the GWP, the more that a given gas warms the Earth compared to CO₂ over that time.⁹ These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO₂, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO₂.

³ P. Friedlingstein et al., 2020. Global Carbon Budget 2020. <https://essd.copernicus.org/articles/12/3269/2020/>. Accessed January 2024.

⁴ USEPA, 2023c. Global Greenhouse Gas Emissions Data, last updated on February 15, 2023. www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed January 2024.

⁵ USEPA, 2023a. Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, last updated on November 1, 2023. <https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases>. Accessed January 2024.

⁶ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

⁷ Intergovernmental Panel on Climate Change (IPCC), 1995. Second Assessment Report, Working Group I: The Science of Climate Change.

⁸ IPCC, Fourth Assessment Report, 2007. Working Group I Report: The Physical Science Basis, Table 2.14.

⁹ GWPs and associated CO₂e values were developed by IPCC and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.

**TABLE 4.7-1
 DESCRIPTION OF IDENTIFIED GHGS**

GHG	General Description
Carbon Dioxide (CO₂)	An odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO ₂ are burning coal, oil, natural gas, and wood.
Methane (CH₄)	A flammable gas and the main component of natural gas. When one molecule of CH ₄ is burned in the presence of oxygen, one molecule of CO ₂ and two molecules of water are released. A natural source of CH ₄ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH ₄ , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N₂O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF₆)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF₃)	An inorganic, non-toxic, odorless, non-flammable gas. NF ₃ is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

NOTE: GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

SOURCES: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; U.S. Environmental Protection Agency, Acute Exposure Guideline Levels (AEGs) for Nitrogen Trifluoride; January 2009.

The IPCC updated the GWP values based on the science in its Fourth Assessment Report (AR4).^{10,11} The California Air Resources Board (CARB) reports GHG emission inventories for California using the GWP values from the IPCC AR4, which is consistent with international reporting standards. By applying the GWP ratios, Project-related CO₂e emissions can be

¹⁰ IPCC, Fourth Assessment Report, 2007. Working Group I Report: The Physical Science Basis.

¹¹ IPCC, 1995. Second Assessment Report, Working Group I: The Science of Climate Change.

tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO₂ over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has reduced down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software California Emissions Estimator Model (CalEEMod) is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in **Table 4.7-2, Atmospheric Lifetimes and GWPs**.

**TABLE 4.7-2
 ATMOSPHERIC LIFETIMES AND GWPs**

Gas	Atmospheric Lifetime (Years)	GWP (100-Year Time Horizon) (AR4 Assessment)	GWP (100-Year Time Horizon) (AR5 Assessment)
Carbon Dioxide (CO ₂)	50-200	1	1
Methane (CH ₄)	12 (+/-3)	25	28
Nitrous Oxide (N ₂ O)	114	298	265
HFC-23: Fluoroform (CHF ₃)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH ₂ FCF ₃)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane (C ₂ H ₄ F ₂)	1.4	124	138
PFC-14: Tetrafluoromethane (CF ₄)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C ₂ F ₆)	10,000	12,200	11,100
Sulfur Hexafluoride (SF ₆)	3,200	22,800	23,500
Nitrogen Trifluoride (NF ₃)	740	17,200	16,100

SOURCE: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials.

Existing Statewide Greenhouse Gas Emissions

CARB compiles GHG inventories for California. Based on the year 2021 GHG inventory data (the latest year for which data are available), California emitted 381.3 million metric tons of CO₂e (MMTCO₂e) which includes emissions resulting from imported electrical power.¹² Between 1990 and 2023, the population of California grew by approximately 32 percent (from 29.8 to 38.9 million).^{13,14} In addition, the California economy, measured as gross state product, grew from approximately \$773 billion in 1990 to \$3.6 trillion in 2022, representing an increase of

¹² California Air Resources Board, 2024b. Current California GHG Emission Inventory Data – 2000–2021 GHG Inventory (2023 Edition). <https://ww2.arb.ca.gov/ghg-inventory-data>. Accessed January 2024.

¹³ United States Census Bureau, 1995. National and State Population Estimates: 1990–1994, 1995.

¹⁴ California Department of Finance, 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020–2023. https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-5_2023_InternetVersion.xlsx. Accessed January 2024.

approximately five times the 1990 gross state product.¹⁵ Despite the population and economic growth, California’s net GHG emissions were reduced to below 1990 levels in 2016 and has continued to decline. According to CARB, the declining trend coupled with the State’s GHG reduction programs (such as the Renewables Portfolio Standard [RPS], Low Carbon Fuel Standard [LCFS], vehicle efficiency standards, and declining caps under the Cap-and-Trade Program) demonstrate that California is on track to meet the 2030 GHG reduction target of 40 percent below 1990 levels codified in Executive Order B-30-15. **Table 4.7-3, State of California Greenhouse Gas Emissions**, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2021 (i.e., the most recent year in which data are available from CARB). As shown in Table 4.7-3, the transportation sector is the largest contributor to statewide GHG emissions at approximately 39 percent in 2021.

**TABLE 4.7-3
 STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS**

Category	Total 1990 Emissions using IPCC SAR (MMTCO ₂ e)	Percent of Total 1990 Emissions	Total 2021 Emissions using IPCC AR4 (MMTCO ₂ e)	Percent of Total 2021 Emissions
Transportation	150.7	35%	145.6	38%
Electric Power	110.6	26%	62.4	16%
Commercial	14.4	3%	13.3	4%
Residential	29.7	7%	25.5	7%
Industrial	103.0	24%	73.9	19%
Recycling and Waste ^a	—	—	8.4	2%
High GWP/Non-Specified ^b	1.3	<1%	21.3	6%
Agriculture/Forestry	23.6	6%	30.9	8%
Forestry Sinks	-6.7	—	— ^c	—
Net Total (IPCC SAR)	426.6	100%	—	—
Net Total (IPCC AR4)^d	431	100%	381.3	100%

NOTES: IPCC = Intergovernmental Panel on Climate Change; SAR = Second Assessment Report; AR4 = Fourth Assessment Report; MMTCO₂e = million metric tons of carbon dioxide equivalent; GWP = global warming potential

Totals may not add up exactly due to rounding.

^a Included in other categories for the 1990 emissions inventory.

^b High GWP gases are not specifically called out in the 1990 emissions inventory.

^c Revised methodology under development (not reported for 2021).

^d CARB revised the state’s 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCE: California Air Resources Board, 2023e, California Greenhouse Gas Inventory for 2000 to 2021, by Category as Defined in the 2008 Scoping Plan, December 13, 2023. https://ww2.arb.ca.gov/sites/default/files/2023-12/ghg_inventory_scopingplan_sum_2000-21.pdf. Accessed January 2024

Urban Heat Island

According to the California Environmental Protection Agency (CalEPA), the urban heat island effect refers to large, urbanized areas that experience higher temperatures, greater pollution and more negative health impacts during hot summer months when compared to more rural

¹⁵ California Department of Finance, 2023. Gross State Product in California. <https://dof.ca.gov/wp-content/uploads/sites/352/2023/06/CA-GDP.xlsx>. Accessed January 2024. Amounts are based on current dollars as of the date of the report (June 2023).

communities.¹⁶ Heat islands are created by a combination of heat-absorptive surfaces (such as dark pavement and roofing), heat-generating activities (such as engines and generators) and the absence of vegetation (which provides evaporative cooling). Daytime temperatures in urban areas are on average 1 to 6 degrees Fahrenheit (F) higher than in rural areas, while nighttime temperatures can be as much as 22 degrees F higher as the heat is gradually released from buildings and pavement.¹⁷ Assembly Bill (AB) 296 (Chapter 667, Statutes of 2012) required that CalEPA develop an Urban Heat Island Index (UHII) to quantify the extent and severity of an urban heat island for individual cities to map where and how intensely they manifest at a local scale.¹⁸ In 2015, CalEPA released maps that show the scientifically assigned UHII scores based on atmospheric modeling for each census tract in and around most urban areas throughout the state. The urban area in which the city of Culver City is located has an approximate UHII range of 2001 to 4000 degree-hours per 182 days or 11 to 22 degree-hours per day (Celsius scale).¹⁹ The UHII range is equivalent to an average temperature difference between rural and urban areas of approximately 0.8 to 3.3 degrees F.²⁰ It is important to note that the UHII does not measure the temperatures of an area, but rather it measures the average temperature difference between rural and urban areas within a region.

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties, for example, in predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report: Summary for Policy Makers* (dated 2013) states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forces [sic] together."²¹ In addition, a report from the National Academy of Sciences published in 2010 concluded that 97 to 98 percent of the

¹⁶ California Environmental Protection Agency, 2023b. Understanding the Urban Heat Island Index. <https://calepa.ca.gov/climate/urban-heat-island-index-for-california/understanding-the-urban-heat-island-index/>. Accessed January 2024.

¹⁷ California Environmental Protection Agency, 2023b. Understanding the Urban Heat Island Index. <https://calepa.ca.gov/climate/urban-heat-island-index-for-california/understanding-the-urban-heat-island-index/>. Accessed January 2024.

¹⁸ California Environmental Protection Agency, 2023b. Understanding the Urban Heat Island Index. <https://calepa.ca.gov/climate/urban-heat-island-index-for-california/understanding-the-urban-heat-island-index/>. Accessed January 2024.

¹⁹ California Environmental Protection Agency, 2023c. Understanding the Urban Heat Island Index, Appendix C, Figure C41. <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/UrbanHeat-Report-AppendixC.pdf>. Accessed January 2024. According to CalEPA, the degree-hour combines both the intensity of the heat and the duration of the heat into a single numerical measure.

²⁰ According to CalEPA, to perform an approximate conversion to a total number of degrees Fahrenheit per day, divide the Index by 24 hours and multiply the result by 1.8 degrees. For example, if the Index is 44 degree-hours per day, then the approximate average temperature difference between rural and urban in that area is 3.3 degrees F (i.e., $44 / 24 * 1.8 = 3.3$).

²¹ IPCC, 2013. Fifth Assessment Report, Summary for Policy Makers, page 17.

climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.²²

According to CalEPA, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more frequent and a greater spatial extent of forest fires; more drought years; increased erosion of California’s coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.²³ The California Energy Commission (CEC) has a geospatial data tool (Cal-Adapt) that provides a view of how the state could be impacted by climate change. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

Air Quality

Higher temperatures have been determined to be conducive to air pollution formation and, therefore, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone; however, the magnitude of the effect is uncertain. If higher temperatures resulting from climate change are accompanied by drier conditions, the potential for large wildfires could increase within the Los Angeles region, which, in turn, would further worsen air quality. However, if higher temperatures resulting from climate change are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating some of the pollution associated with wildfires, although it would not eliminate all effects of increased temperatures. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.²⁴

According to the Cal-Adapt website’s “Local Climate Change Snapshot” database, Culver City could see an average annual increase in maximum temperature to 73.8 to 74.6°F in the mid-century (2035–2064) and 74.8 to 77.7°F at the end of the century (2070–2099) compared to 70.8°F for the baseline period (1961–1990). The average annual number of extreme heat days also could increase to 5 to 6 days in the mid-century (2035–2064) and 7 to 16 days at the end of the century (2070–2099) compared to 2 days for the baseline period (1961–1990).²⁵

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, “Considerable uncertainty about precise impacts

²² Anderegg, William R. L., J.W. Prall, J. Harold, S.H. Schneider, 2010. Expert Credibility in Climate Change, *Proceedings of the National Academy of Sciences of the United States of America*. 107:12107–12109.

²³ California Environmental Protection Agency, 2006. Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=204014&DocumentContentId=2726>. Accessed January 2024.

²⁴ California Environmental Protection Agency, 2006. Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=204014&DocumentContentId=2726>. Accessed January 2024.

²⁵ CalAdapt, 2024. Local Climate Change Snapshot Culver City, California. <https://cal-adapt.org/tools/local-climate-change-snapshot/>. Accessed January 2024.

of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change.”²⁶ For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.²⁷ Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.²⁸ Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.²⁹

According to the Cal-Adapt website’s “Local Climate Change Snapshot” database, Culver City could see an average annual length of dry spells of 168 to 169 days in the mid-century (2035–2064) and 169 to 177 days at the end of the century (2070–2099), compared to 161 days for the baseline period (1961–1990). The average annual precipitation could decrease to 14.5 to 14.6 inches in the mid-century (2035–2064) and potentially increase or decrease to 14.9 to 14.7 inches at the end of the century (2070–2099), compared to 14.8 inches for the baseline period (1961–1990).³⁰

The California Department of Water Resources (CDWR) report dated 2006 on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concluded that “climate change will likely have a significant effect on California’s future water resources...[and] future water demand.” It also reported that “much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain.” It also reported that the relationship between climate change and its potential effect on water demand is not well understood, but “[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future.” Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.³¹ In its Fifth Assessment Report, the IPCC states “Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation

²⁶ Pacific Institute for Studies in Development, Environment and Security, 2003. Climate Change and California Water Resources: A Survey and Summary of the Literature. July. https://pacinst.org/wp-content/uploads/2003/07/climate_change_and_california_water_resources.pdf. Accessed January 2024.

²⁷ Pacific Institute for Studies in Development, Environment and Security, 2003. Climate Change and California Water Resources: A Survey and Summary of the Literature. July. https://pacinst.org/wp-content/uploads/2003/07/climate_change_and_california_water_resources.pdf. Accessed January 2024.

²⁸ Pacific Institute for Studies in Development, Environment and Security, 2003. Climate Change and California Water Resources: A Survey and Summary of the Literature. July. https://pacinst.org/wp-content/uploads/2003/07/climate_change_and_california_water_resources.pdf. Accessed January 2024.

²⁹ Pacific Institute for Studies in Development, Environment and Security, 2003. Climate Change and California Water Resources: A Survey and Summary of the Literature. July. https://pacinst.org/wp-content/uploads/2003/07/climate_change_and_california_water_resources.pdf. Accessed January 2024.

³⁰ CalAdapt, 2024. Local Climate Change Snapshot Culver City, California. <https://cal-adapt.org/tools/local-climate-change-snapshot/>. Accessed January 2024.

³¹ California Department of Water Resources, 2006. Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources, page 2-75.

between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions.”³²

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California’s water supply, and increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events. Models estimate that under mid to high sea-level rise scenarios (3 to 6.6 feet [0.9 to 2 meters]), 31 to 67 percent of Southern California beaches may completely erode by 2100 without large-scale human interventions.³³

Agriculture

California has a \$30 billion agricultural industry that produces one half of the country’s fruits and vegetables. Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase without planning and preparations. Under changing climate conditions, agriculture is projected to experience lower crop yields due to extreme heat waves, heat stress and increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats.³⁴

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 1.1 to 10.2°F (0.6 to 5.7°C) by 2100, with significant regional variation.³⁵ With increases in global temperatures, soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 3 to 6.6 feet (0.9 to 2 m) along most of the U.S. coastline.³⁶ Rising temperatures and precipitation change could impact ecosystems and wildlife by causing population declines,

³² IPCC, 2013. Fifth Assessment Report, Summary for Policy Makers.

³³ California Climate Change Assessment, 2018. California’s Fourth Climate Change Assessment Statewide Summary Report, November. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed January 2024.

³⁴ California Climate Change Assessment, 2018. California’s Fourth Climate Change Assessment Statewide Summary Report, November. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed January 2024.

³⁵ U.S. Global Change Research Program, 2018. Climate Science Special Report: Fourth National Climate Assessment, Volume 1, Executive Summary. <https://science2017.globalchange.gov/chapter/executive-summary/>. Accessed January 2024.

³⁶ U.S. Global Change Research Program, 2018. Climate Science Special Report: Fourth National Climate Assessment, Volume 1, Executive Summary. <https://science2017.globalchange.gov/chapter/executive-summary/>. Accessed January 2024.

shifting in their geographic distributions or ranges to track suitable climates, and facilitating the spread of invasive species, pest, pathogens, and diseases.³⁷

Wildfire

Wildfires in California over the past two decades are shown to be increasing in size, severity, and adverse impacts.³⁸ Warming temperature as a result of climate change influences the length of both the fire and growing seasons and consequently affects the amount of time and intensity fires burn at and the amount of available fuels. Higher temperatures lead to drought, which decreases the fuel moisture and increases the likelihood of ignitions.³⁹

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, Culver City could see an average annual area burned of approximately 0 acres in the mid-century (2035–2064) and end of the century (2070–2099), compared to 0 acres for the baseline period (1961–1990).⁴⁰ Increased wildfire activity leads to more GHG emissions from sources that would otherwise be carbon sinks.⁴¹ Between 2000 and 2019, emissions from wildfires ranged from a low of 1.2 MMTCO₂e in 2010 to a high of 39 MMTCO₂e in 2018, with an annual average of 14 MMTCO₂e. Further, CARB estimates that wildfire emissions increased dramatically in 2020, totaling 112 MMTCO₂e.⁴²

Humans

Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses direct and indirect risks to public health, as people will experience earlier death and worsening illnesses. Temperature increases cause heat-related deaths and illnesses. In 2006, reported heat-related deaths and illness were much higher than in any other year because of a prolonged heat wave.⁴³ Nineteen heat-related events that had significant impacts on human health occurred from 1999 to 2009, resulting in about 11,000

³⁷ U.S. Global Change Research Program, 2018. Climate Science Special Report: Fourth National Climate Assessment, Volume 1, Executive Summary. <https://science2017.globalchange.gov/chapter/executive-summary/>. Accessed January 2024.

³⁸ CARB, 2020a. Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities. December. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf?utm_medium=email&utm_source=govdelivery. Accessed January 2024.

³⁹ CARB, 2020a. Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities. December. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf?utm_medium=email&utm_source=govdelivery. Accessed January 2024.

⁴⁰ CalAdapt, 2024. Local Climate Change Snapshot Culver City, California. <https://cal-adapt.org/tools/local-climate-change-snapshot/>. Accessed January 2024.

⁴¹ CARB, 2020a. Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities. December. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf?utm_medium=email&utm_source=govdelivery. Accessed January 2024.

⁴² CARB, 2020a. Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities. December. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf?utm_medium=email&utm_source=govdelivery. Accessed January 2024.

⁴³ Office of Environmental Health Hazard Assessment (OEHHA), 2018. Indicators of Climate Change in California. May. <https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf>. Accessed January 2024.

excess hospitalizations.⁴⁴ Additionally, indicators of the impacts of climate change on human health show that warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California.

Existing Conditions

Culver City is a mix of residential, commercial, retail, office, industrial, school, recreational, and open space land uses. A Culver City community wide GHG inventory was conducted in 2019 (2019 Community GHG Inventory Report), with the purpose of showing source types, distribution, and amount of GHG emissions within Culver City.⁴⁵ Specifically, the 2019 Community GHG Inventory Report includes emissions for the calendar year 2019 from electricity, natural gas, transportation, solid waste, off-road equipment, industrial sources, water supply, and wastewater treatment activities occurring within the city limits and the sphere of influence.⁴⁶ The 2019 Community GHG Inventory Report factors in emissions from energy used by buildings, traffic signals, streetlights, water conveyance (both within the jurisdictional boundary and upstream of the city), and wastewater treatment.

The emission sources and activities included in the 2019 Community GHG Inventory Report are based on the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (U.S. Community Protocol). Local Governments for Sustainability (ICLEI) created the U.S. Community Protocol, which sets guidelines and methods that help local governments quantify and report GHG emissions from community-wide activities.⁴⁷ The 2019 Community GHG Inventory Report reviews emissions from sources that local government can influence. This generally includes activities within the City's jurisdictional boundary where the local government has jurisdictional influence and community activities outside City limits, e.g., automobile use by residents. **Table 4.7-4, *Estimated Existing Culver City Operational GHG Emissions (2019)***, presents the community GHG emissions from the existing development in Culver City in 2019.

⁴⁴ California Climate Change Assessment, 2018. California's Fourth Climate Change Assessment Statewide Summary Report, November. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf. Accessed January 2024.

⁴⁵ Culver City, 2021. *2019 Community Greenhouse Gas Inventory Report*. April. https://9021zeroemissions.rinconconsultants.com/wp-content/uploads/2021/11/2.-CulverCity_2019_Community_GHG_Inventory_Clean.pdf. Accessed January 2024.

⁴⁶ Mobile and bus emissions associated with the sphere of influence are reflected in the on-road vehicular transportation calculations. All other calculations reflect sources within the city limits.

⁴⁷ Local Governments for Sustainability (ICLEI) was formerly the International Council for Local Environmental Initiatives.

**TABLE 4.7-4
 ESTIMATED EXISTING CULVER CITY OPERATIONAL GHG EMISSIONS (2019)**

Source	MTCO₂e	Percent
On-road Transportation	164,246	56.3
Natural Gas	59,678	20.4
Electricity	33,740	11.6
Solid Waste	16,529	5.7
Off-road Equipment	14,469	5.0
Water Supply	2,497	0.9
Industrial Sources	383	0.1
Wastewater Treatment	380	0.1
Total	291,922	100

NOTES: MTCO₂e = metric tons of carbon dioxide equivalent
 SOURCE: Culver City, 2021. 2019 Community Greenhouse Gas Inventory Report. April.

4.7.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that carbon dioxide (CO₂) and other GHGs are pollutants under the Federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH₄ and other non-CO₂ gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the U.S. Department of Transportation (USDOT), and the U.S. Department of Energy (USDOE) to establish regulations that

reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for, and GHG emissions from, cars and light-duty trucks for model year 2011 and later for model years 2012–2016 and 2017–2021. In April 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.⁴⁸ These standards set a combined fleet wide average of 33.2 to 37.1 for the model years affected.⁴⁹

In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.⁵⁰ This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.⁵¹

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons.⁵²

On July 28, 2023, the NHTSA proposed new CAFE standards for passenger cars and light trucks for model years 2027 through 2032, and new fuel efficiency standards for heavy-duty pickup trucks and vans for model years 2030 through 2035. The proposed rule would require an industry fleet-wide average of approximately 58 mpg for passenger cars and light trucks in model year 2032, by increasing fuel economy by two percent year over year for passenger cars

⁴⁸ USEPA, 2020. Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30. <https://www.govinfo.gov/content/pkg/FR-2020-04-30/pdf/2020-06967.pdf>. Accessed January 2024.

⁴⁹ USEPA, 2020. Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30. <https://www.govinfo.gov/content/pkg/FR-2020-04-30/pdf/2020-06967.pdf>. Accessed January 2024.

⁵⁰ USEPA, 2021. Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

⁵¹ USEPA, 2021. Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

⁵² USEPA and NHTSA, 2016. Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August. <https://www.govinfo.gov/content/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed January 2024.

and four percent year over year for light trucks.⁵³ For heavy-duty pickup trucks and vans, the proposed rule would increase fuel efficiency by 10 percent year over year.⁵⁴

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and the NHTSA actions described above (refer to United States Department of Transportation, United States Department of Energy, and United States Environmental Protection Agency, above) (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”⁵⁵

State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the state.

Executive Order S-1-07

EO S-1-07⁵⁶ proclaims that the transportation sector is California’s main source of GHG emissions, generating more than 40 percent of statewide emissions. It established a goal to reduce the carbon intensity of transportation fuels sold in California by at least 10 percent by

⁵³ National Highway Traffic Safety Administration, 2023. Corporate Average Fuel Economy. <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy#75896>. Accessed January 2024.

⁵⁴ National Highway Traffic Safety Administration, 2023. Corporate Average Fuel Economy. <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy#75896>. Accessed January 2024.

⁵⁵ A “green job,” as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

⁵⁶ Office of the Governor of California, 2007. Executive Order S-01-07, January 18. <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed January 2024.

2020. This order also directed CARB to determine whether the Low Carbon Fuel Standard could be adopted as a discrete early-action measure, as part of the effort to meet AB 32 mandates.

Executive Order S-3-05

EO S-3-05 set forth the following targets for progressively reducing statewide GHG emissions:⁵⁷

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The executive order directed the Secretary of CalEPA to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is also mandating that biannual reports be submitted to the California Governor and Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in EO S-3-05. The most recent 2022 State Agency Greenhouse Gas Reduction Report Card documents the effectiveness of measures to reduce GHG emissions in California and GHG emissions from state agencies' operations. This report card documents reductions of 1.157 MMTCO₂e that occurred in 2021.⁵⁸ In 2016, GHG emissions were 429 MMTCO₂e, showing that California reached its 2020 emissions target (431 MMTCO₂e) four years early, and emissions are continuing to decline.

Executive Order B-30-15

In 2015, EO B-30-15 promulgated the following targets and measures:⁵⁹

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

⁵⁷ Office of the Governor of California, 2005. Executive Order S-3-05, June 2. <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf>. Accessed January 2024.

⁵⁸ CalEPA, 2023a. 2022 State Agency Greenhouse Gas Reduction Report Card. <https://calepa.ca.gov/wp-content/uploads/sites/6/2023/05/CAT-Report-Card-2022.a.pdf>. Accessed January 2024.

⁵⁹ Office of the Governor of California, 2015. Executive Order B-30-15, April 29. <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/39-B-30-15.pdf>. Accessed January 2024.

Executive Order B-55-18

EO B-55-18 was signed by Governor Edmund G. Brown Jr. on September 10, 2018.⁶⁰ The order establishes an additional statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per EO B-55-18, CARB is directed to work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. California is making progress towards the 2045 goal, however the pathway to carbon neutrality is still under development. According to CARB, there will be a strong reliance on energy efficiency, electrification, low carbon fuels (including low-carbon electricity), and CO₂ removal in future policies and strategies for reaching the ambitious goal. The path to carbon neutrality lies in striving for zero emissions from all new sources and maximum sequestration to offset existing sources.

Assembly Bill 32 – California Global Warming Solutions Act of 2006

In 2006, the California Legislature adopted Assembly Bill (AB) 32 (Health and Safety Code Division 25.5), also known as the California Global Warming Solutions Act of 2006, with a focus on reducing GHG emissions in California to 1990 levels by 2020. This act defines GHGs as CO₂, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. The California Global Warming Solutions Act assigned CARB the primary responsibility for reducing GHG emissions, by adopting rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

As required by the California Global Warming Solutions Act, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020, originally set at 427 MMTCO₂e, using the GWP values from the IPCC SAR. CARB established the GHG emissions reduction target based on GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO₂e.

CARB approved the initial AB 32 Scoping Plan in 2008.⁶¹ It approved the First Update to the Climate Change Scoping Plan (2014 Scoping Plan) in May 2014 and built upon the 2008 Scoping Plan with new strategies and recommendations.⁶² In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO₂e. CARB also updated the state's 2020 business-as-usual (BAU) emissions estimate to account for the impact of the 2007– 2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by

⁶⁰ Office of the Governor of California, 2018. Executive Order, September 10. <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Accessed January 2024.

⁶¹ CARB, 2009. Climate Change Scoping Plan *a framework for change*, December.

⁶² CARB, 2014. First Update to the Climate Change Scoping Plan Building on the Framework, May.

regulation that were adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO_{2e}.

Therefore, under the 2014 Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO_{2e} would be 78.4 MMTCO_{2e}, or a reduction of GHG emissions by approximately 15.4 percent.

Senate Bill 32 and Assembly Bill 197

In 2016, the California Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197. SB 32 and AB 197 amended Health and Safety Code Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030, with provisions included to ensure that the benefits of state climate policies reach into vulnerable communities. In response to the 2030 GHG reduction target, CARB adopted the 2017 Scoping Plan.⁶³ The 2017 Scoping Plan outlines the strategies the state will implement to achieve the 2030 GHG emissions reduction target, which build on the Cap-and-Trade Program; the Low Carbon Fuel Standard; improved vehicle, truck, and freight movement emissions standards; increasing renewable energy; and strategies to reduce methane emissions from agricultural and other wastes by using it to meet California's energy needs. CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The adopted 2017 Scoping Plan includes ongoing and statutorily required programs and the continuation of the Cap-and-Trade Program. This Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398,⁶⁴ including removal of the 20 percent refinery measure.

The 2017 Scoping Plan outlines the strategies the State of California will implement to achieve the 2030 GHG emissions reduction target. The 2017 Scoping Plan includes the Scoping Plan Scenario, which CARB stated "is the best choice to achieve the state's climate and clean air goals".⁶⁵ Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34–79 MMTCO_{2e} of the 2030 reduction obligation.⁶⁶ The short-lived GHG strategy is expected to cover approximately 17–35 MMTCO_{2e}. The Renewables Portfolio Standard with 50 percent renewable electricity by 2030 is expected to cover approximately 3 MMTCO_{2e}. The mobile-source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of ZEVs, and improving the efficiency of the freight system, and is expected to cover approximately 11–13 MMTCO_{2e}. Under the Scoping Plan Scenario, CARB expects that the doubling of the energy efficiency savings by 2030 would cover approximately 7–9 MMTCO_{2e} of

⁶³ CARB, 2017. California's 2017 Climate Change Scoping Plan, November.

⁶⁴ AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

⁶⁵ CARB, 2017. California's 2017 Climate Change Scoping Plan, November.

⁶⁶ CARB, 2017. California's 2017 Climate Change Scoping Plan, November.

the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

The 2017 Scoping Plan also discusses the role of local governments in meeting the state’s GHG reductions goals because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.⁶⁷ The 2017 Scoping Plan encourages local governments to adopt climate action plans (CAPs) to address local GHG emissions sources. For individual projects under the California Environmental Quality Act (CEQA), the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the 2017 Scoping Plan, the State’s long-term goals, and climate change science.⁶⁸

Assembly Bill 1279 and 2022 Scoping Plan

The Legislature enacted AB 1279, The California Climate Crisis Act, on September 16, 2022.⁶⁹ AB 1279 establishes the policy of the State of California to achieve net zero GHG emissions as soon as possible but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. Additionally, AB 1279 mandates that by 2045, statewide anthropogenic GHG emissions are to be reduced at least 85 percent below 1990 levels. AB 1279 also requires CARB to ensure that the Scoping Plan identifies and recommends measures to achieve carbon neutrality, and to identify and implement policies and strategies for CO₂ removal solutions and carbon capture, utilization, and storage technologies. It also requires CARB to submit an annual report on progress in achieving the Scoping Plan’s goals.

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), adopted by CARB in December 2022, expands on prior scoping plans. The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. This plan responds to more recent legislation, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state’s climate target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, while also assessing the progress California is making toward the 40 percent below 1990 levels by 2030, and achieving carbon neutrality⁷⁰ by 2045 or earlier.⁷¹ The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The 2022 Scoping Plan outlines the strategies the state will implement to achieve carbon neutrality by reducing GHG emissions to meet the anthropogenic

⁶⁷ CARB, 2017. California’s 2017 Climate Change Scoping Plan, November.

⁶⁸ CARB, 2017. California’s 2017 Climate Change Scoping Plan, November.

⁶⁹ California Legislative Information, 2022. AB-1279 The California Climate Crisis Act (2012-2022), September 16. https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1279. Accessed January 24.

⁷⁰ *Carbon neutrality* means “net zero” emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of CO₂ that is stored, both in natural sinks and through mechanical sequestration. AB 1279 uses the terminology “net zero” and the 2022 Scoping Plan uses the terminology “carbon neutrality” or “carbon neutral.” For purposes of this PEIR, these terms mean the same thing and are used interchangeably.

⁷¹ CARB, 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality, December.

target, and by expanding actions to capture and store carbon through the state’s natural and working lands and using a variety of mechanical approaches. A summary of the GHG emissions reductions and targets set forth under the 2022 Scoping Plan Update is provided in **Table 4.7-5, Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan.**

**TABLE 4.7-5
 ESTIMATED STATEWIDE GREENHOUSE GAS EMISSIONS REDUCTIONS IN THE 2022 SCOPING PLAN**

Emissions Scenario	GHG Emissions (MMTCO₂e)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%) ^a
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)
MMTCO ₂ e = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.	
^a 312 – 260 = 52 /312 = 16.7%	
SOURCE: CARB, 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality, December.	

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor’s Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. **Table 4.7-6, Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan,** provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

**TABLE 4.7-6
 MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN**

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) <i>The California Climate Crisis Act</i>	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO ₂ removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in 2022 Scoping Plan Update.

Bill/Executive Order	Summary
<p>Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) <i>Carbon Capture, Removal, Utilization, and Storage Program</i></p>	<p>SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology.</p> <p>The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project.</p> <p>The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.</p>
<p>Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) <i>Diablo Canyon Powerplant: Extension of Operations</i></p>	<p>SB 846 extends the Diablo Canyon Power Plant’s sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the CPUC not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant.</p> <p>The 2022 Scoping Plan Update explains the emissions impact of this legislation.</p>
<p>Senate Bill (SB 1020) (Laird, Chapter 361, Statutes of 2022) <i>Clean Energy, Jobs, and Affordability Act of 2022</i></p>	<p>SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, CEC, and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability.</p> <p>The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment.</p> <p>The 2022 Scoping Plan Update describes the implications of this legislation on emissions.</p>
<p>Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) <i>Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors</i></p>	<p>SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.</p>
<p>Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) <i>Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases</i></p>	<p>SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen</p>

Bill/Executive Order	Summary
	<p>production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses.</p> <p>This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.</p>
<p>Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022)</p> <p><i>California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands</i></p>	<p>AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience.</p> <p>This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO₂, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible.</p> <p>This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.</p>
<p>Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022)</p> <p><i>Hydrofluorocarbon gases: sale or distribution</i></p>	<p>SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) hydrofluorocarbons (HFCs) to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.</p>
<p>Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021)</p> <p><i>Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects</i></p>	<p>SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO₂ removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding.</p> <p>CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry.</p> <p>This bill is reflected directly in 2022 Scoping Plan Update as CO₂ removal targets for 2030 and 2045 in support of carbon neutrality.</p>
<p>Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021)</p> <p><i>Greenhouse Gases: Cement Sector: Net-Zero Emissions Strategy</i></p>	<p>SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must:</p> <p>Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions.</p> <ul style="list-style-type: none"> • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. <p>The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.</p>

Bill/Executive Order	Summary
<p>Executive Order N-82-20</p>	<p>Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California’s land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state’s carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.</p> <p>CO₂ Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to:</p> <ul style="list-style-type: none"> • Establish a baseline assessment of California’s biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California’s biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. <p>CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state’s process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production.</p> <p>The Natural and Working Lands Climate Smart Strategy informs 2022 Scoping Plan Update.</p>
<p>Executive Order N-79-20</p>	<p>Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are:</p> <ul style="list-style-type: none"> • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. <p>The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above.</p> <p>The 2022 Scoping Plan Update modeling reflects achieving these targets.</p>

Bill/Executive Order	Summary
<p>Executive Order N-19-19</p>	<p>Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that:</p> <ul style="list-style-type: none"> • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. <p>Executive Order N-19-19 directs the State Transportation Agency to leverage more than \$5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by:</p> <ul style="list-style-type: none"> • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. <p>The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.</p>
<p>Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019)</p> <p><i>Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program</i></p>	<p>Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.</p>
<p>Assembly Bill 65 (AB 65) (Petrie- Norris, Chapter 347, Statutes of 2019)</p> <p><i>Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans</i></p>	<p>This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.</p>

Bill/Executive Order	Summary
<p>Executive Order B-55-18</p>	<p>Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:</p> <ul style="list-style-type: none"> • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state’s water supply, water quality, and native plants and animals. <p>This Executive Order also calls for CARB to:</p> <ul style="list-style-type: none"> • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. <p>The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.</p>
<p>Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) <i>California Renewables Portfolio Standard Program: emissions of greenhouse gases</i></p>	<p>Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.</p> <p>The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.</p>
<p>Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) <i>Electric Vehicle Charging Infrastructure: Assessment</i></p>	<p>This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure.</p> <p>This bill supports the deployment of ZEVs as modeled in 2022 Scoping Plan Update.</p>
<p>Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) <i>Insurance: Climate Change</i></p>	<p>This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.</p>
<p>Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) <i>Near-Zero-Emission and Zero-Emission Vehicles</i></p>	<p>Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.</p>

The 2022 Scoping Plan Update identifies the need to accelerate AB32’s 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California’s Legislature and state agencies will continue to collaborate to achieve the state’s climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state’s near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes “recommendations intended to build momentum for local government actions that align with the State’s climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA).” Appendix D is intended to provide clarification on challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects.⁷²

⁷² CARB, 2022b. 2022 Scoping Plan for Achieving Carbon Neutrality – Appendix D: Local Actions, November.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State’s GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by addressing it in the Culver City General Plan and Zoning Code Update and 2019 Community Greenhouse Gas Inventory Report and developing programs and regulations such as the Culver City Green Building Ordinance, Culver City Bicycle & Pedestrian Action Plan, Culver City’s Electric Vehicle (EV) Infrastructure Plan, and Culver City Clean Power Alliance. Each of these is discussed further below.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Pursuant to its authority under AB 32, CARB has designed and adopted the California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emissions reduction mandate of returning to 1990 levels of emissions by 2020 (17 CCR Sections 95800–96023).

The Cap-and-Trade Program establishes an overall limit for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 MTCO₂e per year) and declines over time, and facilities subject to the cap may trade permits to emit GHGs. The statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emissions reductions throughout the program’s duration (17 CCR Sections 95811 and 9512). On July 17, 2017, the California Legislature enacted AB 398, extending the Cap-and-Trade Program through 2030.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the statewide emission limits will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. In other words, because climate change is a global occurrence and the impacts of GHG emissions are considered cumulative, a focus on aggregate GHG emissions reductions, rather than source-specific reductions, is warranted.

California Environmental Quality Act Guidelines

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring the Governor’s Office of Planning and Research (OPR) to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, OPR adopted the CEQA Guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.⁷³ The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.⁷⁴

On December 28, 2018, OPR adopted amendments to the CEQA Guidelines to clarify several points such as cumulative nature of GHG emissions, modeling methodology, and significance evaluation. The administrative record for the CEQA Guidelines amendments also clarifies “that the effects of GHG emissions are cumulative and should be analyzed in the context of California Environmental Quality Act’s requirements for cumulative impact analysis.”⁷⁵

California Air Resources Board

CARB, a part of CalEPA, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. CARB also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California’s State Implementation Plan (SIP), for which it

⁷³ See 14 California Code of Regulations Sections 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

⁷⁴ 14 California Code of Regulations Section 15064.4(b).

⁷⁵ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research (OPR) to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the CAA. CARB also has primary responsibility for adopting regulations to meet the state's goal of reducing GHG emissions to 1990 levels by 2020.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (13 CCR, Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

Low Carbon Fuel Standard

In 2007, Executive Order S-01-07 mandated the following: establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and adopt a LCFS for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. In 2009, the LCFS regulations were approved by CARB and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 beginning in 2011. In 2015, CARB approved the re-adoption of the LCFS, which became effective beginning January 2016, to address procedural deficiencies in the way the original regulation was adopted.

In-Use Off-Road Diesel-Fueled Fleets Regulation

In 2007, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

CARB approved amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation in November of 2022.⁷⁶ The amendment will require fleets to phase-out use of the oldest and highest polluting off-road diesel vehicles, prohibit the addition of high-emitting vehicles to a fleet, and require the use of R99 or R100 renewable diesel in off-road diesel vehicles. The amendments phase-in starting in 2024 through the end of 2046 and include changes to enhance enforceability and encourage the adoption of zero-emission technologies. These amendments aim to further reduce emissions from the off-road sector.

⁷⁶ CARB, 2022c. CARB approves amendments to Off-Road Regulation to further reduce emissions, November 17. <https://ww2.arb.ca.gov/news/carb-approves-amendments-road-regulation-further-reduce-emissions>. Accessed January 2024.

Truck and Bus Regulation

In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)). CARB has also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as, bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation aims to reduce emissions by installation of diesel soot filters, and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

Advanced Clean Cars Program

In 2012, CARB adopted the Advanced Clean Cars (ACC) emissions-control program, which is closely associated with the emissions standards for passenger vehicles and light-duty trucks discussed above.⁷⁷ The program requires an increase in the number of zero-emissions vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. By 2025, ZEVs must be 22 percent of large volume manufacturers overall production.⁷⁸ This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025.

Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, which would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program⁷⁹. The ACC II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. The ACC II regulation amends the Zero-emission Vehicle Regulation to require an increasing number of zero-emission vehicles, and relies on currently available advanced vehicle technologies, including battery-electric, hydrogen fuel cell electric and plug-in hybrid electric-vehicles, to meet air quality and climate change emissions standards which supports Governor

⁷⁷ CARB, 2023b. California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley). <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>. Accessed March 2023.

⁷⁸ CARB, 2023c. Current Zero-Emissions Vehicle Regulation. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/zev-program/current-zero-emission-vehicle-regulation>. Accessed March 2023.

⁷⁹ CARB, 2024a. Advanced Clean Cars II. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii>. Accessed January 2024.

Newsom’s 2020 Executive Order N-79-20 that requires all new passenger vehicles sold in California to be zero emissions by 2035. Additionally, the ACC II regulation amends the Low-emission Vehicle Regulations to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions.

Advanced Clean Trucks Program

The Advanced Clean Trucks regulations were approved on June 25, 2020, and require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. The goal of this proposed strategy is to achieve nitrogen oxide (NOx) and GHG emission reductions through advanced clean technology, and to increase the penetration of the first wave of zero-emissions heavy-duty technology into applications that are well suited to its use. According to CARB, “Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the SIP, Sustainable Freight Action Plan, SB 350, and AB 32.”⁸⁰ The percentage of zero-emissions truck sales is required to increase every year until 2035 when sales would need to be 55 percent of Classes 2b–3 (light/medium- and medium-duty trucks) truck sales, 75 percent of Classes 4–8 (medium- to heavy-duty trucks) straight truck sales, and 40 percent of truck tractor (heavy-duty trucks weighing 33,001 pounds or greater) sales. Additionally, large fleet operators (of 50 or more trucks) would be required to report information about shipments and services and their existing fleet operations.

Land Use and Transportation Planning

In 2008, SB 375 (Chapter 728, Statutes of 2008) established mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the State’s metropolitan planning organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.⁸¹ The proposed reduction targets explicitly exclude emission reductions expected from the AB 1493 and the LCFS regulations.

Under SB 375, the regional GHG reduction target must be incorporated within the applicable MPO’s Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS).

In 2011, CARB adopted GHG emissions reduction targets for the Southern California Association of Governments (SCAG), the MPO for the region in which the city of Culver City is located. In 2018, CARB updated the SB 375 targets to require an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.^{82,83}

⁸⁰ CARB, 2023a. Advanced Clean Trucks Program. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/about>. Accessed March 2023.

⁸¹ CARB, 2023d. Sustainable Communities and Climate Protection Program. <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about>. Accessed March 2023.

⁸² CARB, 2017. California’s 2017 Climate Change Scoping Plan, November.

⁸³ CARB, 2018. SB 375 Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. https://ww2.arb.ca.gov/sites/default/files/2020-06/SB375_Updated_Final_Target_Staff_Report_2018.pdf. Accessed March 2023.

Energy Sector

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods.

The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective January 1, 2023. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.⁸⁴

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, with the most current version being the 2022 version which became effective January 1, 2023. The purpose of the CALGreen Building Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”⁸⁵ The CALGreen Building Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Building Code establishes mandatory measures for new residential and non-residential buildings. The CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The 2022 CALGreen Code: revises standards for electric vehicle charging for new construction, primarily multi-family dwellings and hotels/motels, including increased requirements for EV parking spaces and EVSE Level 2 chargers, establishes heat pumps as a baseline technology, strengthens ventilation standards, establishes electric-ready requirements for new homes, and sets minimum solar photovoltaic and battery energy storage capacity for high-rise multifamily and commercial buildings, including office buildings, grocery stores, and schools, and more.

⁸⁴ California Energy Commission, 2022. Building Energy Efficiency Standards.

⁸⁵ California Building Standards Commission, 2010. California Green Building Standards Code.

The 2012 Appliance Efficiency Regulations (CCR, Title 20, Sections 1601 through 1608) took effect February 13, 2013. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

The State has adopted regulations to increase the proportion of electricity from renewable sources. In 2008, Executive Order S-14-08 expanded the State's RPS goal to 33 percent renewable power by 2020. In 2009, Executive Order S-21-09 directed CARB (under its AB 32 authority) to enact regulations to help the state meet the 2020 goal of 33 percent renewable energy. The 33 percent by 2020 RPS goal was codified with the passage of Senate Bill X1-2. This new RPS applied to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators. SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030, including interim targets of 40 percent by 2024 and 45 percent by 2027. In 2018, SB 100 further increased California's RPS and requires retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by the end of 2024, 52 percent by the end of 2027, and 60 percent by the end of 2030; and requires that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.

Regional

Southern California Association of Governments

In 2020, SCAG adopted the SCAG 2020–2045 RTP/SCS, also known as “Connect SoCal,” which is an update to the previous 2012–2035 RTP/SCS and 2016–2040 RTP/SCS.⁸⁶ Using growth forecasts and economic trends, the 2020–2045 RTP/SCS provides a vision for transportation throughout the region for the next several decades by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2020–2045 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction in per capita transportation GHG emissions by 2020 and a 19 percent reduction in per capita transportation GHG emissions by 2035 compared to the 2005 level on a per capita basis.⁸⁷ Compliance with and implementation of the 2020–2045 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions (e.g., nitrogen dioxide, carbon monoxide, etc.) associated with reduced per capita

⁸⁶ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

⁸⁷ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

VMT. CARB has accepted the SCAG GHG quantification determination in the 2020–2045 RTP/SCS for future GHG emission reduction targets.⁸⁸

The 2020–2045 RTP/SCS states that the SCAG region was home to approximately 18.8 million people in 2016 and included approximately 6.0 million homes and 8.4 million jobs.⁸⁹ By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with approximately 1.6 million more homes and 1.7 million more jobs. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier thanks to an expanded regional charging network.

High-quality transit areas (HQTAs), which are defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 2.4 percent of regional total land, but are projected to accommodate 51 percent and 60 percent of future household growth respectively between 2016 and 2045.⁹⁰ The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. Transit Priority Areas⁹¹ (TPAs) will account for less than one percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s TPAs. TPAs are a cornerstone of land use

⁸⁸ CARB, 2020b. Southern California Association of Governments’ (SCAG) 2020 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, October 2020. <https://ww2.arb.ca.gov/sites/default/files/2021-02/SCAG%202020%20SCS%20CARB%20Acceptance%20of%20GHG%20Quantification%20Determination%20Executive%20Order.pdf>. Accessed January 2024.

⁸⁹ Southern California Association of Governments, 2020b. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Demographics and Growth Forecast Technical Report. September 2020.

⁹⁰ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October, p 51.

⁹¹ Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours.

planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

SCAG's 2020–2045 RTP/SCS provides specific strategies for implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.⁹²

In addition, the 2020–2045 RTP/SCS includes strategies to promote active transportation; support local planning and projects that serve short trips; promote transportation investments, investments in active transportation, more walkable and bikeable communities that will result in improved air quality and public health and reduced GHG emissions; and support building physical infrastructure such as local and regional bikeways, sidewalk and safe routes to schools pedestrian improvements, regional greenways and first-last mile connections to transit, including to light rail and bus stations. The 2020–2045 RTP/SCS aligns active transportation investments with land use and transportation strategies, increases competitiveness of local agencies for federal and state funding, and expands the potential for all people to use active transportation.

Although there are GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020–2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are needed for 2045. By meeting and exceeding the SB 375 targets for 2035, as well as achieving an additional 4.1 percent reduction in GHG from transportation-related sources in the ten years between 2035 and 2045, the 2020–2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's future GHG emission reduction goals.⁹³ Refer to Section 4.10, *Land Use and Planning*, of this PEIR, for further discussion of the RTP/SCS.

South Coast Air Quality Management District

As discussed in Section 4.3, *Air Quality*, of this PEIR, SCAQMD is responsible for air quality planning in the South Coast Air Basin (where the Planning Area is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. As part of its efforts to reduce local air pollution, SCAQMD has promoted a number of programs to combat climate change. For instance, SCAQMD has promoted energy conservation, low-carbon

⁹² Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

⁹³ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

fuel technologies (natural gas vehicles; electric-hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, VMT reduction programs, and market incentive programs.

A GHG Significance Threshold Working Group was formed by the SCAQMD to evaluate potential GHG significance thresholds.⁹⁴ In 2008, the Working Group released draft guidance regarding interim CEQA GHG significance thresholds.^{95,96,97} Within its October 2008 document, the Working Group proposed the use of a percent emission reduction target compared to business as usual to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less-than-significant impact on climate change. In addition, on December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e for stationary source/industrial projects where the SCAQMD is the Lead Agency. However, the SCAQMD has not adopted a GHG significance threshold for land use development projects. The aforementioned Working Group has been inactive since 2011 and the SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

Local

As discussed above in Section 4.7.2, Environmental Setting, Culver City prepared the 2019 Community GHG Inventory Report, which shows the types, distribution, and amount of GHG emissions from using electrical and natural gas, transportation, solid waste, off-road equipment, industrial sources, water supply, and wastewater treatment within Culver city by residents, businesses, and local government operations. In 2019, Culver City emitted 291,922 MTCO₂e from all sources.⁹⁸ The report does not include any GHG reduction measures or goals.

Culver City General Plan

The Circulation Element provides an overview of regulatory policies, transportation agencies, and local conditions; presents a vision for mobility in the Culver City area; presents a Street System Classification; discusses the Culver CityBus system; presents Bikeway Classifications; and provides goals, objectives, and policies to improve the local and regional transportation system. Culver City has also adopted the concept of Complete Streets, which emphasizes a balanced transportation system that considers all users of the road (cyclists, pedestrians, transit riders,

⁹⁴ South Coast Air Quality Management District, 2023. Greenhouse Gases CEQA Significance Thresholds. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed March 2023.

⁹⁵ South Coast Air Quality Management District, 2008a. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Attachment E. October 2008.

⁹⁶ South Coast Air Quality Management District, 2008b. Board Meeting, December 5, 2008, Agenda No. 31. <http://www3.aqmd.gov/hb/2008/December/0812ag.html>. Accessed March 2023.

⁹⁷ South Coast Air Quality Management District, 2008c. Greenhouse Gases, CEQA Significance Thresholds, Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. December 5, 2008.

⁹⁸ Culver City, 2021. 2019 Community Greenhouse Gas Inventory Report, April. https://9021zeroemissions.rinconconsultants.com/wp-content/uploads/2021/11/2.-CulverCity_2019_Community_GHG_Inventory_Clean.pdf. Accessed January 2024.

and vehicles) while planning development and transportation projects.⁹⁹ The goal of this concept is to transform Culver City into a place with an extensive bicycle and pedestrian network that allows travelers of all levels and abilities to feel comfortable walking and biking to their destinations.¹⁰⁰

Culver City Green Building Ordinance and Program

Culver City has adopted green building ordinances to reduce GHG emissions for new development. Culver City has adopted a Photovoltaic Requirement that requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet (sf) of new development or payment of an in-lieu fee.¹⁰¹ Any new development projects under the General Plan and Zoning Code Update would comply with Culver City Municipal Code (CCMC) Chapter 15.02.105 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code.

In 2009, Culver City adopted the Green Building Program that requires new developments totaling more than 50,000 sf to achieve Leadership in Energy and Environmental Design (LEED) equivalent certification.¹⁰² An example of Culver City's Green Building Program requirements is that all lighting has to be either fluorescent, LED or other type of high-efficiency lighting. Any new development projects under the General Plan and Zoning Code Update would have to meet or exceed the applicable requirements of Culver City's Green Building Program.

Culver City's Electric Vehicle (EV) Infrastructure Plan

The Culver City EV Infrastructure Plan was developed as a result of Culver City's participation as one of 18 cities in the SCAG 2020 charging station study where SCAG assisted in developing a citywide EV infrastructure plan.¹⁰³ As noted in the City's EV Infrastructure Plan, depending on the mix of EV charging station types, Culver City may need between 380 and 1,154 charging stations by 2030 to support statewide goals. The EV Infrastructure Plan aims to assist Culver City to expand its EV charging network as it determines the most suitable sites in Culver City to install EV charging stations and identifies hurdles to installing EV charging stations and develop solutions. Culver's City's EV Infrastructure Plan also highlights that while the City will increase EV charging stations at publicly owned locations, the majority of EV charging stations will be owned and operated by the private sector. The City with assistance from the City's EV Infrastructure Plan looks to foster private EV development by increasing education and awareness about EVs and EV charging stations; create policies and initiatives that encourage and streamline EV

⁹⁹ Culver City, 2020. Bicycle and Pedestrian Master Plan. Adopted by City Council, June. <https://www.culvercity.org/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf>. Accessed January 2024.

¹⁰⁰ Culver City, 2020. Bicycle and Pedestrian Master Plan. Adopted by City Council, June. <https://www.culvercity.org/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf>. Accessed January 2024.

¹⁰¹ Culver City Municipal Code. Section 15.02.105, Solar Photovoltaic Systems.

¹⁰² Culver City Municipal Code. Chapter 15.02.1100, Green Building Program and Requirements.

¹⁰³ SCAG, 2023. SCAG EV Charging Station Study- Electric Vehicle (EV) Infrastructure Plan – Culver City, February 28. <https://www.culvercity.org/files/assets/public/v/1/documents/public-works/sustainability/2023-02-cc-scag-ev-studyplan-package-final.pdf>. Accessed January 2024.

charging stations development, installation, and use; and connect EV and EV charging stations stakeholders to funding resources to reduce upfront costs.¹⁰⁴

Culver City Bicycle & Pedestrian Action Plan

The City of Culver City updated the Bicycle and Pedestrian Master Plan with the Bicycle and Pedestrian Action Plan (Action Plan), which received public input throughout 2017 through 2019. The Action Plan was adopted by Culver City Council in June 2020.¹⁰⁵ The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network.

Culver City Clean Power Alliance

Clean Power Alliance (CPA) became the new electricity supplier for Culver City in February 2019 for residential customers and in May 2019 for non-residential customers. With this change, CPA purchases the renewable energy resources for electricity, and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA and remain with SCE as their provider.

4.7.4 Project Impact Analysis

Thresholds of Significance and Methodology

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

- Threshold GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Threshold GHG-2:** Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4 assists lead agencies in determining the significance of the impacts of GHG emissions, and gives them discretion to determine whether to assess emissions quantitatively or qualitatively. If a qualitative and quantification-based approach is used, then Section 15064.4 recommends qualitative factors that may be used in the determination of significance. These factors include the extent to which the project may increase or reduce GHG

¹⁰⁴ SCAG, 2023. SCAG EV Charging Station Study- Electric Vehicle (EV) Infrastructure Plan – Culver City, February 28. <https://www.culvercity.org/files/assets/public/v/1/documents/public-works/sustainability/2023-02-cc-scag-ev-studyplan-package-final.pdf>. Accessed January 2024.

¹⁰⁵ Culver City, 2020. Bicycle and Pedestrian Master Plan. Adopted by City Council, June. <https://www.culvercity.org/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf>. Accessed January 2024.

emissions compared to the existing environment, whether the project exceeds an applicable significance threshold, and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. CEQA Guidelines Section 15064.4 does not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including by looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association, so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]). The California Natural Resources Agency also has clarified that the CEQA Guidelines focus on the impacts of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see also CEQA Guidelines Section 15064[h]).¹⁰⁶

Although GHG emissions can be quantified, CARB, SCAQMD, and Culver City have not adopted quantitative project-level significance thresholds for GHG emissions that apply to the Project. In 2008, OPR released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that “lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice,” and that while “climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment”.¹⁰⁷ Furthermore, the technical advisory states that “CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project”.¹⁰⁸

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency (CCR, Title 14, Section 15064(h)(3)). Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions” (CCR, Title 14, Section 15064(h)(3)).

Even in the absence of clearly defined thresholds for GHG emissions, the law requires that an agency makes a good faith effort to disclose the GHG emissions from a project and mitigate to the extent feasible whenever the lead agency determines that a project contributes to a significant, cumulative climate change impact. Regardless of which threshold(s) are used, the agency must support its analysis and significance determination with substantial evidence (CEQA Guidelines, Section 15064.7). The CEQA Guidelines recommends considering certain

¹⁰⁶ See generally CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16; see also Letter from Cynthia Bryant, Director of the OPR to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

¹⁰⁷ Governor's OPR, 2008. Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 19. <https://opr.ca.gov/ceqa/docs/20210720-june08-ceqa.pdf>. Accessed January 2024.

¹⁰⁸ Governor's OPR, 2008. Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 19. <https://opr.ca.gov/ceqa/docs/20210720-june08-ceqa.pdf>. Accessed January 2024.

factors, among others, when determining the significance of a project's GHG emissions, including the extent to which a project may increase or reduce GHG emissions as compared to the existing environment; whether a project exceeds an applicable significance threshold; and extent to which a project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."¹⁰⁹ Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that a single project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change.

Section 15064.4(b) of the CEQA Guidelines states that "in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonable, foreseeable incremental contribution of a project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions."

The Project consists of planning documents, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions. Future GHG emissions may result from new developments that could occur from adoption of the proposed General Plan and Zoning Code Updates. This assessment quantifies GHG emissions from such new development under buildout conditions of the proposed General Plan and Zoning Code Update. Although GHG emissions have been quantified as discussed under the Methodology and Assumptions subsection below, neither CARB, SCAQMD, nor Culver City has adopted quantitative significance thresholds. In the absence of any adopted quantitative threshold, the determination of whether or not new development that could occur from adoption of the Project would result in a cumulatively considerable contribution to the cumulative impacts of global climate change is based on the following:

- If the Project would conflict with (and thereby be inconsistent with) the applicable GHG emissions reduction plans, policies, and regulations, which include the emissions reduction measures included within CARB's 2022 Scoping Plan; SCAG's 2020–2045 RTP/SCS; and Culver City's plans, programs, and policies including Culver City's Green Building Program established for the purpose of increasing energy efficiency and reducing GHG emissions for new developments under the Project.

Greenhouse Gas Emissions

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions. The GHG emissions provided in this report are

¹⁰⁹ California Air Pollution Control Officers Association (CAPCOA), 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act..

consistent with the General Reporting Protocol framework. For the purposes of this PEIR, estimated GHG emissions from the operation of new development that could occur with adoption of the proposed General Plan and Zoning Code Update are quantified to provide information to decision makers and the public regarding the level of the GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel)
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.¹¹⁰

Direct GHG emissions from new development would result from natural gas combustion and landscaping equipment, and indirectly from electricity demand, water conveyance, wastewater generation, solid waste decomposition, and motor vehicles. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

The quantification of GHGs from any project involves many uncertainties. For example, it is reasonable to assume that some portion of the residents, employees, and visitors that would occupy new development that would occur under the proposed General Plan and Zoning Code Update would engage in similar activities (working, recreating, and driving) that generate GHG emissions without adoption of the proposed General Plan and Zoning Code Update. However, adoption of the proposed General Plan and Zoning Code Update could result in changing travel behavior that reduces vehicle miles traveled. Additionally, newer construction materials and practices, future energy efficiency requirements, future mobile source emission standards, and advances in technology would likely reduce future levels of emissions. However, the net effect is difficult to quantify due to the difficulty in predicting future behaviors of residents, employees, and visitors and future standards and requirements. As such, the estimated net change in emissions that could result from new development under the Project is likely to be an overestimation. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for quantifying GHG emissions. Additional details regarding emissions quantification are provided below.

Construction Emissions

Construction of new development that could occur as a result of the General Plan and Zoning Code Updates would have the potential to increase GHG emissions through the use of heavy-duty construction equipment, such as excavators, cranes, and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from project sites. The Project is a planning-level document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Therefore, quantification of GHG emissions associated

¹¹⁰ Embodied energy includes energy required for water pumping and treatment for end-uses.

with future development under the Project cannot be specifically determined at this time. Therefore, the analysis will be based on the potential for construction to conflict with applicable plans, policies, and regulations to reduce GHG emissions in the context of overall development GHG emissions.

Operational Emissions

Operation of new development that could occur as a result of the Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. GHG emissions would also be generated by vehicle trips, electricity demand, water demand, wastewater generation, and solid waste decomposition. Operational impacts were assessed for the full Project buildout year of 2045.

VMT data, which takes into account mode and trip lengths, was developed for the transportation analysis. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor vehicle fleet mix for the region based on the CARB EMFAC2021 model and default fuel type. EMFAC2021 was used to generate emissions factors for operational mobile sources based on fuel type and vehicle class. However, traffic reduction policies within the General Plan Circulation element, to which the regional travel demand model may not be fully sensitive (such as connectivity in neighborhoods, presence of bicycle and pedestrian facilities, and transportation demand management measures), may not be fully reflected in the VMT and emissions estimates. Therefore, estimated mobile source emissions are conservatively higher.

Emissions of GHGs from buildout of new development that could occur under the Project are estimated using CalEEMod, which is a statewide land use emission computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California and is recommended by the SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying GHG emissions from land use development throughout California. For new development, CalEEMod default values were used for area source emissions except that wood stoves and wood fireplaces were removed from the emissions calculations as they are not permitted within SCAQMD's jurisdiction for most new commercial and residential development per SCAQMD Rule 445 and no fireplaces are permitted in multi-family residential units. Future development is assumed to comply with the Title 24 (2022) building energy efficiency standards, which is a conservative assumption since future Title 24 standards, typically adopted every three years, would reduce building energy demand for future development permitted in 2026 and later.

Emissions of GHG from water and wastewater are due to the required energy to supply, distribute and treat. Wastewater also results in emissions of GHGs from wastewater treatment systems. For new development, CalEEMod default water and wastewater related GHG emissions

are assumed in the analysis. A municipal solid waste diversion rate of 75 percent is assumed in compliance with AB341 (refer to Section 3.18, Utilities and Service Systems, of this PEIR, for additional information regarding AB 341). For solid waste, the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment.

In 2019, Culver City automatically enrolled all residential and commercial users to receive electricity from the Clean Power Alliance (CPA). The CPA buys electricity from renewable sources and partners with Southern California Edison to distribute electricity to residential and commercial customers throughout the city. Culver City has chosen 100 percent Green Power as a step to reaching carbon neutrality and all customers are defaulted to receive electricity from 100 percent renewable resources. However, as customers have the ability to choose lower renewable energy percentages or to opt out of the CPA, the analysis conservatively assumes that the renewable usage is equal to that of SCE's renewable production via compliance with the state's Renewables Portfolio Standard (which requires local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by 2027, 60 percent by 2030, and 100 percent by 2045).

Other sources of GHG emissions from operation of developments that could occur under the General Plan and Zoning Code Update include equipment used to maintain landscaping, such as lawnmowers and trimmers. CalEEMod default emission rates were used in calculating GHG emissions from these additional sources. The emissions for landscaping equipment are based on the size of the open space based on the Project's residential and retail land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted. Refrigerant emissions are based on Project land use type since different types of refrigeration equipment are used by different types of land uses. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing of the refrigeration equipment lifetime, and then derives average annual emissions from the lifetime estimate.

Comparative Net Emissions

As discussed above in Section 4.7.2, Environmental Setting, Culver City prepared the 2019 Community GHG Inventory Report, which is a detailed analysis of year 2019 GHG emissions from the use of electrical and natural gas, transportation, solid waste, off-road equipment, industrial sources, water supply, and wastewater treatment within the city by residents, businesses, and local government operations. A similarly detailed analysis of year 2045 GHG emissions with future buildout of the Project is not possible because data with respect to the exact types of future uses that would be developed, future use activity levels (i.e., utility consumption, trip generation), and building energy standards for each residential or business use is not known at this time. Adoption of the General Plan and Zoning Code Update would not result in the approval of any specific development. Therefore, emissions estimates for future year 2045 GHG emissions with future buildout of the Project are based on default parameters in CalEEMod, version 2022.1, and modifications to default parameters as discussed above. Additionally, as described above, GHG reductions that would likely occur in the future, such as renewable energy from the CPA and increased EV vehicles pursuant to the ACC II Program or future EV programs, are not accounted for in the modeling. Thus, in order to compare the future year

2045 GHG emissions with future buildout of the Project to existing GHG emissions and provide a like-for-like comparison using a similarly conservative and generalized methodology, the existing emissions have been reassessed also using default parameters in CalEEMod, version 2022.1 in 2019, with modifications to default parameters, such as assuming no wood stoves and CalEEMod default usage for fireplaces and assuming a municipal solid waste diversion rate of 50 percent in compliance with AB 939 and SB 1016. Thus, for the purposes of this comparative assessment, year 2045 GHG emissions with future buildout of the Project are conservatively overestimated, as are the reassessed year 2019 existing development GHG emissions.

Consistency with GHG Reduction Plan, Policies, and Actions

The Project's potential for GHG impacts is also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by CARB, SCAG, and the City. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on whether the Project is not in conflict with, and therefore is consistent with, Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment consistent with CEQA Guidelines Section 15064.4 and CEQA Guidelines Appendix G. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.¹¹¹

A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB's 2022 Scoping Plan, the 2020-2045 RTP/SCS and the City's Green Building Program.

For this Project, the City of Culver City serves as the lead agency. OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Culver City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the CEQA Guidelines. However, Culver City has adopted the Green Building Program that encourages and requires applicable projects to implement energy efficiency measures. In addition, the California CAT Report provided recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in HSC Division 25.5. Thus, if the Project incorporates policies and regulations that would not conflict with the above emission reduction strategies for reducing GHG, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reductions.

¹¹¹ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency’s use of existing environmental standards in determining the significance of a project’s environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”]. Lead agencies can, and often do, use regulatory agencies’ performance standards. A project’s compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes “recommendations intended to build momentum for local government actions that align with the State’s climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA).”¹¹²

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State’s climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. “By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.”¹¹³

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the need for housing while demonstrating that a Project is in alignment with the State’s Climate Goals.¹¹⁴ The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State’s climate goals, like infill development, low-income housing or solar arrays, is not consistent with the State’s goals. The State also recognizes the lead agencies’ discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Project Impact Analysis

Generate GHG Emissions

Threshold GHG-1: The Project would have a significant impact if future development allowed by the 2045 General Plan would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

¹¹² CARB, 2022b. 2022 Scoping Plan for Achieving Carbon Neutrality – Appendix D: Local Actions, November.

¹¹³ CARB, 2022b. 2022 Scoping Plan for Achieving Carbon Neutrality – Appendix D: Local Actions, November.

¹¹⁴ The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

Impact Statement GHG-1: The Project would result in a less than significant impact related to GHG emissions.

Construction

As stated above, the Project consists of planning documents, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions. Future GHG emissions may result from new development that would occur from adoption of the General Plan and Zoning Code Updates. Construction of future new development has the potential to generate GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. Construction emissions can vary substantially from day to day, depending on the level of activity and the specific type and amount of equipment. However, as there are no specific projects currently proposed under the Project and there is no knowledge as to timing of construction, location or the exact nature of future projects, analysis of construction emissions would be speculative. Information regarding development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible at this time.

All future projects developed under the General Plan 2045 would be required to comply with applicable USEPA, CARB and SCAQMD emissions standards, rules, and regulations. In addition, applicable CEQA analysis, as required, would determine significance based on the individual project specifics. Furthermore, future construction activities under the General Plan 2045 would be required to comply with the CARB Air Toxics Control Measure, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location (13 CCR, Section 2485), CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, SAFE Vehicle Rule (or its successor rule), and CARB Advanced Clean Car and Advanced Clean Trucks regulations, all of which support the goals of the CARB Climate Change Scoping Plan by requiring construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road vehicle and truck technologies as they become developed and commercially available. Mandatory compliance with these rules and regulations would reduce GHG emissions, including fuel combustion emissions of CO₂, CH₄, and N₂O, during future construction activities under the General Plan 2045.

Operation

Operation of future development under the General Plan 2045 would generate emissions of GHG emissions from vehicle trips traveling within the city, energy sources such as electricity demand and natural gas combustion, area sources such as fireplaces and landscaping equipment, water conveyance and distribution, wastewater treatment, and solid waste decomposition. Projected emissions resulting from operational activities of both existing and future development resulting from the General Plan 2045 are presented in **Table 4.7-7, Unmitigated Annual Greenhouse Gas Emissions.**

**TABLE 4.7-7
 UNMITIGATED ANNUAL GREENHOUSE GAS EMISSIONS**

Emissions Sources	CO₂e (Metric Tons per Year) ^{a,b}
Existing Development plus New Development (2045)	
Mobile (Based on 2045 with GPU VMT)	227,221
Area (Fireplaces, Landscaping)	5,562
Energy (Electricity) ^c	148,803
Solid Waste	17,291
Water and Wastewater	6,984
Refrigerants	162
Annual Emissions	406,023
Existing Development (2019)^d	524,285
Comparative Net Change	(118,262)

- ^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E.
- ^b CO₂e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report.
- ^c Consistent with Senate Bill 1020, the proposed General Plan buildout would use 100 percent renewable electricity by 2045. In addition, the General Plan buildout would not include any natural gas infrastructure.
- ^d These GHG emissions are different from those presented in the Culver City 2019 Community GHG Inventory Report. In order to compare the future year 2045 GHG emissions with future buildout of the Project to existing GHG emissions and provide a like-for-like comparison using a similarly conservative and generalized methodology, the existing emissions have been reassessed using default parameters in CalEEMod, version 2022.1 in 2019, with modifications to default parameters, such as assuming no wood stoves and CalEEMod default usage for fireplaces and assuming a municipal solid waste diversion rate of 50 percent in compliance with AB 939 and SB 1016. Thus, for the purposes of this comparative assessment, year 2045 GHG emissions with future buildout of the Project are conservatively overestimated, as are the reassessed year 2019 existing development GHG emissions.

SOURCE: ESA, 2024.

As shown in Table 4.7-7, applying consistent GHG emissions modeling methodologies, the net change in operational emissions from existing development (2019) compared to existing plus buildout under the General Plan Update at 2045 would be negative primarily due to the focus of the General Plan 2045 on infill development and development along transportation corridors to achieve an integrated land use mix that would accommodate growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. Development of future residential and nonresidential uses would be based on market demand and would be constructed over the buildout through 2045.

The proposed General Plan policies, listed below, would reduce potential emissions from future new, as well as existing, development. As required by SB 1000, the Community Health and Environmental Justice Element identifies SB 1000 Priority Neighborhoods (refer to Section 4.2, *Air Quality*, for additional information on SB 1000). The Community Health and Environmental Justice Element includes several policies relevant to reducing GHG emissions and sustainability. In addition, as applicable, applicants for future development under the General Plan 2045 requiring discretionary approval would conduct CEQA analysis to determine significance based on the individual project specifics. Through each project’s environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual

projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable GHG emissions control strategies and regulations as discussed above. As shown in Table 4.7-7, applying consistent GHG emissions modeling methodologies, the net change in operational emissions from existing development (2019) to existing plus buildout at 2045 would be negative compared to existing (2019) development primarily due to the focus of the proposed General Plan 2045 on infill development and development along transportation corridors to achieve an integrated land use mix that accommodates growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. Since the Zoning Code Update would provide the development standards to implement the General Plan 2045, and would be consistent with the General Plan 2045, the Zoning Code Update would result in a less than significant impact.

Applicable Proposed General Plan Goals and Policies

Community Health and Environmental Justice Element

Goal CHEJ-2: Exposure to Pollutants. All Culver City occupants and visitors enjoy clean air, water, and soil within residential and commercial neighborhoods, work and education centers, and recreational facilities.

CHEJ-2.3: Mobile source pollution. Reduce air pollution and vehicle-related emissions, especially from diesel-based trucks, that travel in Culver City.

CHEJ-2.5: Regional partnerships to eliminate vehicle emissions. Partner with local jurisdictions and agencies, such as the City of Los Angeles's Transportation Electrification Partnership, to develop plans and advance strategies that foster the transition of the transportation sector from fossil-fueled powered vehicles to zero emission vehicles such as battery-electric or hydrogen fuel-cell electric.

CHEJ-2.9: Climate justice. Ensure SB 1000 Priority Neighborhoods are considered in all future programs related to sustainable development, greenhouse gas mitigation, and climate adaptation.

Greenhouse Gas Reduction Element

Goal GHG-1: Carbon Neutrality. A carbon neutral community by 2045 in line with or exceeding State targets.

GHG-1.1: GHG inventory. Update the community and municipal GHG inventories every five years to track progress toward achieving the City's GHG reduction goal.

GHG-1.2: Reduction measures. Maintain and regularly update GHG reduction measures in the General Plan to reduce GHG emissions generated within the city. Formalize and make necessary changes to the City's climate action strategy based on results of the five-year GHG inventory updates to achieve the City's GHG reduction goals.

GHG-1.3: New technologies. Regularly evaluate new and emerging technology changes that can help to reduce GHG emissions and encourage using technology that is demonstrated to be effective at reducing GHG emissions in a fiscally responsible manner.

GHG-1.4: Funding sources. Seek additional funding sources to support implementing GHG reduction projects for the City, residents, and businesses.

GHG-1.5: Support GHG reduction. Initiate or support legislation and regulations that are designed to establish achievable targets and to fund programs that ensure that all cities can achieve their GHG reduction goals.

Goal GHG-2: Green buildings. Green and decarbonized buildings are the standard for new construction, major renovations, and existing building retrofits.

GHG-2.1: Clean power access. Maintain access for residents and businesses to carbon-free and renewable energy sources through the Clean Power Alliance and partnerships with Southern California Edison.

GHG-2.2: All electric buildings. Foster a transition to all-electric buildings.

GHG-2.3: Water efficiency. Encourage implementation of both residential and nonresidential voluntary measures of the California Green Building Standards Code (CALGreen) to reduce or eliminate potable water use outdoors.

GHG-2.4: Energy and water efficiency. Improve the energy and water efficiency of new and existing buildings.

GHG-2.5: Productive Roofs. Maintain and distribute guidelines for solar generation or green roofs on available roof space in new developments and major renovations, in alignment with City solar photovoltaic requirements. Encourage the use of green and/or cool roofs in new construction.

GHG-2.6: Passive heating and cooling. Encourage and ensure dissemination of resources for solar energy generation and passive heating and cooling strategies.

GHG-2.7: Efficiency outreach. Educate residents and businesses on available incentive and rebate opportunities to reduce energy and water use.

Goal GHG-3: Municipal buildings and facilities. The environmental efficiencies and performance of municipal buildings, facilities, landscaping, and parks in Culver City is improved.

GHG-3.1: Green rating system. Encourage all new municipal buildings and facilities to meet a minimum LEED silver rating as certified by the US Green Building Council or equivalent green building rating system. Consider feasibility studies for zero net energy use via on-site renewable energy generation and on-site battery storage.

GHG-3.2: Benchmarking. Regularly benchmark the environmental performance of municipal buildings, landscaping, parks, and facilities.

GHG-3.3: Energy efficiency improvements. To reduce operating and maintenance costs, use benchmarking data to identify opportunities for environmental performance improvements through equipment replacements, audits, retro-commissioning, and building retrofits.

GHG-3.4: Waste diversion. Encourage municipal construction projects to achieve 75 percent waste diversion from the landfill.

GHG-3.5: Battery storage. Encourage municipal building and new facility construction and major renovation projects to evaluate the feasibility of incorporating onsite batteries that store electricity from onsite renewable energy generation to supply the building and community with electricity in the event of a disaster.

Goal GHG-4: Decarbonized transportation sector. GHG emissions from the transportation sector are eliminated.

GHG-4.1: Zero emission vehicles. Enable the shift to zero emission vehicles.

GHG-4.2: Public electric vehicle (EV) chargers. Install additional EV chargers at suitable public facilities and curbside, including Downtown parking structures, community parks, and mobility hubs.

GHG-4.3: Multi-unit residential dwelling EV chargers. Develop policies, and incentive/rebate programs designed to encourage installation of additional EV chargers in mixed-use dwellings, single-family homes, workplaces, and shopping centers.

GHG-4.4: Zero-emission vehicle fleet purchases. When buying new City vehicles, purchase zero emission vehicles when feasible.

GHG-4.5: Zero emission fuels. Transitioning existing vehicles and construction and maintenance equipment to zero emission fuels.

Goal GHG-5: Zero Waste. Increase resource capture and decrease waste sent to landfills.

GHG-5.1: Zero waste. Achieve zero waste through adoption of circular economy principles such as recovery, reuse, and sharing of resources.

GHG-5.2: Extended producer responsibility. Support producer responsibility policies that place a shared responsibility for end-of-life product management on producers, instead of the general public, while encouraging product design changes that minimize negative impacts on human health and the environment.

GHG-5.3: Zero waste textile program. Explore establishing a zero-waste textile initiative and collection system.

Goal GHG-6: Sustainability. A city that is aware of its ecology and environmental past and present.

GHG-6.1: Sustainability in City decision-making. Integrate environmental and sustainability outcomes and issues into City decision-making processes, operations, and community activities.

GHG-6.2: Sustainability education. Coordinate with the Culver City Unified School District (CCUSD) to integrate environmental literacy into their student curriculum and in City-sponsored programs or events.

Conservation Element

Goal C-2: Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

C-2.3: Vegetation at parks and open spaces. Manage vegetation at parks and open spaces in Culver City to support biodiversity by reducing pesticide use and reducing use of non-native species.

C-2.4: Tree planting. Plant and maintain trees to sequester carbon, reduce urban heat, provide habitat, and contribute to the city's character.

C-2.6: Native vegetation in open space areas. Use native vegetation and maintain standards and guidelines to protect plant and wildlife species from new development near Kenneth Hahn State Recreational Area, the IOF, Baldwin Hills, and other remaining open space areas.

Goal C-6: Ballona Creek. Ballona Creek is transformed such that it mitigates flooding, restores native ecologies, and becomes a scenic multi-purpose open space and recreational corridor.

C-6.5: Climate change and Ballona Creek. Account for climate change and apply current accepted models in planning for and assessing flood risk along the Ballona Creek corridor.

C-6.10: Trees and landscaping along Ballona Creek. Expand tree planting along Ballona Creek to sequester carbon, adapt to climate change, and provide habitat for wildlife. Encourage concentrated planting of trees and landscaping along areas of the creek corridor that will upgrade visual quality from prominent vantage points along public streets, and from parks and other public gathering areas.

C-6.12: Sustainable planting along Ballona Creek. Establish Ballona Creek as a sustainable scenic recreational and open space corridor by planting native trees and other compatible landscaping.

Safety Element

Goal S-1: Community resilience. The City proactively advances community resilience and is prepared for all hazards, including climate disruption.

S-1.8: Coordinate with regional and State agencies. Coordinate with regional and State agencies to monitor potential changes in severity, frequency, and affected areas from future emergency situations, especially due to climate change.

S-1.9: Municipal climate preparedness planning and assessment. Implement climate preparedness planning across City departments, programs, and operations.

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.6: Firefighting capability. Strengthen the City firefighting capability to respond to multiple fire incidents caused by an earthquake, Santa Ana winds, climate change, or other extraordinary circumstances.

Goal S-10: Heat and air quality. A City prepared for the combined impacts of extreme heat and poor air quality.

S-10.1: Resilient building design. Support resilient building design by helping residents weatherize homes to keep them cooler/warmer and more energy efficient and to improve indoor air quality.

S-10.2: Heat island impacts. Reduce the heat island effect¹¹⁵ by implementing a variety of adaptation solutions.

S-10.3: Cooling and warming centers. Review, update, and maintain facilities that can be used for refuge during excessive heat and cold days.

S-10.4: Coordinated transportation system. Promote a transportation system coordinated with air quality improvements.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Conflict with GHG Reduction Plan, Policy, or Regulation

Threshold GHG-2: The Project would have a significant impact if future development allowed by the 2045 General Plan would conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Impact Statement GHG-2: The Project would result in a less than significant impact related to conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

In the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted for the purpose of reducing the emissions of GHGs.

The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included within the 2022 Scoping Plan, SCAG's 2020–2045 RTP/SCS, and the City of Culver City's Green Building Program.

¹¹⁵ The heat island effect refers to urban areas with higher temperatures compared to natural landscapes. These high temperatures result from the infrastructure and materials used in urban areas that absorb and re-emit the sun's heat more than natural landscapes. Heat islands can impact human health, the environment, economy, and other issues.

2022 Scoping Plan

The 2022 Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms, such as the Cap-and-Trade program. The 2022 Scoping Plan builds off of a wide array of regulatory requirements that have been promulgated to reduce Statewide GHG emissions, particularly from energy demand and mobile sources. While these regulatory requirements are not targeted at specific land use development projects, they would indirectly reduce a development project's GHG emissions.

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial). This category of regulations can be grouped in terms of the GHG sector that benefit from their implementation. As discussed below, with regard to the energy sector, implementation of the California RPS program and SB 100 and SB 350, would reduce GHG emissions generated by energy consumption. With regard to the mobile sector, implementation of the Advanced Clean Cars Program, LCFS, and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. With regard to the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Further, Project development would occur in accordance with these regulations and, therefore, would comply with their requirements and would not conflict with the implementation of these regulations.

In addition, as explained above, the CARB 2022 Scoping Plan expands on prior Scoping Plans and recent legislations, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier.¹¹⁶ To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes, reduction of short-lived climate pollutants, and mechanical carbon dioxide capture and sequestration actions.

Table 4.7-8, *Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of the GHG-reducing strategies from the 2022 Scoping Plan. The analysis describes the General Plan 2045's compliance and consistency with these strategies outlined in the State's Scoping Plan to reduce GHG emissions. As discussed below, the General Plan 2045 would not conflict with applicable 2022 Scoping Plan strategies and regulations to reduce GHG emissions.

¹¹⁶ CARB, 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality, December.

**TABLE 4.7-8
 CONSISTENCY WITH APPLICABLE SCOPING PLAN
 GREENHOUSE GAS REDUCTION STRATEGIES**

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Transportation Technology Sector		
<ul style="list-style-type: none"> • Achieve 100 percent ZEV sales of light duty vehicles by 2035 and medium heavy-duty vehicles by 2040. • Achieve 20 percent zero-emission target for the aviation sector. • Develop a rapid and robust network of ZEV refueling infrastructure to support needed transition to ZEVs. • Ensure that the transition of ZEV technology is affordable for low income households and communities of color, and meets the needs of communities and small business. • Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions. • Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity and hydrogen station grants from the CEC's Clean Transportation Program pursuant to Executive Order B-48-18. • Evaluate and continue to offer incentives similar to those through FARMER, Carl Moyer, the Clean Fuel Reward Program, the Community Air Protection Program, the Low Carbon Transportation, including CORE. Where feasible, prioritize and increase funding for clean transportation equity programs. • Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Vehicles must transition to zero emission technology to decarbonize the transportation sector. Executive Order N-79-20 reflects the urgency of transitioning to zero emission vehicles (ZEVs) by establishing target dates for reaching 100 percent ZEV sales or fleet transitions to ZEV technology. EO N-79-20 calls for 100 percent ZEV sales of new light-duty vehicles by 2035. The Advanced Clean Cars II regulation fulfills this goal and serves as the primary mechanism to help deploy ZEVs. A number of existing incentive programs also support this transition, including the Clean Cars 4 All Program. EO N-79-20 also sets targets for transitioning the medium- and heavy-duty fleet to zero emissions by 2035 for drayage trucks and by 2045 for buses and heavy-duty long-haul trucks where feasible. Replacing heavy-duty vehicles with ZEV technology will significantly reduce GHG emissions and diesel PM emissions in low-income communities and communities of color adjacent to ports, distribution centers, and highways. The existing Advanced Clean Trucks regulation, paired with the Advanced Clean Fleets regulation, are designed to transition a significant amount of the Off-road vehicles rely heavily on ICE technology and EO N-79-20 sets an off-road equipment target of transitioning the entire fleet to ZEV technology by 2035, where feasible. There are a number of funding sources available to support this transition, including FARMER, Carl Moyer, and Community Air Protection Incentives; as well as Low Carbon Transportation Incentives, including the Clean Off-Road Equipment (CORE) program.</p> <p>Refueling infrastructure is a crucial component of transforming transportation technology. Electric vehicle chargers and hydrogen refueling stations must become easily accessible for all drivers to support a wholesale transition to ZEV technology. Deployment of ZEV refueling infrastructure is currently supported by a number of existing local and state public funding mechanisms.</p> <p>Intrastate aviation relies on ICE technology today, but battery-electric and hydrogen fuel cell aviation applications are in development, along with sustainable aviation fuel.</p> <p>While these actions and strategies apply to state and local agencies and do not directly apply to land use development planning projects, the standards would apply to all vehicles purchased or used by occupants, vendors, and visitors of Culver City. Future development facilitated by adoption of the General Plan 2045 would be required to comply with the CCMC and CALGreen requirements regarding the number of electric vehicle-ready and electric vehicle-capable parking spaces to support ZEVs and PHEVs. As such, the General Plan 2045 would not conflict with implementation of this strategy.</p> <p>As with the LDV sector, a number of incentive programs support this transition, such as the Hybrid and Zero-Emission Truck and Bus Voucher Incentive</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Transportation Fuels Sector		
<ul style="list-style-type: none"> • Accelerate the reduction and replacement of fossil fuel production and consumption in California. • Incentivize private investment in new zero-carbon fuel production in California. • Incentivize the transition of existing fuel production and distribution assets to support deployment of low- and zero-carbon fuels while protecting public health and the environment. • Invest in the infrastructure to support reliable refueling for transportation such as electricity and hydrogen refueling. • Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. <ul style="list-style-type: none"> ○ Initiate a public process focused on options to increase the stringency and scope of the LCFS: ○ Evaluate and propose accelerated carbon intensity targets pre-2030 for LCFS. ○ Evaluate and propose further declines in LCFS post-2030 carbon intensity targets to align with this 2022 Scoping Plan. ○ Consider integrating opt-in sectors into the program. ○ Provide capacity credits for hydrogen and electricity for heavy-duty fueling. • Monitor for and ensure that raw materials used to produce low-carbon fuels or technologies do not result in unintended consequences. 	<p>State agencies and local agencies</p>	<p>Project (HVIP) with implementation of standards under the Advanced Clean Cars II Program, Advanced Clean Fleet Regulation, and HVIP consistent with reduction of GHG emissions under AB 1279. GHG emissions generated by passenger, truck, and bus vehicular travel as a result of future development under the General Plan 2045 would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation. Additionally, the General Plan 2045 has a goal of decarbonizing the transportation sector by shifting to ZEV; providing EV chargers at public facilities; encouraging installation of EV chargers in multi-unit residential and mixed-use dwellings, single-family homes, workplaces, and shopping centers; purchasing only new EV vehicles for the City's fleet; and transitioning existing fleet vehicles and construction and maintenance equipment to ZE fuels. Thus, the General Plan 2045 would not conflict with actions under the transportation technology sector.</p> <p>Would Not Conflict. The state must continue to support low-carbon liquid fuels during this period of transition and for much harder sectors for ZEV technology such as aviation, locomotives, and marine applications. Biomethane currently displaces fossil fuels in transportation and will largely be needed for hard-to-decarbonize sectors but will likely continue to play a targeted role in some fleets while the transportation sector transitions to ZEVs. Private investment in alternative fuels will play a key role in diversifying the transportation fuel supply away from fossil fuels. EO N-79-20 calls on state agencies to support the transition of existing fuel production facilities away from fossil fuels and directs that this transition also protect and support workers, public health, safety, and the environment. In line with this direction, existing refineries could be repurposed to produce sustainable aviation fuel, renewable diesel, and hydrogen.</p> <p>While these actions and strategies apply to state and local agencies, GHG emissions generated by passenger, truck, and bus vehicular travel as a result of future development under the General Plan 2045 would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation, and mobile source emissions generated by future development under the General Plan 2045 would be reduced with implementation of the wider use of zero-carbon fuels consistent with reduction of GHG emissions under AB 1279. Additionally, the General Plan 2045 has a goal of decarbonizing the transportation sector by transitioning existing fleet vehicles and construction and maintenance equipment to ZE fuels. Thus, the General Plan 2045 would not conflict with actions in the transportation fuels sector.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Vehicles Miles Traveled Sector		
<ul style="list-style-type: none"> • Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045. • Reimagine new roadway projects that decrease VMT in a way that meets community needs and reduces the need to drive. • Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience. • Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices • Expand and complete planned networks of high-quality active transportation infrastructure. • Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations. • Streamline access to public transportation through programs such as the California Integrated Travel Project. • Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support implementation of these plans. • Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower income residents. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Managing total demand for transportation energy by reducing the miles people need to drive on a daily basis is also critical as the state aims for a sustainable transportation sector in a carbon neutral economy. VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state’s climate, air quality, and equity goals. CARB did not set regulatory limits on VMT in the 2022 Scoping Plan because the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices.</p> <p>While these actions and strategies apply to state and local agencies, SB 375 requires SCAG to direct the development of the RTP/SCS for the region. The General Plan 2045 would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern. Further, the location, design, and land use from future growth anticipated by the General Plan 2045 would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing future mixed-use, commercial, and residential developments around major transit areas. Several transit agencies provide local and regional transit service within Culver City, including Metro, Culver CityBus, Culver CityRide, Santa Monica Big Blue Bus, Los Angeles Commuter Express, and Los Angeles Metro Bus. Refer to Table 4.16-1 in Section 4.16, <i>Transportation</i>, of this Draft PEIR, for a summary of transit service in Culver City.</p> <p>The General Plan 2045 focuses on thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City’s industrial areas. By distributing growth along corridors, including in areas well served by transit, housing would be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and transit-oriented communities (TOC), the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the Inglewood Oil Field (IOF). The Mobility Element establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation which would result in more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities. The General Plan 2045 contains policies to reduce VMT such as prioritizing multimodal projects and integrated</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Clean Electricity Grid Sector	State agencies and local agencies	<p>public transportation services, providing a cohesive active travel network, providing high-quality transit services, reducing first/last mile barriers, providing secure and covered bicycle parking at key destinations, providing equitable transit access, and providing accessible pedestrian facilities. Therefore, the General Plan 2045 would not conflict with the VMT reduction standards of the RTP/SCS and the General Plan 2045 would not conflict with applicable RTP/SCS actions and strategies to reduce GHG emissions.</p>
<ul style="list-style-type: none"> • Use long-term planning processes (Integrated Energy Policy Report, IRP, CAISO Transmission Planning Process, AB 32 Climate Change Scoping Plan) to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment. • Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, statewide and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets. • Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state's decarbonization roadmap for adjustments as may be needed. • Facilitate long lead-time resource development through the IRP and the SB 100 interagency process and through technology development and demonstration funding³⁷⁶ that includes resources such as long-duration energy storage and hydrogen production. • Continue coordination between energy agencies and energy proceedings to maximize opportunities for demand response. • Continue to explore the benefits of regional markets to enhance decarbonization, reliability, and affordability. • Address resource build-out challenges, including permitting, interconnection, and transmission network upgrades. • Explore new financing mechanisms and rate designs to address affordability. • Per SB 350, double statewide energy efficiency savings in electricity and fossil gas end uses by 2030, through a combination of energy efficiency and fuel substitution actions. • Per SB 100 and SB 1020, achieve 90 percent, 95 percent, and 100 percent renewable and zero-carbon retail sales by 2035, 2040, and 2045, respectively. • Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Decarbonizing the electricity sector depends on both using energy more efficiently and replacing fossil-fueled generation with renewable and zero carbon resources, including solar, wind, energy storage, geothermal, biomass, and hydroelectric power. The RPS Program and the Cap-and-Trade Program continue to incentivize dispatch of renewables over fossil generation to serve state demand.</p> <p>SB 100 increased RPS stringency to require 60 percent renewables by 2030 and for California to provide 100 percent of its retail sales of electricity from renewable and zero-carbon resources by 2045. Furthermore, SB 1020 has added interim targets to SB 100's policy framework to require renewable and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all electricity retail sales by 2040; establish a planning goal of at least 20 GW of offshore wind by 2045; and that state agencies plan for an energy transition that avoids the need for new fossil gas capacity to meet California's long-term energy goals.</p> <p>California also continues to advance its appliance and building energy efficiency standards to reduce growth in electricity consumption and meet the SB 350 goal to double statewide energy efficiency savings in electricity and fossil gas end uses by 2030. Increased transportation and building electrification and continued policy commitment to behind-the-meter solar and storage will continue to drive growth of microgrids and other distributed energy resources (DER).</p> <p>Continued transition to renewable and zero-carbon electricity resources will enable electricity to become a zero-carbon substitute for fossil fuels. To reach the 2045 target, the state will need to quadruple its current level of wind and solar capacity. This transformation will drive investments in a large fleet of generation and storage resources but will also require significant transmission to accommodate these new capacity additions. Resources such as storage and demand-side management are essential to maintain reliability with high concentrations of renewables. Hydrogen produced from renewable resources and renewable feedstocks can serve a dual role as a low-carbon fuel for existing combustion turbines or fuel cells, and as energy storage for later use.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 would support SB 100's goals since future development facilitated by adoption of the General Plan 2045 would utilize the renewable energy provided by the regulated entity, SCE. SCE is required to generate electricity that would increase renewable energy resources to 50 percent by</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<ul style="list-style-type: none"> Target programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community owned or controlled solar or wind, battery storage, and microgrids) for communities most at need, including frontline, low-income, rural, and indigenous communities. Prioritize public investments in zero-carbon energy projects to first benefit the most overly burdened communities affected by pollution, climate impacts, and poverty. 		<p>2030. Further, Culver City is supplied with electricity by the CPA, which is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. The CPA automatically defaults to supplying 100 percent renewable energy to Culver City, although customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA and remain with SCE as their provider. As the CPA or SCE would provide electricity service to future development facilitated by the General Plan 2045 would use electricity consistent with the requirements of SB 100. In 2020, SCE provided 43 percent from renewable sources, exceeding the required target 33 percent by 2020 established under previous legislation.</p> <p>The General Plan 2045 would comply with this action/strategy as the City is located within the SCE service area and future development facilitated by the General Plan 2045 would be required to comply with CALGreen and Title 24 energy efficiency standards. Additionally, the General Plan 2045 includes a goal for fossil fuel free energy which includes giving residents and businesses affordable access to carbon free and renewable energy resources, enhancing local energy generation and storage, aligning energy conversion and enhancement projects with public open space and trails provisioning, and ensuring compliance with adopted building reach codes to mandate building electrification. As such, the General Plan 2045 would not conflict with SB 100.</p> <p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under California Code of Regulations Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. Future development facilitated by the General Plan 2045 would meet or exceed the applicable requirements of Title 24, Part 6, as well as the California Green Building Standards Code in Title 24, Part 11 as adopted and amended in the CCMC. The General Plan 2045 would further support this action and strategy by incorporating energy efficiency measures as outlined in the General Plan 2045 policies. As such, the General Plan 2045 would not conflict with SB 350.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Sustainable Manufacturing and Buildings Industry Sector		
<ul style="list-style-type: none"> • Maximize air quality benefits using the best available control technologies for stationary sources in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities. • Prioritize alternative fuel transitions first in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities. • Invest in research and development and pilot projects to identify options to reduce materials and process emissions along with energy emissions in California’s industrial manufacturing facilities, leveraging programs like the CEC’s Electric Program Investment Charge (EPIC). • Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. • Support electrification with changes to industrial rate structures. • Develop infrastructure for CCS and hydrogen production to reduce GHG emissions where cost-effective and technologically feasible non-combustion alternatives are not available. • Implement SB 905. • Establish markets for low-carbon products and recycled materials using Buy Clean California Act and other mechanisms relying on robust data • Develop a net-zero cement strategy to meet SB 596 targets for the GHG intensity of cement use in California. • Continue to leverage energy-efficiency programs, including the U.S. DOE’s ENERGY STAR program, U.S. DOE’s Superior Energy Performance program, and ISO 50001. • Evaluate and continue to offer incentives to install energy efficiency and renewable energy technologies through programs such as CPUC decisions as part of rulemaking R.19-09-009393 and the CEC’s Food Production Investment Program (FPIP) and EPIC programs. • Leverage low-carbon hydrogen programs, including the Bipartisan Infrastructure Law, for regional hydrogen hubs, hydrogen electrolysis, and hydrogen manufacturing and recycling. • Evaluate the role of hydrogen in meeting GHG emission reductions, including policy recommendations regarding the use of hydrogen in California as required by SB 1075. • Address cost barriers to promote low-carbon fuels for hard-to-electrify industrial applications. 	<p>State agencies and local agencies</p>	<p>Consistent. Fossil gas is the primary gaseous fossil fuel used to produce heat at industrial facilities, as well as in residential and commercial buildings. Gaseous fossil fuel use can be displaced by four primary alternatives: zero-carbon electricity, solar thermal heat, hydrogen, and biogas/biomethane. The 2022 Scoping Plan reduces dependence on fossil gas in the industrial and building sectors by transitioning substantial energy demand to alternative fuels. Combustion of fossil gas, other gaseous fossil fuels, and solid fossil fuels provide energy to meet three broad industry needs: electricity, steam, and process heat. Non-combustion emissions result from fugitive emissions and from the chemical transformations inherent to some manufacturing processes. About 20 percent of the GHG emissions from the industrial sector are non-combustion emissions. Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions. Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion CO₂ emissions can be captured and sequestered. This sector has a continuing demand for fossil gas due to lack of non-combustion technologically feasible or cost-effective alternatives for certain industrial sectors. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities.</p> <p>While these actions and strategies apply to state and local agencies, each future project developed under the General Plan 2045 would be required to comply with applicable USEPA, CARB and SCAQMD emissions standards, rules, and regulations regarding fossil fuel use. The General Plan 2045 would not conflict with actions in the sustainable manufacturing and buildings industry sector.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Sustainable Manufacturing and Buildings Building Sector		
<ul style="list-style-type: none"> • Prioritize California’s most vulnerable residents with the majority of funds in the new \$922 million Equitable Building Decarbonization program, created through the 2022–2023 state budget. This would include residents in frontline, low-income, disadvantaged, rural, and tribal communities. This program is dedicated to a statewide direct-install building retrofit program for low-income households to replace fossil fuel appliances with electric appliances, energy-efficient lighting, and building insulation and sealing while also coordinating reductions in gas infrastructure in specific geographic areas. • Achieve three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030. • Expand incentive programs to support the holistic retrofit of existing buildings, especially for vulnerable communities. • Ensure that incentive programs prioritize energy affordability and tenant protections, promote affordable and low-income household retrofits that improve habitability and reduce expenses, protect and empower small landlords and homeowners, address overlooked consumer groups, and pair decarbonization with other critically needed renovation efforts to ensure that buildings support human health and are climate- and weather-resistant. • End fossil gas infrastructure expansion for newly constructed buildings. • Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. • Strengthen California’s building standards to support zero-emission new construction. • Develop building performance standards for existing buildings. • Adopt a zero-emission standard for new space and water heaters sold in California beginning in 2030, as specified in the 2022 State Strategy for the State Implementation Plan. • Expand use of low-GWP refrigerants within buildings. • Support electrification with changes to utility rate structures and by promoting load management programs. • Increase funding for incentive programs and expand financing assistance programs focused on existing buildings and appliance replacements. • Expand consumer education efforts to raise awareness and stimulate the adoption of decarbonized buildings and appliances, especially in vulnerable communities. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings and will rely primarily on advancing energy efficiency while replacing gas appliances with non-combustion alternatives. This transition must include the goal of trimming back the existing gas infrastructure, so pockets of gas-fueled residential and commercial buildings do not require ongoing maintenance of the entire limb for gas delivery. Blending low-carbon fuels such as hydrogen and biomethane into the pipeline further displaces fossil gas. Pipeline safety and reliability must be evaluated to accommodate low-carbon fuels. This transition is achieved when all new buildings constructed include non-combustion appliances, and appliances in existing buildings are replaced at the end of their useful life with non-combustion alternatives.</p> <p>While these actions and strategies apply to state and local agencies, as stated above, each future project developed under the General Plan 2045 would be required to comply with applicable USEPA, CARB and SCAQMD emissions standards, rules, and regulations regarding fossil fuel use. The General Plan 2045 would not conflict with actions in the sustainable manufacturing and buildings industry sector.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<ul style="list-style-type: none"> Implement biomethane procurement targets for investor-owned utilities as specified in SB 1440 (Hueso, Chapter 739, Statutes of 2018) to reduce GHG emissions in remaining pipeline gas and reduce methane emissions from organic waste. 		
Carbon Dioxide Removal and Capture Sector		
<ul style="list-style-type: none"> Implement SB 905 Convene a multi-agency Carbon Capture and Sequestration Group comprised of federal, state, and local agencies to engage with environmental justice advocates, tribes, academics, researchers, and community representatives to identify the current status, concerns, and outstanding questions concerning CCS, and develop a process to engage with communities to understand specific concerns and consider guardrails to ensure safe and effective deployment of CCS. Iteratively update the CARB CCS Protocol with the best available science and implementation experience. Incorporate CCS into other sectors and programs beyond transportation where cost-effective and technologically feasible options are not currently available and to achieve the 85 percent reduction in anthropogenic sources below 1990 levels as called for in AB 1279. Evaluate and propose, as appropriate, financing mechanisms and incentives to address market barriers for CCS and CDR. Evaluate and propose, as appropriate, the role for CCS in cement decarbonization (SB 596) and as part of hydrogen production pathways (SB 1075). Support carbon management infrastructure projects through core CEC research, development, and demonstration (RD&D) programs. Continue to explore carbon capture applications for producing or leveraging zero-carbon power for reliability needs as part of SB 100. Consider carbon capture infrastructure when developing hydrogen roadmaps and strategy, especially for non-electrolysis hydrogen production. Evaluate and streamline permitting barriers to project implementation while protecting public health and the environment. Explore options for how local air quality benefits can be achieved when CCS is deployed. Explore opportunities for CCS and CDR developers to leverage existing infrastructure, including subsurface infrastructure. Explore permitting options to allow for scaling the number of sources at carbon sequestration hubs. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. The deployment of CDR to counterbalance hard-to-abate residual emissions is unavoidable if net zero CO2 or GHG emissions are to be achieved. Modeling shows that emissions from the AB 32 GHG Inventory sources will continue to persist even if all fossil related combustion emissions are phased out. These residual emissions must be compensated for to achieve carbon neutrality wither with CDR, which includes both sequestration in natural and working lands and mechanical approaches like direct air capture, CCS, which is carbon capture from anthropogenic point sources involves capturing carbon from a smokestack of an emitting facility, or direct air capture, which captures carbon directly from the atmosphere.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 is a policy document that guides land use development that would not conflict with measures to increase carbon dioxide removal and capture.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Short-Lived Climate Pollutants (Non-Combustion Gases) Dairy and Livestock Methane Sector		
<ul style="list-style-type: none"> • Install state of the art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to decarbonize or as a feedstock for energy. • Increase alternative manure management projects, including but not limited to conversion to “solid,” “dry,” or “scrape” manure management; installation of a compost-bedded pack barn; an increase in the time animals spend on pasture; and implementation of solid-liquid separation technology into flush manure management systems. • Implement enteric fermentation strategies that are cost-effective, scientifically proven, safe for animal and human health, and acceptable to consumers, and that do not impact animal productivity. Provide financial incentives for these strategies as needed. • Accelerate demand for dairy and livestock product substitutes such as plant-based or cell-cultured dairy and livestock products to achieve reductions in animal populations. • In consideration of pace of deployment of methane mitigation strategies and the scale of complimentary incentives, consider regulation development to ensure that the 2030 target is achieved, assuming the conditions outlined in SB 1383 are met. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Short-Lived Climate Pollutants (SLCPs) include black carbon, methane, and fluorinated gases. HFCs are the fastest growing source of GHG emissions, primarily driven by their use to replace ozone-depleting substances and an increased demand for cooling and refrigeration. Dairy and livestock are the largest sources of methane emissions followed by landfills.</p> <p>The General Plan 2045 would not conflict with SLCP dairy and livestock methane sector actions in the 2022 Scoping Plan. There are no dairy or livestock uses within the Planning Area. The General Plan 2045, as a policy document that guides future land use development, does not include future dairy or livestock uses.</p>
Short-Lived Climate Pollutants (Non-Combustion Gases) Landfill Methane Sector		
<ul style="list-style-type: none"> • Maximize existing infrastructure and expand it to reduce landfill disposal, with strategies including composting, anaerobic digestion, co-digestion at wastewater treatment plants, and other non-combustion conversion technologies. • Expand markets for products made from organic waste, including through recognition of the co-benefits of compost, biochar, and other products. • Recover edible food to combat food insecurity. • Invest in the infrastructure needed to support growth in organic recycling capacity. • Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity. • Direct biomethane captured from landfills and organic waste digesters to sectors that are hard to decarbonize. • Implement improved technologies and best management practices at composting and digestion operations. • Reduce emissions from landfills through improvements in operational practices, lower permeability covers, advanced collection systems, and technologies to utilize landfill gas. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. SB 1383 has a 75 percent organic waste disposal reduction target below the 2013 baseline by 2030. The state did not achieve the 50 percent reduction in organic waste disposal below 2014 levels by 2020. The CPUC approved a decision in February 2022 implementing the biomethane procurement program, which will require investor-owned utilities by 2025 to procure 17.6 billion cubic feet (BCF) of biomethane produced from organic wastes to support the landfill disposal reduction and SLCP target and reduce fossil gas reliance for residential and commercial customers. Organic waste will also be reduced by measures to remove edible food from the waste stream. Emissions can also be reduced by improvements in operational practices at landfills including lower permeability covers, advanced landfill gas collection systems, and increased monitoring to detect and repair leaks.</p> <p>The General Plan 2045 would not conflict with SLCP landfill methane sector actions in the 2022 Scoping Plan.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<ul style="list-style-type: none"> Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks, improve understanding of the factors that lead to better capture efficiency, and explore new technologies and practices that can reliably improve methane control at landfills. 		
Short-Lived Climate Pollutants (Non-Combustion Gases) Upstream Oil and Gas Methane Sector		
<ul style="list-style-type: none"> Mitigate emissions from leaks by regular leak detection and repair (LDAR) surveys at all facilities. Replace high emitting equipment with zero emission alternatives wherever feasible. Have CARB and CalGEM lead a Task Force to identify and address methane leaks from oil infrastructure near communities. Pursuant to SB 1137, develop leak detection and repair plans for facilities in health protection zones, implement emission detection system standards, and provide public access to emissions data. Minimize emissions from equipment that must vent fossil gas by design (e.g., fossil gas powered compressors). Install vapor collection systems on high emitting equipment. Phase out venting and routine flaring of associated gas (gas produced as a by-product during oil production). Continuous ambient monitoring at fossil gas underground storage facilities to quickly detect large methane sources. Reduce pipeline and compressor blowdown emissions. Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. California is currently on track to achieve a 41 percent reduction in methane emission from oil and gas production by 2025 relative to 2013. To meet the 2030 target, regulatory requirements to further reduce intentional venting of fossil gas from equipment are needed.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 would not conflict with SLCP upstream oil and gas methane sector actions in the 2022 Scoping Plan.</p>
Short-Lived Climate Pollutants (Non-Combustion Gases) Hydrofluorocarbons Sector		
<ul style="list-style-type: none"> Expand the use of very low- or no-GWP technologies in all HFC end-use sectors, including emerging sectors, like heat pumps for applications other than space conditioning, to maximize the benefits of building decarbonization. Convert large HFC emitters such as existing refrigeration systems to the lowest practical GWP technologies. Prioritize small-scale and independent grocers serving priority populations in addressing existing “banks” of high-GWP refrigerants. Improve recovery, reclamation, and reuse of refrigerants by limiting sales of new or virgin high-GWP refrigerants and requiring the use of reclaimed refrigerants where appropriate. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. New targeted measures are needed to reduce HFCs, primarily from high-GWP refrigerants, to meet 2045 requirements. The adoption of low-GWP refrigerants must occur in parallel with building decarbonization efforts to maximize reductions. The sales prohibitions on newly produced refrigerants set forth in SB 1206 and the national/international HFC phasedown will help in reducing HFC emissions from existing equipment by restricting the supply of and increasing the value of existing high-GWP HFCs.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 would not conflict with SLCP hydrofluorocarbons sector actions in the 2022 Scoping Plan. These regulations would be applicable to future development facilitated by the General Plan 2045 to the extent that new development would use these regulated compounds in accordance with regulations. Any such future development would be required to comply with applicable regulations from this CARB Short-Lived Climate Pollutants reduction</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<ul style="list-style-type: none"> Assist low-income and disadvantaged communities in obtaining low-GWP space conditioning units to protect vulnerable communities from heat stress and wildfire smoke. Accelerate technology transitions in California and the U.S. overall by collaborating with international partners committed to taking action on HFCs under the Kigali Amendment to the Montreal Protocol; this includes addressing barriers to adoption of very low- or no-GWP refrigerant technologies such as high upfront costs, shortage of trained technicians, and lag in updating safety standards and building codes. 		<p>strategy, with respect to adopted limits on the use of regulated compounds for refrigeration uses. Therefore, the General Plan 2045 would not conflict with this strategy.</p>
Short-Lived Climate Pollutants (Non-Combustion Gases) Anthropogenic Black Carbon Sector		
<ul style="list-style-type: none"> Reduce fuel combustion commensurate with state's climate and air quality programs, particularly from reductions in transportation emissions and agricultural equipment emissions. Invest in residential woodsmoke reduction. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. Under current strategies, anthropogenic black carbon from transportation is expected to be reduced by over 60 percent in 2030. Continued reductions in combustion emissions across all sectors from both the state's climate and air quality programs will also reduce anthropogenic black carbon emissions.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 would not conflict with SLCP anthropogenic black carbon sector actions in the 2022 Scoping Plan. As discussed above, the location, design, and land uses of future growth facilitated by the General Plan 2045 would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by locating and increasing intensities of future mixed-use, commercial, and residential developments around major transit areas, which also results in a reduction of fuel combustion.</p>
Natural and Working Lands: Strategies for all NWL		
<ul style="list-style-type: none"> Implement AB 1757 and SB 27. Implement the Climate Smart Strategy. Accelerate the pace and scale of climate smart action, consistent with the management levels identified above, as part of a collective effort between federal, state, private, nonprofit, and individual land managers. Prioritize and practice equity, including through meaningful community engagement and prioritizing implementation of nature-based solutions that benefit the communities most vulnerable to climate change. Advance multi-benefit, collaborative, landscape-level approaches that engage communities and landowners, and incorporate adaptive managements. Consult and partner with California Native American tribes to increase co-management and tribal management authority; restore, protect, and enhance natural cultural resources, traditional foods, and cultural landscapes; respect tribal sovereignty; and support tribes' 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. AB 1757 calls for the development of an ambitious range of targets for the NWL sector to be integrated into the Scoping Plan and other state policies. SB 27 directed CARB to establish CO2 removal targets for 2030 and beyond. In response to EO N-82-20 and AB 1757, the proposed target for NWL for 2045 is a -4 percent change in total carbon stock from 2014.</p> <p>While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the City. Thus, this strategy is not directly related to future development facilitated by the General Plan 2045 and the Project would not interfere, impede, or conflict with NWL strategies for all NWL actions under the 2022 Scoping Plan.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<p>implementation of tribal expertise and Traditional Ecological Knowledge and cultural easements.</p> <ul style="list-style-type: none"> • Leverage existing innovative financial and market mechanisms, and explore new ones, between the public, private, and philanthropic sectors to secure funding of climate smart land management. • In partnership with communities, tribes, and the private sector, expand and develop new infrastructure for manufacturing and processing of climate smart agricultural and biomass products. • Leverage and support technical assistance providers: such as the UC Cooperative Extension and California’s 98 Resource Conservation Districts, that have track records of providing technical assistance to local landowners and implementing agriculture, forestry, natural resource management, and restoration projects across the state. • Establish and expand mechanisms that ensure NWL are protected from land conversion and parcelization (e.g., conservation easements or Williamson Act), in line with the strategies outlined in CNRA’s Pathways to 30x30 California. Pair land conservation projects with management plans that increase carbon sequestration, where feasible. • Increase opportunities for private and philanthropic investments in nature-based climate solutions, utilizing existing voluntary and compliance carbon markets, existing state and local programs, and the California Carbon Sequestration and Climate Resiliency Project Registry established pursuant to SB 27. • Expand monitoring and tracking of management actions and outcomes consistent with the tracking and monitoring recommendations of the Climate Smart Strategy 		
Natural and Working Lands: Forest Shrublands and Chaparral		
<ul style="list-style-type: none"> • Accelerate the pace and scale of climate smart forest management to at least 2.3 million acres annually by 2025, in line with the climate smart management strategies identified in this Scoping Plan, the NWL Climate Smart Strategy, and the Wildfire and Forest Resilience Action Plan. • Establish and expand mechanisms that ensure forests, shrublands, and grasslands are protected from land conversion and that support ongoing, rather than one-time, management actions. • In collaboration with state and local agencies, accelerate the deployment of long-term carbon storage from waste woody biomass residues resulting from climate smart management, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums. • Expand infrastructure to facilitate processing of biomass resulting from climate smart management. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. California is covered by 27 percent forests and 31 percent shrublands and chaparral. Climate smart management can help make forests more resilient to climate change and less prone to catastrophic wildfire. Climate-smart management in shrublands and chaparral face can provide protection for threatened communities and natural resources.</p> <p>While these actions and strategies apply to state and local agencies, there are some natural and working forest shrublands and chaparral lands within portions of the IOF and Kenneth Hahn State Recreational Area within the City limits and Sphere of Influence (SOI) (refer to Section 4.3, Biological Resources, for discussions of the vegetation communities within portions of the IOF and Kenneth Hahn State Recreational Area). The City is focused on the protection and enhancement of the biological resources within the City’s portion of the IOF as part of ongoing maintenance and use, with a long-term vision for decommissioning and a change in use. In October 2021, the City adopted an Oil Termination Ordinance (Zoning code amendment P2021-0036-ZCA) intended to implement an amortization program that would terminate and</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<ul style="list-style-type: none"> Expand permit streamlining in collaboration with state and local agencies to accelerate implementation of climate smart forest management while protecting natural resources. 		<p>phase out nonconforming oil and gas activities within the City's portion of the IOF. The adopted Oil Termination Ordinance included a requirement for the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. The General Plan 2045 also includes Goal C-2, Biological Resources, and specifically Policy C.2-6, which requires standards and guidelines to protect plant and wildlife species from new development, including in the IOF, Kenneth Hahn State Recreational Area and other open space areas. Thus, the Project would not interfere, impede, or conflict with strategies on any NWL where forests, shrublands, and chaparral occur under the 2022 Scoping Plan.</p>
Natural and Working Lands: Grasslands		
<ul style="list-style-type: none"> Establish and expand mechanisms that ensure grasslands are protected from land conversion/parcelization and that support ongoing, rather than one-time, management actions that improve carbon sequestration. Deploy grassland management strategies, like prescribed grazing, compost application, and other regenerative practices, to support soil carbon sequestration, biodiversity, and other ecological improvements. Increase adoption of compost production on farms and application of compost in appropriate grassland settings for improved vegetation and carbon storage, and to deliver waste diversion goals through nature-based solutions. 	State agencies and local agencies	<p>Would Not Conflict. California is covered by 9 percent grasslands. The protection of grasslands provides an opportunity to reduce sprawl and complement VMT reduction strategies. Climate smart strategies can increase grassland resilience to climate change by improving species diversity and maintaining or increasing soil carbon stocks.</p> <p>While these actions and strategies apply to state and local agencies, there are some natural and working grasslands within portions of the IOF and Kenneth Hahn State Recreational Area within the City limits and SOI (refer to Section 4.3, Biological Resources, for discussions of the vegetation communities within portions of the IOF and Kenneth Hahn State Recreational Area). The City is focused on the protection and enhancement of the biological resources within the City's portion of the IOF as part of ongoing maintenance and use, with a long-term vision for decommissioning and a change in use. The City has adopted an Oil Termination Ordinance (Zoning code amendment P2021-0036-ZCA) intended to implement an amortization program that would terminate and phase out nonconforming oil and gas activities within the City's portion of the IOF and includes a requirement for the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. The General Plan 2045 also includes Goal C-2, Biological Resources, and specifically Policy C.2-6, which requires standards and guidelines to protect plant and wildlife species from new development, including in the IOF, Kenneth Hahn State Recreational Area, and other open space areas. Thus, the Project would not interfere, impede, or conflict with strategies on any NWL where grasslands occur under the 2022 Scoping Plan.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Natural and Working Lands: Croplands		
<ul style="list-style-type: none"> Accelerate the pace and scale of healthy soils practices to 80,000 acres annually by 2025, conserve at least 8,000 acres of annual crops annually, and increase organic agriculture to 20 percent of all cultivated acres by 2045. Utilize the recommendations included in CDFA's Farmer and Rancher-Led Climate Change Solutions report to accelerate deployment of healthy soils practices, organic farming, and climate smart agriculture practices. Establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture. Support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems, such as implementing the California Department of Pesticide Regulation's (DPR's) Sustainable Pest Management Work Group recommendations. Conduct research on the intersection of pesticides, soil health, GHGs, and pest resiliency via a multi-agency effort with DPR, CDFA, and CARB. Conduct outreach and education to develop and facilitate the increased adoption of safer, more sustainable pest management practices and tools; reduce the use of harmful pesticides; promote healthy soils; improve water and air quality; and reduce public health impacts. In collaboration with state and local agencies, accelerate the deployment of alternatives to agricultural burning that increase long-term carbon storage from waste agricultural biomass, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums. Work across state agencies to reduce regulatory and permitting barriers around some healthy soils practices (e.g., composting), where appropriate. Utilize innovative agriculture energy use and carbon monitoring and planning tools to reduce on-farm GHG emissions from energy and fertilizer application or to increase carbon storage, as well as to promote on-farm energy production opportunities. 	<p>State agencies and local agencies</p>	<p>Would Not Conflict. California is covered by 9 percent croplands. In addition to food, croplands provide considerable carbon storage in the soil and, in perennial croplands, in aboveground biomass. Climate smart practices can maintain or increase the climate resilience of cropland productivity through improved soil conditions and increased pollinator habitat.</p> <p>While these actions and strategies apply to state and local agencies, there are no croplands in the City. Thus, this strategy is not directly related to future development facilitated by the Project; the Project would not interfere, impede, or conflict with strategies on any NWL where croplands occur under the 2022 Scoping Plan.</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Natural and Working Lands: Wetlands		
<ul style="list-style-type: none"> Restore 60,000 acres of Delta wetlands annually by 2045 to reduce methane emissions from wetlands and reverse the resulting subsidence. Identify and prioritize wetland restoration efforts around climate vulnerable communities. Leverage other funding and institutions to support wetland restoration projects, including land trusts, local funding, federal funding, and private and philanthropic funding to support wetlands restoration projects. Work across state agencies to reduce regulatory and permitting barriers around wetland restoration projects, where appropriate. 	State agencies and local agencies	<p>Would Not Conflict. California is covered by 2 percent wetlands. Wetlands are hotspots for diversity, contain considerable carbon in the soil, are critical to the states' water supply, and protect upland areas from flooding due to sea level rise and storms. Climate smart strategies to restore and protect wetlands can reduce emissions while simultaneously improving the climate resilience of surrounding areas and improving the water quality and yield for the state.</p> <p>While these actions and strategies apply to state and local agencies, there are no wetlands in the City. Thus, this strategy is not directly related to future development facilitated by the General Plan 2045 and the Project would not interfere, impede, or conflict with strategies on any NWL where wetlands occur under the 2022 Scoping Plan.</p>
Natural and Working Lands: Developed Lands		
<ul style="list-style-type: none"> Increase urban forestry investment annually by 200 percent, relative to business as usual. Increase public awareness of urban forest benefits and, where appropriate, prioritizing irrigation of trees over lawns. Provide technical assistance and resources to disadvantaged communities to implement community urban greening projects to provide equitable access to the benefits of urban greening projects. Work with state and local agencies to expand technical assistance for and enforcement of the defensible space requirements of PRC 4291 to reduce wildfire risk to homes and structures. 	State agencies and local agencies	<p>Would Not Conflict. California is covered by 6 percent developed lands. Developed lands include urban, suburban, and rural areas, as well as transportation and supporting infrastructure. The vegetation within cities and communities are all part of developed lands. This vegetation provides numerous benefits to surrounding areas, including carbon storage, air and water filtration, reduced urban heat island effect, and access to nature. Climate smart strategies to protect and expand the urban forests, landscaping, green spaces, parks, and associated vegetation can increase their climate resilience and the benefits Californians derive from them. Urban forests have a significant potential to sequester carbon.</p> <p>While these actions and strategies apply to state and local agencies, there are some natural and working developed lands within portions of the IOF and Kenneth Hahn State Recreational Area within the City limits and SOI, as well as various parks (refer to Section 4.3, Biological Resources, for discussions of the vegetation communities within portions of the IOF and Kenneth Hahn State Recreational Area). The City is focused on the protection and enhancement of the biological resources within the City's portion of the IOF as part of ongoing maintenance and use, with a long-term vision for decommissioning and a change in use. The City has adopted an Oil Termination Ordinance (Zoning code amendment P2021-0036-ZCA) intended to implement an amortization program that would terminate and phase out nonconforming oil and gas activities within the City's portion of the IOF and includes a requirement for the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. The General Plan 2045 also includes Goal C-2, Biological Resources, and specifically Policy C.2-3, which requires management of vegetation at parks and open spaces in Culver City to support biodiversity by reducing pesticide use and reducing use of non-native species, and Policy C.2-6, which requires standards and guidelines to protect plant and wildlife species from new development,</p>

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Natural and Working Lands: Vegetated Lands		
<ul style="list-style-type: none"> Establish and expand mechanisms that ensure sparsely vegetated lands are protected from land conversion, prioritizing those areas most vulnerable to climate change and loss. 	State agencies and local agencies	<p>including in the IOF, Kenneth Hahn State Recreational Area, and other open space areas. Thus, the Project would not interfere, impede, or conflict with strategies on any NWL where developed lands occur under the 2022 Scoping Plan.</p> <p>Would Not Conflict. California is covered by 10 percent sparsely vegetated lands. Vegetated lands include deserts, beaches, dunes, bare rock, and areas covered in ice and snow. Vegetated lands provide limited carbon storage, but nonetheless, are important for open space, unique habitats, and recreational opportunities.</p> <p>While these actions and strategies apply to state and local agencies, the General Plan 2045 includes numerous goals and policies regarding protection and expansion of vegetated lands as appropriate (refer to Section 4.3, Biological Resources, for relevant goals and policies). Thus, the Project would not interfere, impede, or conflict with strategies on any NWL where vegetated lands occur under the 2022 Scoping Plan.</p>
SOURCE: ESA 2024.		

2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The purpose of the 2020–2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG’s Program EIR for the 2020–2045 RTP/SCS, certified on May 7, 2020, states that “[e]ach [metropolitan planning organization] is required to prepare an SCS as part of their RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375”.¹¹⁷ The 2020–2045 RTP/SCS seeks improved mobility and accessibility, which is defined as “the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices”.¹¹⁸ According to the 2020–2045 RTP/SCS, “[g]rowth within TPAs supports Connect SoCal’s strategies for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation”.¹¹⁹

In order to assess the General Plan 2045’s potential to conflict with the 2020–2045 RTP/SCS, this section analyzes the General Plan 2045’s consistency with the strategies and policies set forth in the 2020–2045 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable City and regional land use plans and regulations, such as SCAG’s 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The General Plan 2045 would not conflict with the 2020–2045 RTP/SCS goals as detailed in **Table 4.7-9, Consistency with Applicable 2020–2045 SCAG RTP/SCS Actions and Strategies.**

As presented in the table, the Project would not conflict with and would support the applicable goals and benefits of the 2020–2045 RTP/SCS to reduce GHG. Accordingly, the General Plan 2045 would encourage development in a manner that would not conflict with the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements. As discussed in Section 4.16, Transportation, future development under the General Plan 2045 would result in significant and unavoidable transportation VMT impacts. Efforts to reduce VMT may include TDM strategies and the implementation of capital improvement projects that improve mobility and accessibility for active transportation and transit users. Nonetheless, while the Project would result in significant and unavoidable transportation VMT impacts, it is a separate impact determination and substantial evidence discussed above demonstrates the Project would not conflict with the 2020–2045 RTP/SCS for the purposes of GHG emissions.

¹¹⁷ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

¹¹⁸ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

¹¹⁹ Southern California Association of Governments, 2020a. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Connect SoCal, October.

**TABLE 4.7-9
CONSISTENCY WITH APPLICABLE 2020–2045 SCAG RTP/SCS ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	Local Jurisdictions, SCAG	<p>No Conflict. The General Plan 2045 would not conflict with this action and strategy. The location, design, and land uses of future development facilitated by the General Plan 2045 would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing future mixed-use, and residential density and locating mixed-use, commercial, and residential developments around major transit areas. Several transit agencies provide local and regional transit service within Culver City, including Metro, Culver CityBus, Culver CityRide, Santa Monica Big Blue Bus, Los Angeles Commuter Express, and Los Angeles Metro Bus. Refer to Table 4.16-1 in Section 4.16, <i>Transportation</i>, of this Draft PEIR, for a summary of transit service in Culver City.</p> <p>The proposed General Plan 2045 focuses on thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City’s industrial areas. By distributing growth along corridors, including in areas well served by transit, housing would be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and transit-oriented communities (TOC), the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the IOF. The Mobility Element establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation which would result in more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities. Therefore, the General Plan 2045 would not conflict with the VMT reduction strategies of the RTP/SCS and the General Plan 2045 would not conflict with applicable RTP/SCS actions and strategies to reduce GHG emissions.</p>
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	Local Jurisdictions, SCAG	<p>No Conflict. The General Plan 2045 would not conflict with this action and strategy. The General Plan 2045 seeks to intensify and mix land uses on key segments of the commercial corridors and allow for new residential and mixed-use development within the City’s industrial areas. The City is primarily built out and future development would constitute infill and would likely consist of redevelopment of properties. The General Plan 2045 would distribute growth along corridors, including in areas well served by transit, thereby incrementally adding housing in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. In addition to infill and TOCs, the land use plan for the City promotes the retention and expansion of creative economy businesses and other emerging technologies in these industrial mixed-use areas and mixed-use corridors; supports the needs of</p>

Actions and Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
		<p>neighborhood-serving retail by encouraging commercial and experiential opportunities, particularly in the Downtown area; and advances strategies that ensure a safe and effective phase out of the Inglewood Oil Field (IOF). The Mobility Element establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation which will result in more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities. Therefore, the General Plan 2045 would prioritize infill and redevelopment of underutilized parcels to accommodate growth and based on the proposed land use map and goals and policies in the Mobility Element, amenities and connectivity would be increased.</p>
<p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)</p>	Local Jurisdictions, SCAG	<p>No Conflict. The General Plan 2045 would not conflict with this action and strategy. As discussed above, the location, design, and land uses of future development facilitated by the General Plan 2045 would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by distributing growth along corridors, including in areas well served by transit. In addition, the General Plan 2045 contains policies to reduce VMT such as prioritizing multimodal projects and integrated public transportation services, providing a cohesive active travel network, providing high-quality transit services, reducing first/last mile barriers, providing secure and covered bicycle parking at key destinations, providing equitable transit access, and providing accessible pedestrian facilities. See Section 4.16, Transportation, of this Draft PEIR for further discussion.</p>
<p>Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space</p>	Local Jurisdictions, SCAG	<p>No Conflict. The General Plan 2045 would not conflict with this action and strategy and would support these actions through the implementation of General Plan 2045 strategies for electric vehicle-ready and electric vehicle-capable infrastructure and parking spaces. The General Plan 2045 targets growth in major transit areas and higher densities, especially in mixed-use designations, would increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities. Proposed Improvements to the bicycle, pedestrian, and road networks identified in the proposed Mobility Element would make it easier for residents to travel throughout the community.</p> <p>The policies recommended in the Mobility Element supports transportation of people and goods by various means, including automobile, transit, bicycle, pedestrian, and other emerging mode choices. Components of the network are designed, implemented, and operated according to functions aligning with the travel markets they are intended to serve, as well as the access needs of the surrounding communities along corridors. In addition to prioritizing traffic calming and other active transportation-focused projects at key intersections, the Mobility Element pedestrian network recommends improved connections to schools and increases opportunities for crossing Ballona Creek. The Mobility Element prioritizes Class II and Class IV facilities along major thoroughfares which would connect to Class II and Class III bikeways. The emerging mobility network in the Mobility Element includes dozens of mobility hubs located near corridors with supportive bicycle and pedestrian infrastructure, such as Ballona Creek, designated Transit Priority Corridors that support high-frequency transit service, and major activity centers such as schools, parks, commercial areas, and major employment centers.</p>

Actions and Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation	Local Jurisdictions, SCAG	No Conflict. The General Plan 2045 would not conflict with this action and strategy. The operation of future development facilitated by the General Plan 2045 would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. Future development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	Local Jurisdictions, SCAG	No Conflict. The General Plan 2045 would not conflict with this action and strategy. The operation of future development facilitated by the General Plan 2045 would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. Future development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops.
Identify ways to improve access to public park space	Local Jurisdictions	No Conflict. The General Plan 2045 would not conflict with this action and strategy. The General Plan 2045 would improve connectivity and land use compatibility within and between existing neighborhoods, thereby providing more linkages within the City and the region. The General Plan 2045 would provide for higher densities, especially in mixed-use and residential designations, and increased capacity for residential and mixed-use development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities. Identified improvements to the bicycle, pedestrian, and road networks would make it easier for residents to travel throughout the community.
Transportation Demand Management (TDM) Strategic Plan provide an objectives-driven, performance-based process to identify and promote TDM strategies and programs across the region. SCAG will pursue implementation of these strategies in coordination with regional and local partners.	Local Jurisdictions	No Conflict. The General Plan 2045 would not conflict with this action and strategy and would include goals and policies that support TDM strategies, such as General Plan 2045 policies in the Mobility Element (refer to Section 4.16, <i>Transportation</i> , of this Draft PEIR, for a list of the proposed policies).

SOURCE: ESA, 2024.

Culver City's Green Building Program

As discussed in Chapter 2, *Project Description*, of the Draft PEIR, the General Plan 2045 includes a Greenhouse Gas Reduction Element, which includes goals and policies that address sustainability including greenhouse gas emissions, landfill disposal, water efficiency, and transportation. Future development projects under the General Plan 2045 would be required to comply with the goals and policies in the Greenhouse Gas Reduction Element and with the Culver City Green Building Program and ordinances and would achieve improved building energy efficiency, energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging spaces, as well as bicycle spaces would be required as per 2022 CALGreen Code Requirements. Therefore, the Project would not result in future development projects that would conflict with Culver City's Green Building Program.

GHG Reduction Plans, Policies and Regulations

In summary, based on the analysis above, the General Plan 2045, which would guide City development through 2045, would not conflict with plans, policies and regulations for reducing GHG emissions and this impact would be less than significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable GHG emissions control strategies and regulations as discussed above. Since the Zoning Code Update would be consistent with the General Plan 2045, development that would occur under the Zoning Code Update would not conflict with applicable plans, policies and regulations for reducing GHG emissions and this impact would be less than significant.

Applicable Proposed General Plan Goals and Policies

See goals and policies provided under Threshold GHG-1.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

4.7.5 Cumulative Impacts Analysis

Analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions and additionally, climate change impacts related to GHG emissions do not necessarily occur in the same area as a project is located. The emission of GHGs by a single development project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHGs from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences

of climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change.

The state has mandated a GHG emissions target of reducing statewide emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050 even while statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB has established and is implementing regulations to reduce statewide GHG emissions. Currently, there are no adopted CARB, SCAQMD, or City significance thresholds or specific numeric reduction targets applicable to the Project, and no approved policy or guidance to assist in determining significance at the cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3),¹²⁰ the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: 2022 Scoping Plan, SCAG's 2020–2045 RTP/SCS, and Energy Action Plan. Discretionary projects in other jurisdictions in California would also be required to evaluate project-level and cumulative impacts for GHG emissions, as applicable. Given that the Project would not conflict with applicable GHG reduction plans, policies, and regulations, emissions associated with future development that could occur under the proposed General Plan 2045 would be less than significant on a cumulative basis.

¹²⁰ As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a proposed project's incremental contribution to a cumulative impact can be found not cumulatively considerable if a proposed project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of a project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."

4.8 Hazards and Hazardous Materials

4.8.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on hazards and hazardous materials from implementation of the Project, including potential impacts related to routine use, transportation, or disposal of hazardous materials; accident or upset conditions involving the release of hazardous materials; emitting hazardous emissions or handling hazardous materials near schools; hazardous materials sites; impairing or interfering with emergency response plans; and wildland fire hazards. The section provides context regarding the Planning Area's existing hazardous materials sites and emergency response process, as well as relevant federal, State, and local regulations and programs.

Additional analyses regarding hazards and health risk related to emissions of toxic air contaminants (TACs) are addressed in Section 4.2, *Air Quality*. Other geotechnical-related safety hazards, such as earthquakes, are addressed in Section 4.6, *Geology and Soils*. Flooding and inundation hazards, including those related to erosion and mudflow, are addressed in Section 4.9, *Hydrology and Water Quality*. Transportation-related safety hazards are addressed in Section 4.16, *Transportation*. Lastly, potential hazards to humans and structures from natural or human induced wildland fires are addressed in Section 4.19, *Wildfire*.

4.8.2 Environmental Setting

Hazardous Materials and Hazardous Waste

Materials and waste may be considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). Definitions of terms used in the characterization of baseline conditions, regulatory framework, and impact analysis for hazards and hazardous materials are provided below.

- **Hazardous Material:** The term “hazardous material” can have varying definitions depending on the regulatory programs. For the purposes of this Draft PEIR, the term refers to both hazardous materials and hazardous wastes. The California Health and Safety Code (HSC) Section 25501(p) defines hazardous material as any material that because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.
- **Hazardous Waste:** A “hazardous waste” is a waste that because of its quantity, concentration, or physical, chemical, or infectious characteristic, causes or significantly contributes to an increase in mortality or illness or poses substantial or potential threats to public health or the environment (42 U.S.C. 6903[5]). Hazardous wastes are further defined under the Resource Conservation and Recovery Act (RCRA) as substances exhibiting the

characteristics of ignitability, reactivity, corrosivity, or toxicity. Chemical-specific concentrations used to define whether a material is a hazardous, designated, or nonhazardous waste include Total Threshold Limit Concentrations (TTLCs), Soluble Threshold Limit Concentrations (STLCs), and Toxic Characteristic Leaching Procedure (TCLPs), listed in California Code of Regulations (CCR) CCR Title 22, Chapter 11, Article 3, Section 66261, and used as waste acceptance criteria for landfills. Waste materials with chemical concentrations above TTLCs, STLCs, and TCLPs must be sent to Class I disposal facilities, may be sent to Class II disposal facilities depending on the waste material, and may not be sent to Class III disposal facilities.

- **Screening Levels for Hazardous Materials in Soil, Soil Gas, or Groundwater:** The United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) and San Francisco Bay Area Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) are guidelines used to evaluate the potential risk associated with chemicals found in soil or groundwater where a release of hazardous materials has occurred. Although developed and maintained by the San Francisco Bay Area RWQCB, ESLs are used by regulatory agencies throughout the state.¹ Screening levels have been established for both residential and commercial/industrial land uses, and for construction workers. Residential screening levels are the most restrictive; soil with chemical concentrations below these levels generally would not require remediation and would be suitable for unrestricted uses if disposed of offsite. Commercial/industrial screening levels are generally less restrictive than residential screening levels because they are based on potential worker exposure to hazardous materials in the soil (and these are generally less than residential exposures). Screening levels for construction workers are also less restrictive than for commercial/industrial workers because construction workers are only exposed to the chemical of concern during the duration of construction, while industrial workers are assumed to be exposed over a working lifetime. Chemical concentrations below these screening levels generally would not require remediation and would be suitable for unrestricted uses. In addition, there are other more specific but similar screening levels used more narrowly focused human health or ecological risk assessment considerations.

Regulation of hazardous wastes is undertaken on the federal, State, and local levels. The USEPA and the California Department of Toxics Substances Control (DTSC) have developed and continue to update lists of hazardous wastes subject to regulation. The South Coast Air Quality Management District (SCAQMD), in coordination with the California Air Resources Board (CARB), is responsible for developing and implementing rules and regulations regarding air toxins on a local level. SCAQMD establishes permitting requirements, inspects emissions sources, and enforces measures through educational programs and/or fines.

Potential Receptors/Exposure

The sensitivity of potential receptors in the areas of known or potentially hazardous materials contamination is dependent on several factors. The primary factor is an individual's potential pathway for exposure. Exposure pathways include external exposure, inhalation, and ingestion of tainted air, water, or food. The magnitude, frequency, and duration of human exposure can

¹ The San Francisco Bay Area RWQCB develops ESLs for the use of all California RWQCBs.

cause a variety of health effects ranging from short term acute symptoms to long term chronic effects. Potential health effects from exposure can be evaluated in a health risk assessment. The principle elements of exposure assessments typically include:

- Evaluation of the fate and transport processes for hazardous materials at a given site;
- Identification of potential exposure pathways;
- Identification of potential exposure scenarios;
- Calculation of representative chemical concentrations; and
- Estimation of potential chemical update.

Hazardous Building Materials

Many buildings and structures can be of an age where the potential exists for the presence of hazardous building materials. Older buildings can contain building materials that consist of hazardous components such as lead-based paint (LBP), asbestos, mercury, and polychlorinated biphenyls (PCBs). When these buildings or structures are demolished for renovation or new development, these hazardous building materials can become exposed.

Before the USEPA ban in 1978, LBP was commonly used on interior and exterior surfaces of buildings. Old peeling paint has been found to contaminate near-surface soil, and exposure to residual lead has resulted in illness in children.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction before such uses were banned by the USEPA in the 1970s. Asbestos can lead to lung disease by inhaling its tiny fibers.

Spent fluorescent light tubes commonly contain mercury vapors. In February 2004, regulations took effect in California classified all fluorescent lamps and tubes as a hazardous waste. When these lamps or tubes are broken, mercury is released to the environment. Mercury can be absorbed through the lungs into the bloodstream and can be washed by rainwater into waterways.

PCBs are organic oils that were formerly used primarily as insulators in many types of electrical equipment, including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid to late 1970's, USEPA banned PCB use in most new equipment and began a program to phase out certain existing PCB containing equipment. Fluorescent lighting ballasts manufactured after January 1, 1978, do not have PCBs and are required to have a label clearly stating that PCBs are not present in the unit.

Hazardous Materials Storage and Transportation

Releases, leaks, or disposal of chemical compounds, such as petroleum hydrocarbons, on or below the ground surface, can lead to contamination of underlying soil and groundwater and into the bay. Disturbance of a previously contaminated area through grading or excavation operations could expose the public to health hazards from physical contact with contaminated

materials or hazardous vapors. Improper handling or storage of contaminated soil and groundwater can further expose the public to these hazards, or potentially spread contamination through surface water runoff or airborne dust. In addition, contaminated groundwater can spread down gradient, potentially contaminating subsurface areas of surrounding properties.

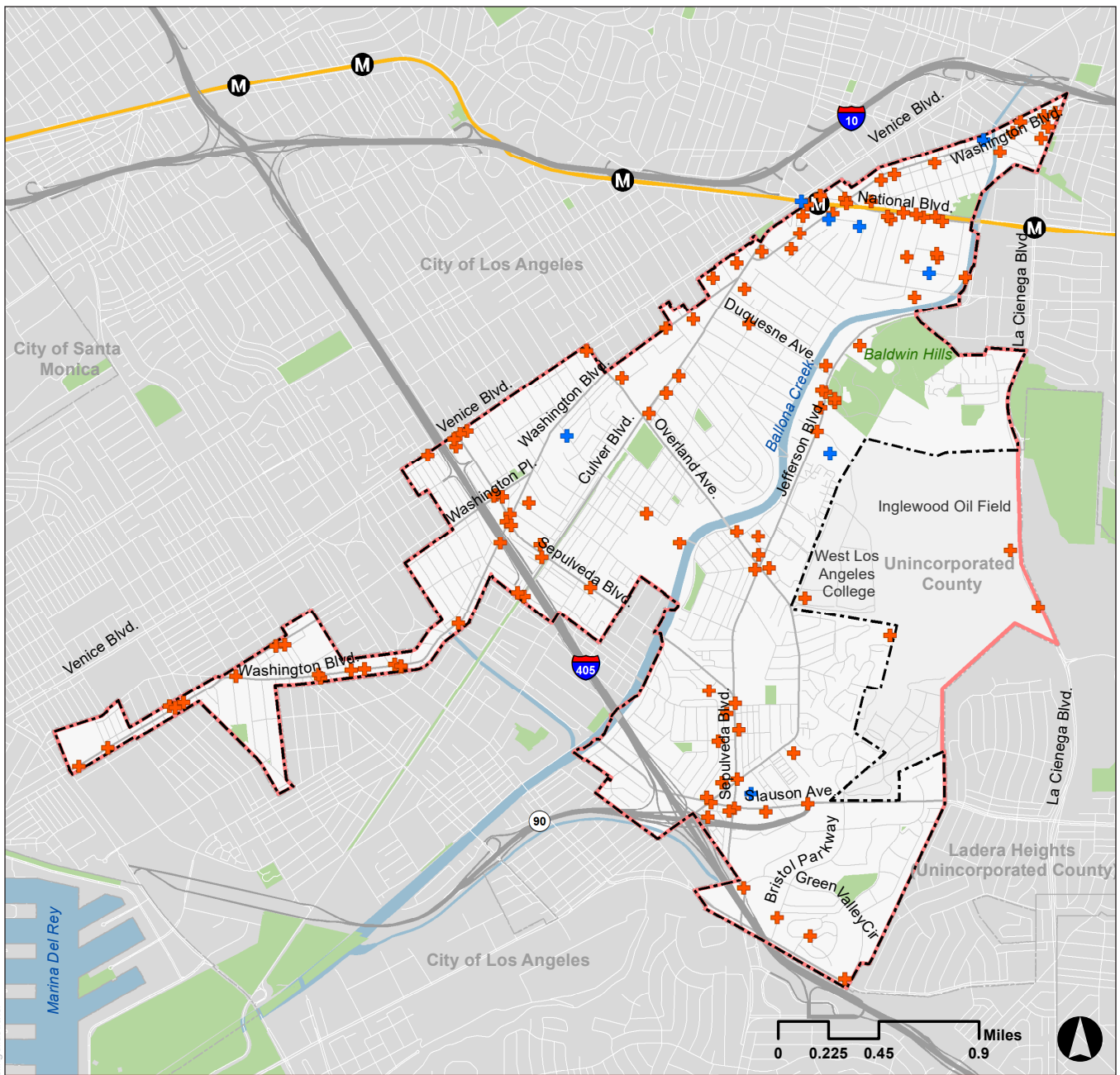
Areas where historical or ongoing activities have resulted in the known or suspected release of hazardous materials to soil and groundwater, and where current investigation and clean-up activities are located, are monitored by DTSC or the State Water Resources Control Board (SWRCB). According to DTSC's Envirostor database, there are eight sites listed in the Planning Area of which two are active cleanup sites, three are certified and require no further action, two are inactive, and one has been referred to another agency.² The Geotracker database maintained by the SWRCB, identified a total of 114 sites for the Planning Area.³ However, 97 of those listings have been closed and require no further action, three are inactive, and two are eligible for closure. The remaining 12 sites are actively being remediated, assessed, or in a verification monitoring program (see **Figure 4.8-1, Hazard Sites within the Planning Area**).

Various hazardous materials are commonly transported, stored, used, and disposed of in activities such as construction, industry (both light and heavy), dry cleaning, film processing, landscaping, automotive maintenance and repair, and common residential/commercial maintenance activities. The use, transport, storage, and disposal of hazardous materials is regulated by USEPA, California EPA (Cal/EPA) including the six boards, departments, and offices: Air Resources Board, Department of Pesticide Regulation, DTSC, Office of Environmental Health Hazard Assessment (OEHHA), and SWRCB. Also, the Department of Public Health Center for Environmental Health and other local regulatory agencies closely monitor businesses and industry in the control of hazardous materials. In addition, businesses that handle more than a certain amount of hazardous materials are required to report their inventories to the California Environmental Reporting System (CERS).

Hazardous materials require special methods of disposal, storage, and treatment, and any unintentional release of hazardous materials requires an immediate response to protect human health and safety, and the environment. Improper disposal can harm the environment, nearby people and workers exposed to the waste, and people who work in the waste management industry. Transportation of hazardous materials by truck and rail is regulated by the United States Department of Transportation (USDOT). USDOT regulations establish criteria for safe handling procedures. Federal safety standards are included in the California Administrative Code. In addition, the California Health Services Department regulates the haulers of hazardous waste.

² California Department of Toxics Substances Control, 2023. EnviroStor Online Database. <https://www.envirostor.dtsc.ca.gov/public/>. Accessed May 2023.

³ State Water Resources Control Board, 2023. GeoTracker Online Database. <https://geotracker.waterboards.ca.gov/>. Accessed May 2023.



- City Limits
- Sphere of Influence
- M Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- + EnviroStor Site (DTSC)
- + Geotracker (SWRCB)



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; DTSC, 2023; SWRCB, 2023

Culver City General Plan 2045

Figure 4.8-1
Hazard Sites within the Planning Area



Inglewood Oil Field

The Inglewood Oil Field (IOF), which is one of the largest urban oil fields in the nation and has been in continuous operation since 1924, is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The IOF is approximately 1,000 acres in size with roughly 78 acres located in the city. The first oil-producing well was drilled in the IOF in 1924, and by 1925 over 50,000 barrels of oil were produced per day.⁴ By the early 2000s, as many as 368 million barrels of oil and 269 billion cubic feet of natural gas (mostly methane) were being produced. Over IOF's history, 1,600 wells have been drilled within the historical boundaries of the IOF.⁵ As of 2022, the IOF has more than 400 active producing wells, producing an average of 4,700 barrels of oil and 2.6 million cubic feet of natural gas gross daily.⁶ Numerous laws have been enacted to regulate hazardous materials and waste, including regulations specific to the oil and gas industry. California has the most stringent regulations and oversight of oil and gas operations in the country, with the primary oversight agency being California Geologic Energy Management Division (CalGEM). The Culver City Fire Department (CCFD) can respond to hazardous materials emergencies at the IOF at the First Responder Operations (FRO) level and has prompt access to specialized hazardous materials resources via the California Master Mutual Aid plan.

Following a series of accidental gas release and odor events in late 2005 and early 2006, community, County, and City interest in the IOF activities peaked. Subsequently, the County initiated a process to regulate oil and gas production activities within the unincorporated County portion of the IOF. In 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (BHCS), which established the oil and gas regulations for operation of the majority area of the IOF, within the unincorporated County just easterly of and adjacent to Culver City. The BHCS includes requirements for monitoring and managing potential concerns related to the release of hazardous materials.

Independent of the County's BHCS regulatory program, in 2017, Culver City Council initiated preparation of an amortization⁷ study to evaluate and financially and factually support ending oil and gas extraction activities within the Culver City portion of the IOF. As a result of the information learned through the completed amortization study, in concert with other community safety considerations, in October 2021, the City Council adopted an Oil Termination Ordinance to implement an amortization program that would terminate and phase out what

⁴ Culver City, 2017. Inglewood Oil Field Specific Plan Project Draft Environmental Impact Report. <https://www.culvercity.org/files/assets/public/documents/city-manager/inglewood-oil-field/environmental-review-process/toc091117.pdf>. Accessed April 2023.

⁵ Sentinel Peak Resources California, LLC, 2017. History of Inglewood Oil Field. <https://inglewoodoilfield.com/history-future/history-inglewood-oilfield/>. Accessed May 2023.

⁶ Sentinel Peak Resources California, LLC, 2022. The Inglewood Oil Field: 2022 Annual Newsletter and Community Announcement. <https://inglewoodoilfield.com/wp-content/uploads/2022/09/2022-IOF-Annual-Newsletter.pdf>. Accessed May 2023.

⁷ Amortization is a common accounting concept that refers to how a capital account is allocated over time. Loans are often amortized by regularly paying principal and interest over a fixed term. Investments in capital assets are amortized for accounting and tax purposes by allocating the capital investment to specific periods over the life of the asset.

are now nonconforming oil and gas activities within the Culver City portion of the IOF by November 24, 2026.

From 2013-2019, there have been two reportable releases of hazardous materials from the IOF within city boundaries, neither of which reached Ballona Creek. In 2013, an inter-facility pipeline leaked seven barrels of produced water⁸ that drained onto the street and then into the storm drain near Blackwelder Street (near the intersection of La Cienega Boulevard and Fairfax Avenue). In April 2019, there was an oil-water leak along Leash Lane near the Bone Yard dog park. The leak traveled along the curb and gutter to a storm drain inlet, was redirected from the storm drain, and the flow traveled toward, but was fully contained just short of, the intersection at Jefferson Boulevard and Duquesne Avenue.

Schools

Some populations, such as children, are more susceptible to health effects of hazardous materials than the general population. Hazardous materials used near schools and day care centers must consider potential health effects to these populations, often referred to as “sensitive receptors.” Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors.

To protect sensitive receptors, Section 17210 et seq. of the State Education Code, Sections 21151.2 and 21151.4, and 21151.8 of the Public Resources Code (PRC) require that prospective school sites be reviewed to determine that such sites are not a current or former hazardous waste disposal site, a hazardous substance release site, or the site of hazardous substance pipelines. These laws also require consultation with local hazardous materials agencies and air quality districts to ensure that sites within one-quarter mile of a school that handle or emit hazardous substances would not potentially endanger future students or workers at the prospective school site.

Pursuant to the State Education Code, all school districts receiving State funds are required to prepare a Phase I Environmental Site Assessment (ESA) on prospective school sites. The Phase I ESA details the historical uses of the property and indicates any potential for contamination. DTSC must review this assessment and make one of the following findings: (1) that no further action is required; or (2) that concerns about contamination exist and the district must conduct a Preliminary Endangerment Assessment (PEA). The PEA process entails site sampling and the development of a detailed risk assessment of any contaminants present on the proposed school property.

⁸ Produced water is water trapped underground that surfaces during oil and gas exploration and production. It may include any chemicals added during the oil and gas drilling, production, and treatment processes.

The following schools are located within city limits:

- El Marino Elementary School – 1450 Port Road
- El Rincon Elementary School – 11177 Overland Avenue
- Farragut Elementary School – 10820 Farragut Drive
- La Ballona Elementary School – 10915 Washington Boulevard
- Linwood E. Howe Elementary School – 4100 Irving Place
- Culver City Middle School – 4601 Elenda Street
- Culver City High School – 4401 Elenda Street

Emergency Response

Emergency response plans include elements to maintain continuity of government during an emergency, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, State, and local level for all types of disasters, including human-made and natural. It is the government's responsibility to undertake an ongoing comprehensive approach to emergency management in order to avoid or minimize the effects of hazardous events. Local governments have the primary responsibility for preparedness and response activities. The Los Angeles County Office of Emergency Management (County OEM) maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. The County OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in Los Angeles County. The Planning Area is located within Areas A and H, Los Angeles County, Region 1, Southern Administrative Region of the State Office of Emergency Services.⁹ City staff have been designated to coordinate all State Emergency Management System (SEMS) functions. During the response phase, the Fire Station Number 1's Emergency Operations Center (EOC) serves as the coordination and communication point, and the access to the Los Angeles County Operational Area.

Evacuation of the Planning Area, if necessary because of an emergency, would be conducted by the City's Public Works Department, Los Angeles County Sherriff's Department (LACSD), and Los Angeles County Fire Department (LACFD) in accordance with the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Pursuant to regulatory requirements, the MJHMP is being updated concurrently with the General Plan 2045. In the event that an emergency occurs, evacuation routes have been identified that lead to gateway exit points located at the City boundary. The designated evacuation routes throughout the city are depicted in **Figure 4.8-2, Primary Evacuation Routes**. Additional evacuation routes include those streets that lead to evacuation centers within the City. Three evacuation reception centers have been identified in the City's Disaster Preparedness Guide, including the Culver City Senior Center, Veterans Memorial Building and Culver City Teen Center. Through coordination with the City's Public

⁹ Emergency Network Los Angeles, 2023. Disaster Management Areas, Cities, and Unincorporated Areas. <https://enla.org/map/>. Accessed May 2023.

Works Department, LACSD, and LACFD, three representative emergency scenarios have been identified which would require an evacuation of populations within select evacuation zones within the City. Three emergency scenarios studied in an Evacuation Study include a potential wildfire hazard scenario, a dam inundation scenario, and a flood inundation scenario.¹⁰

Interstates 10 and 405, Venice Boulevard, Lincoln Boulevard, Jefferson Boulevard, and Sepulveda Boulevard all serve as potential evacuation routes, along with other roadways as needed. Information about emergency evacuation routes is shown in the maps contained in the MJHMP. These maps identify areas and communities with only one access route, particularly in residential areas, and distances to destinations for three evacuation scenarios.

Wildland Fire Hazards

Wildfires often occur in forests or other wildlands with ample vegetation. In areas where structures and other human development meet or intermingle with wildlands or vegetative fuels (referred to as the wildland-urban interface [WUI]), wildfires can cause significant property damage and pose extreme threats to public health and safety. Wildland fires have historically occurred in the surrounding Los Angeles County region but have not affected the city, including the 2019 Getty Fire in Los Angeles, 2003 Padua Fire in Los Angeles County, and the 1993 Topanga Fire in Malibu.

Fire Hazard Severity Areas in Los Angeles County are designated by the California Department of Forestry and Fire Prevention (CAL FIRE), LACFD and the Culver City Fire Department (CCFD) within the Planning Area. Fire hazard severity zones (FHSZs) range from Moderate to Very High. There are three types of FHSZs based on who is financially responsible for preventing and suppressing wildfires.

- **Federal Responsibility Areas (FRAs):** The federal government is financially responsible for wildfire suppression.
- **State Responsibility Areas (SRAs):** The State is financially responsible for wildfire suppression.
- **Local Responsibility Areas (LRAs):** Cities or the County are financially responsible for wildfire suppression. The Planning Area falls under the LRA.

The Planning Area falls under the LRA, with the eastern portion mapped as being within a Very High FHSZ (VHFHSZ).¹¹ Refer to Section 4.19, *Wildfire*, for a detailed discussion pertaining to the potential impacts of the Project related to wildfire and fire hazards.

¹⁰ Culver City and Culver City Unified School District, 2023. Evacuation Route Capacity and Viability Study.

¹¹ California Department of Forestry and Fire Protection, 2011. Very High Fire Hazard Severity Zones in Local Responsibility Areas (Culver City). September 2011.



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SOURCE: City of Culver City and Culver City Unified School District, 2023

Culver City General Plan 2045

Figure 4.8-2
Primary Evacuation Routes



4.8.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

Resource Conservation and Recovery Act

The federal RCRA (42 United States Code [U.S.C.] secs. 6901–6992k), which amended and revised the Solid Waste Disposal Act, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own programs for the regulation of hazardous waste as long as they are at least as stringent as RCRA's.

Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for UST installations installed after December 22, 1988, as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies.¹² It also requires industry to report on the storage, use, and releases of hazardous substances to federal, State, and local governments. EPCRA requires State and local governments, and Indian tribes to use this information to prepare for and protect their communities from potential risks.

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. OSHA was created to assure safe and healthy working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. The United States Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in CCR, Title 8, or 8 CCR generally and in the Labor Code secs. 6300–6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness

¹² United States Environmental Protection Agency, 2023. Emergency Planning and Community Right-to-Know Act (EPCRA). <https://www.epa.gov/epcra/what-epcra>. Accessed April 2023.

Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

Toxic Substances Control Act

In 1976, the federal Toxic Substances Control Act (15 U.S. Code (U.S.C.) Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose hazards. The Toxic Substances Control Act is enforced by USEPA through inspections of places in which asbestos-containing materials (ACM) are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators. The Toxic Substances Control Act establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use and disposal restrictions or labeling of products. PCBs are hazardous materials regulated by USEPA under the Toxic Substances Control Act (TSCA). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. PCBs were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, and electrical transformers, among others. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the Hazardous Waste Control Law (HWCL), which lists PCBs as hazardous waste.

Under the TSCA, USEPA has enacted strict requirements on the use, handling, and disposal of ACM. These regulations include the phasing out of friable asbestos and ACM in new construction materials began in 1979. In 1989, USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. TSCA also establishes USEPA’s Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

Hazardous Materials Transportation Act

USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S.C. Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of the HMTA. The Pipeline and Hazardous Materials Safety Administration (PHMSA),¹³ formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100–180.¹⁴ Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the

¹³ United States Department of Transportation, 2021. Federal Hazmat Law, September 2021.

¹⁴ CFR, Title 49, Parts 100–180, Transportation, revised as of October 1, 2010.

transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce."

Research and Special Programs Administration

Research and Special Programs Administration (RSPA) regulations cover definition and classification of hazardous materials, communication of hazards to workers and the public, packaging and labeling requirements, operational rules for shippers, and training. They apply to interstate, intrastate, and foreign commerce by air, rail, ships, and motor vehicles, and also cover hazardous waste shipments. RSPA's Federal Highway Administration (FHWA) is responsible for highway routing of hazardous materials and highway safety permits. The United States Coast Guard regulates bulk transport by vessel. The hazardous material regulations include emergency response provisions, including incident reporting requirements. Reports of major incidents go to the National Response Center, which in turn is linked with CHEMTREC, a service of the chemical manufacturing industry that provides details on most chemicals shipped in the United States.

Federal Emergency Management Act

The Federal Emergency Management Act (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the United States Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident.¹⁵ FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the United States Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 U.S.C. Section 5121) provides the legal basis for FEMA mitigation planning requirements for State, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Section 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for State, Tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the

¹⁵ Federal Emergency Management Act, 2023. History of FEMA. <https://www.fema.gov/about/history>. Accessed April 2023.

administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

Other Hazardous Materials Regulations

In addition to USDOT regulations for the safe transportation of hazardous materials, other applicable federal laws that also address hazardous materials. These include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

State

State Policies and Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management are DTSC and the Los Angeles Regional Water Quality Control Board (LARWQCB). Other State agencies involved in hazardous materials management include Cal/OSHA and the State Office of Emergency Services (Cal OES).

Authority for the statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management

by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in USTs is regulated by SWRCB, which delegates authority to the RWQCB on the regional level, and typically to the local fire department on the local level.

The Cal/OSHA program is administered and enforced by DOSH. Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written IIPP. An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Cal OES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide State and local emergency managers with emergency coordination and technical assistance.

California Hazardous Materials Release Response Plans and Inventory Law of 1985

The California Hazardous Materials Release Response Plans and Inventory Law of 1985, also referred to as the Business Plan Act, requires preparation of Hazardous Materials Business Plans (HMBPs) and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California HSC, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several State agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including Cal/EPA and the California Emergency Management Agency. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

Hazardous Waste and Substances Sites

Government Code Section 65962.5, amended in 1992, requires the Cal/EPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese) List, which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document

used by the State, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from DTSC's EnviroStor database (HSC Sections 25220, 25242, 25356, and 116395);
2. List of open and active leaking underground storage tank (LUST) Sites by County and Fiscal Year from SWRCB's GeoTracker database (HSC 25295);
3. List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051);
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from SWRCB (Water Code Sections 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the HSC, identified by DTSC.

Hazardous Waste Control Law

The HWCL empowers DTSC to administer the State's hazardous waste program and implement the federal program in California. CCR Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

Caltrans regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are CHP and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

Underground Storage Tanks Program

The State regulates USTs through a program pursuant to HSC, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/ or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to SWRCB, which has delegated authority to RWQCBs and typically on the local level, to fire departments. The Culver City Fire Department (CCFD) and the LACFD administer and enforce federal and State laws and local ordinances for USTs within the Planning Area. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by fire department inspectors. If a release affecting groundwater is documented, the project file is transferred to the appropriate RWQCB for oversight.

Aboveground Petroleum Storage Act

In 1989, California established the Aboveground Petroleum Storage Act instituting a regulatory program covering aboveground storage tanks (ASTs) containing specified petroleum products (HSC Sections 25270–25270.13). The Aboveground Petroleum Storage Act applies to facilities with storage capacities of 10,000 gallons or more or are subject to oil pollution prevention and response requirements under 40 CFR Part 112. Under the Aboveground Petroleum Storage Act, each owner or operator of a regulated AST facility must file a storage statement biennially with SWRCB disclosing the name and address of the AST facility; the contact person for the facility; and the location, size, age, and contents of each AST that exceeds 10,000 gallons in capacity and that holds materials that are at least five percent petroleum. In addition, each owner or operator of a regulated AST must prepare a Spill Prevention Control and Countermeasure Plan in accordance with federal and State requirements (40 CFR Part 112 and HSC Section 25270.5[c]). The responsibility for inspecting ASTs and ensuring that Spill Prevention Control and Countermeasure Plans have been prepared lies with RWQCBs.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with the USEPA and OSHA, regulate removal, abatement, and transport procedures for ACMs. ACM is regulated under State regulations in CCR, Title 8, Division 1, Chapter 4, Article 4, Sections 1529 and 5208; SCAQMD has local regulations, as discussed further below. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. In addition, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, State, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Lead Based Paint Regulations

LBP is defined as any paint, varnish, stain, or other applied coating that has a one milligram per square centimeter (mg/cm^2) (5,000 microgram per gram ($\mu\text{g}/\text{g}$) or 0.5 percent by weight) or more of lead. The United States Consumer Product Safety Commission (16 CFR 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978 are much more likely to have LBP.

The demolition of buildings containing LBPs is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the HSC.

PCB Regulations

USEPA prohibited the use of PCBs in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act, 15 U.S.C. Section 2601 et seq. (TSCA) and CCR, Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.24. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The State of California likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed of accordingly. At lower concentrations for non-liquids, RWQCBs may exercise discretion over the classification of such wastes.

California Division of Occupational Safety and Health

Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials (8 CCR, Section 1529). Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead.

The Safe Drinking Water and Toxic Enforcement Act

The Safe Drinking Water and Toxic Enforcement Act (HSC, Section 25249.5, et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans. It also restricts the discharges of listed chemicals into known drinking water sources above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

California Water Code

The California Water Code (CWC) authorizes SWRCB to implement provisions of the Clean Water Act (CWA), including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. With regard to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the underground parking structure and building foundations. Under the CWC, discharge of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited unless conducted in compliance with a Waste Discharge Requirement (WDR) permit. In addition to the CWC, these permits implement and are in compliance with the federal CWA's National Pollutant Discharge Elimination System (NPDES) program. The dewatering program is implemented on the regional scale by the various RWQCBs, as discussed further below.

Government Code Section 3229, Division

In compliance with Section 3229, Division 3 of the PRC, before commencing any work to abandon any oil or natural gas well, the owner or operator shall request approval from the

CalGEM, formerly the Division of Oil, Gas, and Geothermal Resources, via a written notice of intention to abandon the well.

California Fire Code

The 2019 California Fire Code (CFC), written by the California Building Standards Commission, is based on the 2018 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The CFC, Chapter 9 of Title 24 of the CCR, was created by the California Building Standards Commission based on the IFC and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

Uniform Fire Code

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill.

California Governor’s Office of Emergency Services (Cal OES)

In 2009, the State passed legislation creating Cal OES and authorized it to prepare a SEMS program (Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local governments request assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the State’s preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead State agency for emergency management in the State. It also serves as the lead agency for mobilizing the State’s resources and obtaining federal resources. Cal OES

coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with the local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

Government Code Sections 65302.15 and 65302(g)(5)

In 2019 and 2020, California enacted two pieces of legislation regarding evacuation and require that cities update their Safety Elements, Emergency Operations Plan, or MJHMP, to identify and evaluate evacuation routes. California Government Code Section 65302.15, adopted through Assembly Bill (AB) 747, includes the requirement to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. In addition, California Government Code Section 65302(g)(5), adopted through Senate Bill (SB) 99, requires identification of residential developments in hazard areas that do not have at least two emergency evacuation routes. These evacuation routes are included in the five-year update to the City's MJHMP. Findings from this evacuation planning analysis and process may be found as Appendix C in the City's MJHMP.

Emergency Managed Mutual Aid System

Cal OES developed the Emergency Managed Mutual Aid (EMMA) System in response to the 1994 Northridge Earthquake. The EMMA System coordinates emergency response and recovery efforts along the coastal, inland, and southern regions of California. The purpose of EMMA is to provide emergency management personnel and technical specialists to afflicted jurisdictions in support of disaster operations during emergency events. Objectives of the EMMA Plan is to provide a system to coordinate and mobilize assigned personnel, formal requests, assignment, training, and demobilization of assigned personnel; establish structure to maintain the EMMA Plan and its procedures; provide the coordination of training for EMMA resources, including SEMS training, coursework, exercises, and disaster response procedures; and to promote professionalism in emergency management and response. The EMMA Plan was updated in November 2012 and supersedes the 1997 EMMA Plan and November 2001 EMMA Guidance.

Regional

South Coast Air Quality Management District Rule 1403

SCAQMD Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean up procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with ACM, asbestos storage facilities, and waste disposal sites.

Los Angeles County Operational Area Emergency Response Plan

The County of Los Angeles developed the Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the ERP is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a SEMS, mutual aid, and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

Los Angeles County All-Hazards Mitigation Plan

Los Angeles County's All-Hazards Mitigation Plan was adopted in May 2020.¹⁶ The plan includes risk assessments and hazard mitigation strategies for a variety of hazards including wildfire. It describes the fireproof coating of and provision of auxiliary power for critical assets; Los Angeles County's brush program, vegetation management program, and education and awareness programs to mitigate wildfire hazard risks; the Wildland Urban-Interface Ordinance as a codification of development standards to guide development in WUI areas; and various community wildfire protection plans to identify strategic sites and methods for fuel reduction projects across the landscape.

Local

Culver City Fire Code

At the local level, CCFD monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the HSC are required to file an Accidental Risk Prevention Program with the CCFD.¹⁷ This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. CCFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC sec. 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used

¹⁶ Los Angeles County Chief Executive Office, 2020. 2020 County of Los Angeles All-Hazards Mitigation Plan. <https://ceo.lacounty.gov/wp-content/uploads/2022/04/County-of-Los-Angeles-All-Hazards-Mitigation-Plan-APPROVED-05-2020.pdf>. Accessed May 2023.

¹⁷ The California Accidental Release Prevention program encompasses both the federal "Risk Management Program," established in the CFR, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the CCR, Division 2, Chapter 4.5.

and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds (i.e., a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are liquids, 500 pounds for solids, or 200 cubic feet for compressed gas) must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency.¹⁸

CCFD also administers, enforces, and inspects applicable standards of the Fire Code, Title 19, Uniform Building Code, Culver City, and national codes concerning new construction and remodeling. As part of inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review. Businesses that handle any single hazardous material at any one time in any amount greater than or equal to 55 gallons for a liquid, 500 pounds for a solid, or 200 cubic feet for a gas, have a reportable quantity and must report the inventory to CCFD.

CCFD provides emergency services within Culver City, including for fire, emergency medical, technical rescue (vehicle accident response, natural disaster response, swift water rescue, confined space rescue, low and high angle rope rescue, and structural collapse rescue), and hazardous materials incidents. CCFD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters, and significant events.

Culver City Hazardous Waste Management Plan

As stated in Chapter 9.03.300 of the City's Municipal Code, pursuant to State requirements, the City, in its efforts to assist in the proper management of hazardous waste and to provide adequate protections for its citizens, adopted the Culver City Hazardous Waste Management Plan (CCHWMP) for the management of hazardous waste, including the siting of hazardous waste storage, transfer and/or disposal facilities, which is consistent with the provisions of the Los Angeles County Hazardous Waste Management Plan (LA CoHWMP). The CCHWMP includes the following elements:

- An analysis of the hazardous waste stream generated in Los Angeles County, including an accounting of the volumes of hazardous waste produced in the county by type of waste, and estimates of the expected rates of hazardous waste production until 1994, by type of waste.
- A description of the existing hazardous waste facilities which treat, handle, recycle, and dispose of the hazardous waste produced in the county, including a determination of the existing capacity of each facility.
- An analysis of the potential in the county for recycling hazardous waste and for reducing the volume and hazard of hazardous waste at the source of generation.

¹⁸ California Health and Safety Code, Division 20, Chapter 6.95, Article 1; CCR, Title 19, Sections 2620–2732; CCR, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.

- A consideration of the need to manage the small volumes of hazardous waste produced by businesses and households.
- A determination of the need for additional hazardous waste facilities to properly manage the volumes of hazardous waste currently produced or that are expected to be produced during the planning period.
- Siting criteria to be utilized in selecting sites for new hazardous waste facilities.
- A statement of goals, objectives, and policies for the siting of hazardous waste facilities and the general management of hazardous wastes through the year 2000, as well as a statement of the goals of the City.
- A schedule which describes County and City actions necessary to implement the LA CoHWMP and CCHWMP through the year 2000, including the assigning of dates for carrying out the actions.

Culver City Hazardous Materials Disclosure Reporting Program

Senate Bill (SB) 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) which requires the administrative consolidation of six hazardous materials and waste programs under one agency, a Certified Unified Program Agency (CUPA). Culver City is a member of the Los Angeles County CUPA, which requires that every business that handles more than 55 gallons, 5 pounds, or 200 cubic feet or more of a hazardous material (as defined by HSC) at any one time report their inventories of hazardous materials to LACFD and CCFD. This requirement is also applicable to quantities as low as one pound of materials classified as “extremely hazardous” (as defined by HSC). Per the City’s CUPA/Hazardous Materials Disclosure Reporting Program, business that meet the above hazardous materials thresholds must submit Reporting Forms manifesting the hazardous materials used, and an Emergency Plan for responding to any potential spills of these materials, to LACFD and CCFD to be kept on file by these departments.¹⁹

Culver City and Culver City Unified School District (CCUSD) Multi-Jurisdictional Hazard Mitigation Plan

Culver City and CCUSD received a grant to prepare a MJHMP. The MJHMP presents a strategy for reducing the City's and CCUSD’s vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan assesses the community’s risks and vulnerabilities to natural hazard events such as earthquakes, flooding, and wildfire. The MJHMP includes a set of goals related to the overall goal of hazard mitigation planning and mitigation measures that will serve to advance the plan goals. The MJHMP was approved by Cal OES and FEMA on June 1, 2017. The MJHMP process has allowed the City to review and expand upon the policies contained in the General Plan’s Safety Element. The City views the General Plan and the MJHMP as complementary planning documents that work together to achieve the ultimate goal of the reduction of risk exposure to residents within

¹⁹ Culver City Fire Department, 2005. Hazardous Materials Disclosure Program, Business Reporting Forms and Emergency Plan Packet, July 2005.

the Planning Area. Many of the ongoing recommendations identified in the MJHMP’s mitigation strategy further the goals and policies of the General Plan and other adopted plans.²⁰ Pursuant to regulatory requirements, the MJHMP is being updated concurrently with the General Plan 2045.

4.8.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if the project would:

- Threshold HAZ-1:** Create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials.
- Threshold HAZ-2:** Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Threshold HAZ-3:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Threshold HAZ-4:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment.
- Threshold HAZ-5:** Impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan.
- Threshold HAZ-6:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.
- Threshold HAZ-7:** For a project located within an airport land use plan or, where such 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 in or working in the project area.

The Initial Study (Appendix A) found no potentially significant impacts related to airport land use plans (Threshold HAZ-7); therefore, this issue is not evaluated in this section. Please see Appendix A for further discussion.

²⁰ Culver City and Culver City Unified School District, 2017. Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/files/assets/public/documents/planning-and-development/multijurisdictionalhazardm.pdf>. Accessed July 2023.

Methodology

Impacts related to hazards and hazardous materials resulting from implementation of the Project (collectively, the General Plan 2045 and Zoning Code Update) are discussed below. The following impact analysis is based on an assessment of baseline conditions for the Planning Area, including locations of hazardous materials use and storage through a review of various databases identifying existing contaminated sites and City emergency response and evacuation plan requirements. This analysis identifies potential impacts based on the interaction between the affected environment and construction, operation, and maintenance activities related to future development allowed under the Project.

Development and activities occurring under the General Plan and Zoning Code Update would be regulated by the various laws, regulations, and policies summarized in the Regulatory Framework above. Compliance by the Project with applicable federal, State, and local laws and regulations is assumed in this analysis, and local and state agencies would be expected to continue to enforce applicable requirements.

Project Impacts Analysis

Routine Use, Transportation, and Disposal of Hazardous Materials

Threshold HAZ-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials.

Impact Statement HAZ-1: The Project would be required to comply with requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. Therefore, the Project would result in a less than significant impact related to the routine use, transport, or disposal of hazardous materials.

General Plan 2045

Future development allowed under the proposed General Plan would result in additional residential and nonresidential development, as well as other private and public improvements throughout the Planning Area, which could result in an increase in the routine transportation, use, and disposal of hazardous materials. **Figure 2-6, Draft General Plan Land Use Map**, in Chapter 2, *Project Description*, of this Draft PEIR, identifies several land use designations in which uses within these areas have the potential to generate hazardous materials, including Mixed Use Corridor 2, Mixed Use Medium, Mixed Use High, and Mixed Use Industrial.

Construction

During construction activities, commercially available hazardous materials, including fuels, solvents, and paints, would be used resulting in the generation of hazardous waste. However, construction activities would be temporary, and the use of the materials would be required to comply with applicable laws and regulations governing the use and storage of hazardous materials.

Grading and excavation in infill areas may expose construction workers and the public to known or potentially unknown hazardous materials in the soil or groundwater. As discussed in Section 4.8.2, *Environmental Setting*, above, there are a number of sites throughout the Planning Area that contain hazardous materials and have the potential to pose health hazards. However, future development on contaminated sites would be required to be remediated prior to construction activities. In addition, any unknown contamination discovered during excavation would require halting of all construction activities and remediation. Remediation would be required to occur to the satisfaction of the appropriate responsible agency, DTSC, RWQCB, LACFD, or CCFD.

Future development allowed under the General Plan 2045 could involve demolition of older buildings that contain ACMs or LBP, resulting in potential exposure of these hazardous materials to workers or persons living in the area. There are various regulations pertaining to exposure, abatement, and protection from exposure to ACM and LBP. Future development requiring demolition would be required to comply with the California HSC, OSHA, and SCAQMD Rule 1403 related to removal of ACM and LBP. Compliance would require the preparation of LBP and ACM surveys for any building demolitions and appropriate remediation measures for removal of LBP and ACM during demolition activities. Asbestos and lead abatement are required to be performed and monitored by certified contractors. In addition, OSHA regulations require proper labeling, safety training, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation.

The use, transport, and disposal of construction-related hazardous materials would be required to comply with mandatory regulations for hazardous materials adopted by USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD as described above in Section 4.8.3, *Regulatory Framework*. Compliance with applicable laws and regulations governing the use, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable regulations. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. In addition, CCFD, and Culver City Building and Safety Division coordinate review of building permits to ensure hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses and proper hazardous materials storage facilities. Therefore, potential construction impacts would be less than significant.

Operation

Future development allowed under the General Plan 2045 would increase the number of residents and businesses within the city, mainly within activity centers and along commercial corridors, resulting in an increase in the amount of hazardous materials being transported, used, and stored, and the potential number of people being exposed to these materials. The transport of hazardous materials along Interstate 405, Interstate 10, State Route 90, and the City's local roadways creates potential risks for spills or leaks from nonstationary sources. In addition,

seismic activity, flooding, and fires could result in hazardous materials being released onto land or into the air and water, contaminating the environment and endangering public safety.

The use, storage, transport, and disposal of hazardous materials by residents and commercial and industrial businesses of development under the Project would be required to comply with mandatory regulations for hazardous materials adopted by USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD as described above in Section 4.8.3, *Regulatory Framework*, during operation. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

In addition, CCFD conduct inspections for fire safety and hazardous materials management of businesses and residential dwellings. Businesses handling or storing hazardous materials over threshold quantities are required to submit an HMBP to the Los Angeles County CUPA. These HMBPs must include measures for safe storage, use, and handling of hazardous materials, along with an emergency plan that describes the facility's response procedures in the event of a hazardous materials release. Should an accident occur during transport of hazardous materials, CCFD would respond. In addition, CHP conducts regular inspections of licensed transporters to ensure regulatory compliance and responds to hazardous materials emergencies on roadways.

The General Plan 2045 contains policies that would further minimize risk to the public or environment resulting from the transportation of hazardous materials and waste such as identifying and establishing specific travel routes to transport hazardous materials and wastes (Policy S-8.5); coordinating with CCFD and Los Angeles County's CleanLA to prepare for and respond to hazardous materials incidents (Policy S-8.1); requiring businesses that transport, use, and/or store hazardous materials to adopt measures that protect public health and safety (Policy S-8.2); maintaining the City's website and other outlets with information on how to safely handle household chemicals (Policy S-8.3); and revising, updating, and maintaining standards to dispose of hazardous waste and construction materials properly and effectively (Policy S-8.4). Therefore, potential operation impacts would be less than significant.

The Project identifies future land uses but does not describe specific development projects that would be undertaken during the planning horizon, and thus, estimating project-specific impacts would involve unreasonable speculation. In reviewing individual project applications and plans, the City would determine which General Plan 2045 policies and actions and Zoning Ordinance chapters apply, depending on the specific characteristics of the project type and/or project site during the development review process.

While future development allowed under the General Plan 2045 could result in an increase in the transportation, use, and disposal of hazardous materials in the Planning Area, future projects would be required to comply with requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. Therefore, impacts related to the transportation, use, and disposal of hazardous materials would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that will occur throughout the City over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials.

Furthermore, the City would review development applications for subsequent development under the Project for compliance with the applicable regulations, policies of the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-8: Hazardous materials. Local code enforcement actions are strengthened to minimize threats to public and health and safety from hazardous materials. For example, the risk of multiple releases caused by earthquakes, industrial uses, and activities within the IOF will be minimal.

S-8.1: Hazardous materials coordination. Coordinate with the Culver City Fire Department and Los Angeles County's CleanLA to prepare for and respond to hazardous materials incidents.

S-8.2: Hazardous materials use, storage, and transport. Require businesses that use, store, or transport hazardous materials to adopt measures that protect public health and safety.

S-8.3: City website updates. Maintain the City's website and other outlets with information on how to safely handle and dispose of household chemicals.

S-8.4: Disposal of hazardous waste and construction materials. Revise, update, and maintain standards to dispose of hazardous waste and construction materials properly and effectively.

S-8.5: Travel routes for hazardous material transport. Identify and establish specific travel routes to transport hazardous materials and waste. Consider capacity to safely accommodate additional truck traffic, avoiding residential areas, and using interstate or State divided highways as preferred routes.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to the routine use, transportation, or disposal of hazardous materials.

Accident and Upset Conditions

Threshold HAZ-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Statement HAZ-2: The Project would be required to comply with State law and implement federal, State, and local General Plan 2045 policies during construction activities, which would ensure that future development allowed under the General Plan 2045 would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. Therefore, the Project would result in a less than significant impact related to accident and upset conditions.

General Plan 2045

Construction

The General Plan 2045 would result in additional residential and nonresidential development throughout the city, which has the potential to result in upset or accident conditions. As Culver City is mostly “built out,” or developed, new development would primarily occur on parcels that are already developed. The majority of the future growth would occur within activity centers and along commercial corridors. In addition, the Project may result in other private and public improvements, such as road widenings and connections to existing utilities, throughout the city with the potential to result in upset or accident conditions. Construction activities have the potential to release potentially hazardous soil- and groundwater-based materials into the environment during site grading and excavation operations. Likewise, demolition of existing structures could potentially result in the release of hazardous building materials, such as asbestos and lead paint. To prevent and minimize upset or accident hazardous conditions to below a level of significance, existing local, State, and federal laws, including those listed above in Section 4.8.3, *Regulatory Framework*, would be enforced at all construction sites.

Future development (including redevelopment of existing developed sites) allowed under the General Plan 2045 must comply with Title 8 of the CCR, which establishes Cal/OSHA requirements related to public and worker protection. Topics addressed include materials exposure limits, equipment requirements, protective clothing, hazardous materials, and accident prevention. Construction safety and exposure standards for lead and asbestos are set forth in Title 8. Title 17 of the CCR establishes regulations relating to the use and disturbance of materials containing naturally occurring asbestos. Soil excavated during construction is regulated under Title 22 of the CCR. Los Angeles County CUPA, the local CUPA, is responsible for ensuring that the CCR and all other programs related to hazardous materials are implemented during construction activities.

As stated in Section 4.9, *Hydrology and Water Quality*, future development that disturbs one acre or more of soil, or that is part of a common plan of development that disturbs one acre or more of soil, must obtain permit coverage under the Construction General Permit by developing

and implementing a Storm Water Pollution Prevention Plan (SWPPP) with RWQCB prior to commencement of construction. The SWPPP must describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion, maintenance responsibilities, and non-stormwater management controls. The best management practices in the SWPPP include measures to prevent spills and require on-site materials for cleanup.

As discussed in Impact HAZ-1, compliance with mandatory regulations would reduce all potential construction-related impacts to a less than significant level, and proposed General Plan policies would further reduce potential impacts to ensure they remain less than significant.

Operation

Future development resulting from implementation of the General Plan 2045 would comply with Cal/OSHA regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility.

As noted in Impact HAZ-1, in reviewing individual project applications and plans, the City would determine which General Plan 2045 policies apply depending on the specific characteristics of the project type and/or project site during the development review process.

In addition, all new development would be required to comply with applicable regulations for hazardous materials adopted by USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD, as described above in Section 4.8.3, *Regulatory Framework*, during operation, which would ensure that all operational impacts would be less than significant.

The General Plan 2045 contains policies that would minimize risk to the public or environment resulting from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment such as eliminating and safely removing all infrastructure that is vulnerable to failure and poses a threat to public safety, health, welfare, and the environment from within the Culver City portion of the IOF and continuing to work with the County of Los Angeles to address and eliminate safety concerns for oil and gas operations continuing within the County portion of the IOF (Goal S-9 and Policy S-9.1); evaluating the potential for methane or hydrogen sulfide gas releases due to active or abandoned oil facilities or natural conditions; prioritizing the public health, safety, and welfare of the community and developing a strategy for end-of-life considerations for the IOF (Policy S-9.2); and ensuring development is consistent with federal, State, and local safety guidelines, standards, and requirements related to soil gas releases (Policy S-8.6).

Compliance with State law and implementation of federal, State, and local General Plan 2045 policies and actions during construction and operational activities would ensure that future development allowed under the General Plan 2045 would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving

release of hazardous materials into the environment. Therefore, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. Furthermore, the City would review development applications for subsequent development under the Project for compliance with the applicable regulations, as well as the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-8: Hazardous materials. Local code enforcement actions are strengthened to minimize threats to public and health and safety from hazardous materials. For example, the risk of multiple releases caused by earthquakes, industrial uses, and activities within the IOF will be minimal.

S-8.6: Gas releases. Evaluate the potential for methane or hydrogen sulfide gas releases due to active or abandoned oil facilities or natural conditions. Ensure development is consistent with federal, State, and local safety guidelines, standards, and requirements related to soil gas releases.

Goal S-9: Inglewood Oil Field. Oil production uses are phased out or replaced with land uses that the City determines to be more compatible with the adjacent communities and their character.

S-9.1: IOF safety. Eliminate and safely remove all infrastructure that is vulnerable to failure and poses a threat to public safety, health, welfare, and the environment from within the Culver City portion of the IOF and continue to work with the County of Los Angeles to address and eliminate safety concerns for oil and gas operations continuing within the County portion of the IOF that is just easterly but adjacent to Culver City.

S-9.2: IOF strategy. Prioritize the public health, safety, and welfare of the community and develop a strategy for end of operations for the IOF.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to accident and upset conditions.

Emit Hazardous Materials Within One-Quarter Mile of a School

Threshold HAZ-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Statement HAZ-3: The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one-quarter mile of a school.

General Plan 2045

As discussed in Section 4.14, *Public Services*, the city is served by CCUSD, which is comprised of five elementary schools, one middle school, one high school, one independent learning academy, and one adult education school. In addition, there are a variety of higher education institutions located in the Planning Area including Antioch University Los Angeles and West Los Angeles College. Given the distribution of schools in the Planning Area, it is possible that future development and redevelopment allowed under the General Plan 2045, which may involve hazardous emissions or handling of hazardous materials and wastes, may occur within one-quarter mile of an existing or future school.

As described under Impacts HAZ-1 and HAZ-2, development allowed under the General Plan 2045 would be required to comply with existing federal, State, and local regulations related to hazardous materials, including General Plan 2045 Policies S-8.2, S-8.4, and S-8.6.

In particular, CCFD and Culver City Building and Safety Division coordinate review of building permits to ensure hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses and proper hazardous materials storage facilities. Future development (including redevelopment of existing developed sites) allowed under the General Plan 2045 would be required by Los Angeles County CUPA, the local CUPA, to store, manage, and dispose of the materials in accordance with the Unified Program. Therefore, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Furthermore, the City would review development applications for subsequent development under the Project for compliance with applicable regulations, the policies of the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not

result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-8: Hazardous materials. Local code enforcement actions are strengthened to minimize threats to public and health and safety from hazardous materials. For example, the risk of multiple releases caused by earthquakes, industrial uses, and activities within the IOF will be minimal.

S-8.2: Hazardous materials use, storage, and transport. Require businesses that use, store, or transport hazardous materials to adopt measures that protect public health and safety.

S-8.4: Disposal of hazardous waste and construction materials. Revise, update, and maintain standards to dispose of hazardous waste and construction materials properly and effectively.

S-8.6: Gas releases. Evaluate the potential for methane or hydrogen sulfide gas releases due to active or abandoned oil facilities or natural conditions. Ensure development is consistent with federal, State, and local safety guidelines, standards, and requirements related to soil gas releases.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to emitting hazardous materials within one-quarter mile of a school.

Hazardous Materials Sites

Threshold HAZ-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment.

Impact Statement HAZ-4: The Project would be required to comply with requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD, which would ensure that future development on a contaminated site does not create a significant hazard to the public or the environment. Therefore, the Project would result in a less than significant impact related to hazardous materials sites.

General Plan 2045

According to an EnviroStor search performed on May 25, 2023, there are a total of eight sites on the list that are located within the Planning Area, including two active sites. According to a GeoTracker search performed on May 25, 2023, there are a total of 114 sites on the list that are

located within the Planning Area. However, 97 of those listings have been closed and require no further action, three are inactive, and two are eligible for closure. The remaining 12 sites are actively being remediated, assessed, or are in a verification monitoring program. As such, future development allowed under the General Plan 2045 could occur on a contaminated site. In addition, other properties could be added to the lists if contamination is discovered during the construction or operation of future development.

As discussed in Impact HAZ-1, HAZ-2, HAZ-3, and Section 4.8.3, *Regulatory Framework*, any development on a contaminated site would be required to comply with mandatory regulations, which would ensure that the development does not create a significant hazard to the public or the environment. For instance, Cal/EPA is authorized by USEPA to enforce and implement certain federal hazardous materials laws and regulations. DTSC, a department of Cal/EPA, protects California and California residents from exposure to hazardous waste, primarily under the authority of the RCRA and the HSC. DTSC requirements include the need for written programs and response plans, such as HMBPs. DTSC programs include dealing with aftermath clean-ups of improper hazardous waste management; evaluation of samples taken from sites; enforcement of regulations regarding use, storage, and disposal of hazardous materials; and encouragement of pollution prevention.

As described under Impact HAZ-1, should any hazardous materials be inadvertently encountered during construction activities from future development allowed under the General Plan 2045, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. In reviewing individual project applications, the City would determine applicable regulations and General Plan 2045 policies, depending on the specific characteristics of the project type and/or project site during the development review process. Therefore, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not create a significant hazard to the public or environment as a result of locating development on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Furthermore, the City would review development applications for subsequent development under the Project for compliance with applicable regulations, policies of the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not create a significant hazard to the public or environment as a result of being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

No applicable proposed goals or policies were identified relevant to this threshold.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to hazardous materials sites.

Impairment or Interference with Emergency Response Plan

Threshold HAZ-5: The Project would have a potentially significant impact if implementation of the General Plan 2045 and Zoning Code Update would impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Statement HAZ-5: The Project would not interfere with implementation of the Culver City MJHMP or operations of CCFD, LACFD, CCPD, LACSD, or other agencies that would respond in the event of a disaster or major emergency in Culver City. Therefore, the Project would result in a less than significant impact related to impairment or interference with an emergency response plan.

General Plan 2045

Continued growth and development associated with implementation of the General Plan 2045 has the potential to strain the emergency response and recovery capabilities of federal, State, and local governments. Coordination among various City and County departments is necessary to ensure adequate emergency response.

The Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. The goals of this plan are to outline a strategy to prepare for, respond to, and recover from an emergency or disaster for 88 cities, 137 unincorporated communities and 288 special districts in the county. In addition, the City's MJHMP provides a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The General Plan 2045 contains policies that aim to continually strengthen emergency response and emergency evacuation such as continuing to update emergency-related planning documents (including the MJHMP) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science (Policy S-1.1); continuing to incorporate the hazards and mitigation measures identified in the MJHMP into City emergency planning, capital projects, and programs (Policy S-1.2); continuing to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations (Policy S-1.3); and requiring all development proposals to identify existing evacuation routes or establish new evacuation routes as needed (S-7.14).

Furthermore, CCFD provides emergency response services within the Planning Area, including hazardous materials emergency response. The City's participation in the SEMS as required under Government Code Section 8607(a) allows Culver City to receive State support and funding in the event of an emergency. SEMS incorporates the use of the Incident Command System, California

Disaster and Civil Defense Master Mutual Aid Agreement, the Operational Area concept, and multiagency or interagency coordination. State agencies are required to use SEMS, and local government entities must use SEMS in order to be eligible for any reimbursement of response-related costs under the State's disaster assistance programs. These resources would be utilized by Culver City in an emergency event. Implementation of the General Plan 2045 would not interfere with the implementation of the Culver City MJHMP because the MJHMP is being updated concurrently with the General Plan 2045 for consistency and the plan would be implemented by the City and CCUSD. In addition, the Project would not interfere with operations of CCFD, LACFD, CCPD, Los Angeles Sheriff's Department, or other agencies (see Section 4.14, *Public Services*) that would respond in the event of a disaster or major emergency in Culver City. No project would be permitted to block any designated evacuation routes.

Evacuation of the Planning Area, if necessary because of an emergency, would be conducted by the City's Public Works Department, LACSD, and LACFD. An evacuation route vulnerability assessment was prepared as part of the City's Evacuation Route Capacity and Viability Study. Evacuation route vulnerability can relate to physical features along an evacuation route that can be damaged during emergency scenarios and cause the evacuation route to be disrupted and unusable. Evacuation route vulnerability can also be expressed in term of vulnerability to residents where development areas are isolated and/or areas that have access to only one evacuation route. Residential areas that only have one access point to primary evacuation routes include Higuera Street Neighborhoods, Palm Court Retirement Living; Tompkins Way Neighborhood; Clarmon Place Neighborhoods; Huntley Avenue Neighborhood. In the evacuation scenarios prepared, these neighborhoods could be exposed to an increased risk due to the lack of egress opportunities and would be given earlier evacuation consideration. As such, the City has a process in place and growth associated with the General Plan 2045 would not conflict with the process or interfere with evacuation routes. Implementation of the General Plan 2045 would not impair or interfere with an emergency response plan. Therefore, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. Furthermore, the City would review development applications for subsequent development for compliance with applicable regulations, policies of the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-1: Community resilience. The City proactively advances community resilience and is prepared for all hazards, including climate disruption.

S-1.1: Emergency-related planning documents. Continue to update emergency-related planning documents (including the Multi-Jurisdictional Hazard Mitigation Plan) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science.

S-1.2: Multi-Jurisdictional Hazard Mitigation Plan. Continue to incorporate the hazards and mitigation measures identified in the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) into City emergency planning, capital projects, and programs.

S-1.3: Evacuation plan. Continue to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations.

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.14: Evacuation routes. Require all development proposals to identify evacuation routes or establish new evacuation routes as needed.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to impairment or interference with an emergency response plan.

Wildland Fire Hazards

Threshold HAZ-6: The Project would have a potentially significant impact if implementation of the General Plan 2045 and Zoning Code Update would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impact Statement HAZ-6: The Project would be required to adhere to building codes and review by CCFD to reduce fire hazards, which would ensure that people or structures are not exposed, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the Project would result in a less than significant impact related to wildland fire hazards.

General Plan 2045

A wildland fire is an uncontrolled fire in areas of little or no development. However, these fires can quickly spread to the urban/wildland interface where development meets expanses of vegetative fuels. As shown in **Figure 4.14-2, Fire Hazard Zone within the Planning Area**, in Section 4.14, *Public Services*, the majority of the Planning Area is not within a VHFHSZ; however, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair

Hills neighborhoods and areas within West Los Angeles College and the IOF, as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Future development allowed under the General Plan 2045 could include the development of additional residential uses in these neighborhoods, which could expose additional people and structures to wildland fire hazards.

Fire suppression services in the Planning Area are provided by CCFD and LACFD. To help protect the city and its residents from fire hazards, the City has building and fire codes that provide required regulations that must be implemented in development projects. The fire chief may also use their authority to instate certain building, planning, or landscaping requirements.

The City adopted the 2022 CFC, as amended, which is based on the 2021 IFC. These codes are revised on a triennial cycle. Provisions include sprinkler and fire hydrant requirements in new structures and remodels, methods intended to mitigate wildfire exposure, hazardous vegetation and fuel management, road widths and configurations designed to accommodate the passage of fire trucks and engines, methods to create defensible space around all buildings and structures, and requirements for minimum fire flow rates for water mains. The fire chief is authorized and directed to enforce the provisions of the CFC throughout the city. The City also adopted the most recent (currently 2022) version of the California Building Code (CBC) that includes sections on fire-resistant construction material requirements based on building use and occupancy. The construction requirements are a function of building size, purpose, type, materials, location, proximity to other structures, and the type of fire suppression systems installed.

Furthermore, the General Plan 2045 contains policies to minimize the risk of fire hazard such as continuing to adopt and enforce the CFC and Municipal Fire Code Amendments for new construction in fire hazard areas, including the use of sprinklers in residential structures (Policy S-7.13); developing stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential (S-7.10); requiring new development to meet the State's minimum standards for fire safety unless the City's Municipal Code defines more conservative standards (Policy S-7.5); and developing design standards and strengthening performance review and code enforcement programs to ensure proposed development incorporates fire prevention features (Policy S-7.4). Given the State of California, County of Los Angeles, and Culver City require adherence to building codes and review by CCFD to reduce fire hazards, implementation of the General Plan 2045 would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Furthermore, the City would review development applications for compliance with applicable regulations, policies of the General Plan 2045, the City's Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project

would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety

Goal S-7: Fire Hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.4: Fire prevention code enforcement. Develop design standards and strengthen performance review and code enforcement programs to ensure proposed development incorporates fire prevention features.

S-7.5: Comply with minimum standards for fire safety. Require new development to meet the State’s minimum standards for fire safety unless the City’s Municipal Code defines more conservative standards. These standards include:

- Adequate road widths to accommodate emergency vehicles and developments; and
- Enforcing Municipal Code provisions that require automatic fire extinguishing systems and other fire safety standards.

S-7.10: Fire-safe landscapes. Encourage residents to plant and maintain drought-resistant, fire-retardant landscape species on slopes to reduce the risk of brush fire and soil erosion in areas adjacent to canyons. Develop stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential.

S-7.13: Fire code enforcement. Continue to enforce the California Fire Code and Municipal Fire Code Amendments for new construction in fire hazard areas, like using sprinklers in residential structures.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to wildland fire hazards.

4.8.5 Cumulative Impacts Analysis

The geographic scope of the cumulative impact analysis for hazards and hazardous materials is the Planning Area as well as the adjacent areas of the city of Los Angeles and unincorporated areas of Los Angeles County.

Routine Use, Transportation, Disposal, or Accidental Release of Hazardous Materials

The Project’s incremental contribution to cumulative impacts would not be significant. As previously discussed, future development allowed under the Project would result in additional residential and nonresidential development, as well as other private and public improvements throughout the Planning Area, which could result in an increase in the routine transport, use,

and disposal of hazardous materials. Potential impacts would be reduced less than significant with compliance with the CCR and implementation of a SWPPP to prevent hazardous materials spills and protect public safety. To ensure that development allowed under the General Plan 2045 would result in a less than significant contribution to cumulative impacts, applications for development would be reviewed by the City for compliance with General Plan 2045 policies and the Zoning Code Update to further reduce potential impacts related to sites with known hazardous materials to a less than significant level.

In addition, future development allowed under the Project would be required to comply with all requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD related to the transport, use, and disposal of hazardous materials. Accordingly, development allowed under the Project would not result in physical changes that would incrementally contribute to a significant environmental effect. For these reasons, the Project's contribution to cumulative impacts would be considered less than significant.

Cumulative projects would be subject to the requirements and regulations set forth by the USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD related to the transport, use, and disposal of hazardous materials. Accordingly, cumulative development would not result in physical changes that would result in a significant environmental effect. Cumulative projects would also be required to implement a SWPPP and comply with the CCR during construction, site grading, excavation operations, and building demolition. For these reasons, the Project in conjunction with cumulative projects would have a less than significant cumulative effect.

Emit Hazardous Materials Within One-Quarter Mile of a School

The potential exists for the routine transport of hazardous materials and waste to result in the release of hazardous materials from an accident near a school site or the release of contamination near a school site resulting from the development of a site that has been previously contaminated, which could result in a potentially significant cumulative impact. However, compliance with existing federal, State, and local regulations related to the transport, use, and disposal of hazardous materials mentioned above in Impacts HAZ-1 and HAZ-2 would reduce potential Project and cumulative impacts related to handling hazardous materials and waste near a school to a less than significant level. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable and cumulative impacts would be less than significant.

Hazardous Materials Sites

Existing hazardous materials sites could potentially be impacted if cumulative development is proposed on a previously-identified site. However, as discussed under Impact HAZ-4, any development on a contaminated site would be required to comply with mandatory regulations, which would ensure it does not create a significant hazard to the public or the environment. In addition, should any hazardous materials be inadvertently encountered during construction activities from cumulative development, the handling, transportation, and disposal of hazardous

materials would be required to comply with the requirements and regulations set forth by Culver City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. In reviewing individual cumulative project applications, local jurisdictions in the area would determine which regulations and general plan policies apply, depending on the specific characteristics of the project type and/or project site during the development review process. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable and cumulative impacts related to hazardous materials sites would be less than significant.

Emergency Response and Evacuation Plans

The General Plan 2045's incremental contribution to cumulative impacts would not be significant. To ensure a less than significant contribution to cumulative impacts, future development allowed under the Project would be required to implement all applicable regulations and policies during the design review process. The City would review development applications for subsequent development under the Project for compliance with applicable regulations, the policies of the General Plan 2045 and Zoning Code Update related to emergency response plans and emergency evacuation plans. In addition, future development allowed under the Project would be considered in the context of the City's General Plan Safety Element and MJHMP and is not expected to impair implementation of or physically interfere with the plan. Therefore, the Project's contribution to cumulative impacts would be considered less than significant.

The CCFD manages and maintains emergency plans and training of City staff and community members and focuses on activities that will prepare the community to take care of itself in the period immediately following a local disaster. For example, the CERT program educates volunteers about disaster preparedness for the hazards that may impact their area and trains them in basic disaster response skills, such as first aid, light search and rescue, minor fire suppression, and other skills that are critical in the first few hours of disaster. In addition, Culver City has a MJHMP that is regularly updated. Adjacent jurisdictions also have emergency response plans and emergency evacuation plans. Furthermore, larger regional and statewide resource areas are regulated by State agencies to address larger-scale statewide issues. For these reasons, cumulative impacts associated with emergency response and evacuation plans would be less than significant.

Wildland Fire Hazards

Similar to future development under the Project, cumulative projects would be required to comply with the General Plan 2045 policies and implementation actions as well as local, State, and federal regulations, which would ensure that people or structures in the region are not exposed, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. For this reason, the contribution of the Project to this impact would not be cumulatively considerable. Therefore, cumulative impacts related to wildland fire hazards would be less than significant.

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4.9 Hydrology and Water Quality

4.9.1 Introduction

This section evaluates potential environmental impacts to hydrology and water quality conditions in the Planning Area from implementation of the Project, including potential impacts related to water quality standards and waste discharge requirements, groundwater supplies and groundwater recharge, drainage patterns, and water quality control and sustainable groundwater management plans. This section also provides context regarding the Planning Area's existing hydrologic setting, surface water quality, groundwater, planned improvements, and flooding hazards, as well as relevant federal, State, and local regulations and programs. Hydrology refers to the distribution and circulation of water, both on land and underground. Water quality refers to the quality of surface and groundwater. Surface water is on the surface of the land and includes lakes, rivers, streams, and creeks. Groundwater is below the surface of the earth.

Wetlands and waters of the United States are discussed in Section 4.3, *Biological Resources*, and water supply and wastewater conveyance and treatment are discussed in Section 4.18, *Utilities and Service Systems*.

4.9.2 Environmental Setting

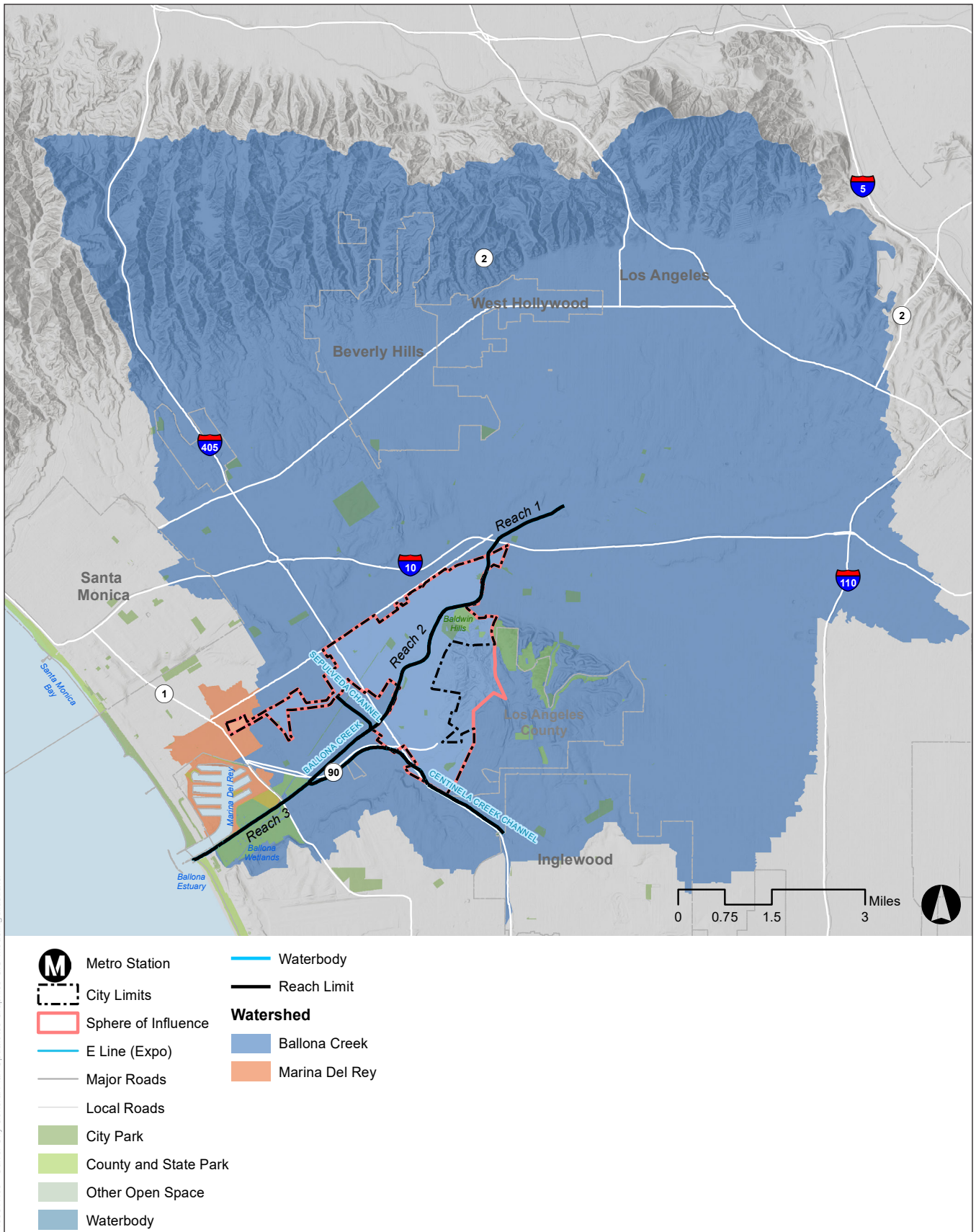
Surface Water

Hydrologic Setting

The California Department of Conservation has divided California into 10 hydrologic regions, where the Planning Area is located in the Los Angeles Region under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB).¹ A hydrologic region is the area drained by a river system or a segment of a river system, a closed basin(s), or a group of streams forming a coastal drainage area. The Los Angeles Region encompasses all coastal drainages flowing to the Pacific Ocean between Rincon Point (on the Coast of Western Ventura County) and the eastern Los Angeles County line, as well as the drainages of five coastal islands (Anacapa, San Nicolas, Santa Barbara, Santa Catalina, and San Clemente). The region also includes all coastal waters within three miles of the continental and island coastlines. A watershed is the area of land where all of the water that is under it or drains off of it goes into the same place. Los Angeles County includes part or all of six major watersheds.² The Planning Area is located predominantly within the Ballona Creek Watershed with a few parcels on the western side of the city located within the Marina Del Rey Watershed, as shown in **Figure 4.9-1, Existing Hydrologic Setting**.

¹ County of Los Angeles, 2014. Los Angeles County General Plan Update Draft Environmental Impact Report. Figure 5.9-1, Hydrologic Regions. Available at: https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf. Accessed March 2023.

² County of Los Angeles, 2014. Los Angeles County General Plan Update Draft Environmental Impact Report. Figure 5.9-2, Major Watersheds. Available at: https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf. Accessed March 2023.



SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; NHD, 2018; CA Water Board, 2018; ESRI, 2021

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Figure 4.9-1
Existing Hydrologic Setting

The Ballona Creek Watershed is located on the coastal plain of the Los Angeles Basin and includes a portion of the Santa Monica Mountains to the north and the Baldwin Hills to the south.³ The Ballona Creek Watershed is approximately 128 square miles and extends across the cities of Culver City, Beverly Hills, and West Hollywood, and portions of the cities of Los Angeles, Inglewood, Santa Monica, and unincorporated areas of the County of Los Angeles. The Ballona Creek Watershed's main water bodies are Ballona Creek, which runs centrally through the city, and Ballona Estuary located southwest of the city adjacent to the Pacific Ocean. Ballona Creek runs through the center of the Planning Area, extending for roughly 9.5 miles from the northeast portion of the city to the western boundary, where it continues to Ballona Estuary and the Pacific Ocean. Ballona Creek and the Estuary are collectively divided into three hydrological units:

- Ballona Creek Reach 1 is approximately two miles long from Cochran Avenue (which is outside of the city limits) to National Boulevard, in the northeastern portion of the city. This portion of the creek is channelized with vertical concrete walls.
- Ballona Creek Reach 2 extends through the Planning Area, and is approximately four miles long between National Boulevard, in the northeast portion of the city, and Centinela Avenue where Ballona Estuary starts (outside of the Planning Area). Reach 2 is also channelized for the most part, with trapezoidal walls.
- Ballona Estuary Reach 3 is located entirely outside the Planning Area and starts at Centinela Creek and continues to the Pacific Ocean. This portion of the creek is approximately 3.5 miles of soft-bottom channel and experiences tidal inundation.

Major tributaries to Ballona Creek include Sepulveda Canyon Channel and the Centinela Creek.⁴ Other water bodies in the Ballona Creek Watershed include the Del Rey Lagoon and the Ballona Wetlands, which are both connected to the Ballona Estuary through tide gates and are both outside of the Planning Area.

The Marina Del Rey Watershed is also located on the coastal plain of the Los Angeles Basin and is considered a sub-watershed located within the larger Santa Monica Bay Watershed.⁵ The Marina Del Rey Watershed is approximately 3 square miles and extends across the portions of the cities of Santa Monica, Los Angeles and Culver City and unincorporated areas of the County of Los Angeles.⁶ The Marina Del Rey Watershed contains the Marina Del Rey Harbor, which is

³ Ballona Creek Watershed Management Group. 2016. Enhanced Watershed Management Program for the Ballona Creek Watershed. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/ballona_creek/BallonaCreek_RevisedEWMP_corrected2016Feb1.pdf. Accessed March 2023.

⁴ Ballona Creek Watershed Management Group. 2016. Enhanced Watershed Management Program for the Ballona Creek Watershed. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/ballona_creek/BallonaCreek_RevisedEWMP_corrected2016Feb1.pdf. Accessed March 2023.

⁵ Los Angeles County Flood Control District (LACFCD). 2018. Marina Del Rey Enhanced Watershed Management Program Plan. https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/watershed_management/marina_delrey/20180226MdREWMPRevised.pdf. Accessed March 2023.

⁶ Los Angeles County. 2023. Marina Del Rey Watersehd webpage. <https://dpw.lacounty.gov/wmd/watershed/mdr/index.cfm>. Accessed March 2023.

open to the Pacific Ocean through its main channel and shares a common breakwater with Ballona Creek, as well as the Venice Canals and the tributary area to the Ballona Lagoons.⁷

Surface Water Quality

Surface water quality can be affected by many variables, including but not limited to land use, hydrology, meteorology, geology, and soils. In general, urban stormwater runoff occurs following precipitation events (also known as wet weather runoff), especially during the early phases of precipitation events called first-flush, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may be found in stormwater from urban areas include sediments, trash, bacteria, metals, nutrients, organics, and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems.

Dry weather runoff also occurs in urban areas, which can be attributed to watering lawns, washing vehicles, or hosing down sidewalks. Pollutants in dry weather runoff can include fertilizer, pesticides, and pet waste, which are also directed into drainage systems.

In receiving waters, stormwater runoff can discharge excess sediments, which can cause high turbidity and rapid accumulation of sediments in lakes and ponds, with adverse impacts on biological organisms. In urban areas, metals such as zinc, copper, and lead, which can cause toxic effects in high concentrations, are most commonly associated with surface runoff. Additionally, other toxic elements, especially those associated with hazardous waste, can be present within surface water flows.

Receiving Waters

Under the Clean Water Act Section 303(d), states are required to submit to the United States Environmental Protection Agency (USEPA) a list identifying waters within its boundaries not meeting water quality standards (impaired waters) and the water parameter (i.e., pollutant) not being met. The 2018 Clean Water Act Section 303(d) List of Impaired Waters, approved by the USEPA in 2021 and is current as of 2023, is a combined list of all water quality limited segments (WQLSs) and associated pollutants identified by the State Water Resources Control Board (SWRCB) as requiring a total maximum daily load (TMDL) under Section 303(d).

As illustrated in Figure 4.9-1, the receiving waterbodies that receive stormwater runoff from the Planning Area include Ballona Creek, Centinela Creek, Ballona Creek Estuary, Ballona Wetlands, Dockweiler Beach, Santa Monica Bay, and Marina Del Rey Harbor. **Table 4.9-1, *Receiving Waters for Urban Runoff in Culver City***, lists the Section 303(d) impairments for the city's receiving waters as well as the beneficial uses for receiving waters as designated by LARWQCB.

⁷ LACFCD. 2018. Marina Del Rey Enhanced Watershed Management Program Plan. https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/watershed_management/marina_delrey/20180226MdREWMPrevised.pdf. Accessed March 2023.

Designated beneficial uses allow for appropriate water quality objectives and programs to maintain or enhance water quality.

**TABLE 4.9-1
 RECEIVING WATERS FOR URBAN RUNOFF IN CULVER CITY**

Receiving Waters	303(d) List Impairments ^a	Designated Beneficial Uses ^b
Ballona Creek	Cadmium (sediment), Coliform Bacteria, Dissolved Copper, Cyanide, Lead, Selenium, Toxicity, Trash, Viruses (enteric), Zinc	Reach 1: Municipal and Domestic Supply (MUN) (potential), Warm Freshwater Habitat (WARM) (potential), Wildlife Habitat (WILD), Water Contact Recreation (REC1) (potential), Non-contact Water Recreation (REC2) Reach 2: MUN (potential), WARM (potential), WILD (potential), REC1 (potential), Limited Water Contact Recreation (LREC1), REC2
Centinela Creek (Channel)	None	None
Ballona Creek Estuary	Cadmium, Chlordane (tissue and sediment), Indicator Bacteria, Copper, DDT, Lead (sediment), Polycyclic Aromatic Hydrocarbons (PAHs) (sediment), Polychlorinated Biphenyls (PCBs) (tissue and sediment), Toxicity, Silver, Zinc (sediment)	Navigation (NAV), Commercial and Sport Fishing (COMM), Estuarine Habitat (EST), Marine Habitat (MAR), WILD, Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), Spawning Reproduction, and/or Early Development (SPWN), Shellfish Harvesting (SHELL), REC1, REC2
Ballona Wetlands	Exotic Vegetation, Habitat Alterations, Reduced Tidal Flushing, Trash	EST, WILD, RARE, MIGR, SPWN, Wetland Habitat (WET), REC1, REC2
Dockweiler Beach	Indicator Bacteria	Industrial Service Supply (IND), NAV, COMM, MAR, WILD, SPWN (potential), REC1, REC2
Santa Monica Bay	DDT (tissue and sediment), Trash, PCBs (tissue and sediment), mercury, arsenic,	NAV, COMM, MAR, WILD, MIGR, SPWN, SHELL, REC1, REC2
Marina Del Rey Harbor (Back Basins)	Chlordane (tissue and sediment), Copper (sediment), DDT (tissue), Dieldrin (tissue), Dissolved Oxygen, Indicator Bacteria, Lead (sediment), PCBs (tissue and sediment), Sediment Toxicity, Zinc (sediment)	Harbor: NAV, COMM, MAR, WILD, SHELL, REC1, REC2 Entrance Channel: NAV, COMM, MAR, WILD, RARE, SHELL, REC1, REC2 All Other Areas: NAV, COMM, MAR, WILD, RARE, SHELL, REC1 (potential), REC2
Marina Del Rey Harbor (Beach)	None	Public Beach Areas: NAV, COMM, MAR, WILD, RARE, REC1, REC2

SOURCES:

^a State Water Resources Control Board. 2018 California 2018 Integrated Report [Clean Water Act Section 303(d) List and 305(b) Report]

^b LARWQCB. 2019. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.

As shown in Table 4.9-1, Ballona Creek and Estuary, Dockweiler Beach, Santa Monica Bay, and Marina Del Rey Harbor and back basins are considered impaired water bodies; however, Ballona Creek is the only impaired water body within the Planning Area. To address the impaired conditions of Ballona Creek, multiple entities and agencies monitor water quality and implement various programs to prevent further creek degradation (e.g., Ballona Wetlands Foundation, Friends of Ballona Wetlands Education/Ecology Center, Santa Monica Bay Restoration Project, LARWQCB Trash TMDL for Ballona Creek and Wetland).

Stormwater Drainage System

Urban runoff and stormwater in the Planning Area are managed by the Culver City Public Works Department Environmental Programs and Operations Division.⁸ The City is required to comply with the Municipal Separate Storm Sewer System (MS4) permit issued by the LARWQCB. The MS4 permit requires the City to implement best management practices (BMPs) that would improve water quality in the Ballona Creek Watershed Plan. The City is a member of the Ballona Creek Watershed Management Group, along with the cities of Beverly Hills, Inglewood, Los Angeles, Santa Monica, West Hollywood, and unincorporated areas of Los Angeles County. The City is also a member of the Marina Del Rey Watershed, which includes the cities of Los Angeles and Santa Monica and the County of Los Angeles.

Groundwater

Groundwater Basin Hydrology

The California Department of Water Resources (DWR) defines state groundwater basins based on geologic and hydrogeologic conditions. Groundwater basins are further divided into forebay and pressure areas. In general, forebay areas refer to areas of higher permeability and recharge to underlying aquifers. Pressure areas refer to areas where groundwater percolation is impeded by deposits of low permeability and where groundwater is confined.

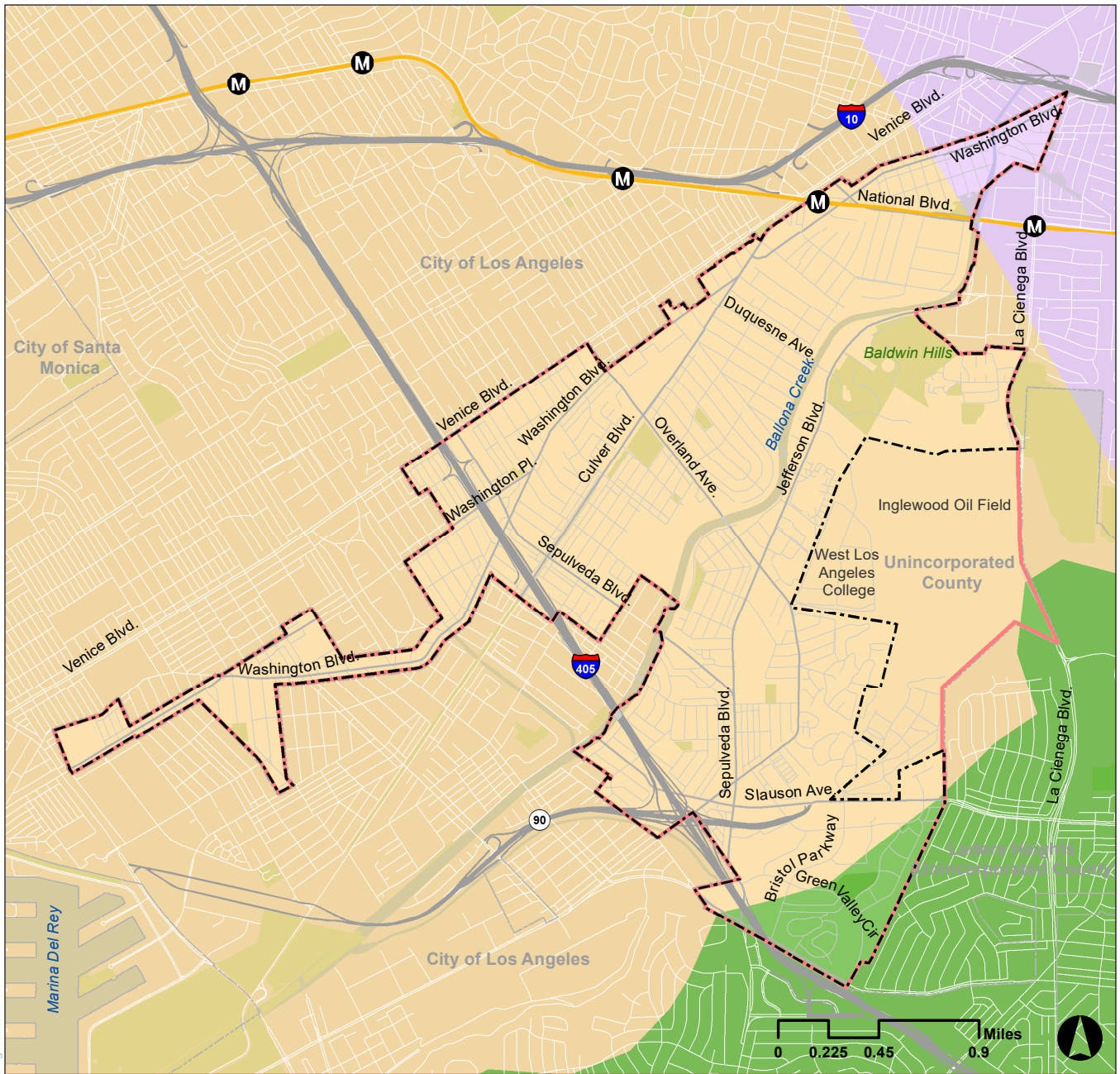
According to the DWR, the Planning Area is located within the Coastal Plain of the Los Angeles Groundwater Basin. The Coastal Plain of Los Angeles Groundwater Basin is bound on the north by the Santa Monica Mountains, the Hollywood fault, and the Elysian, Repetto, Merced, Puente, and Chino Hills areas; on the west by the Pacific Ocean; on the east by the Santa Ana Mountains; and on the south by the San Joaquin Hills and the Pacific Ocean.⁹ The water bearing units in the Coastal Plain of the Los Angeles Groundwater Basin include multiple unconfined and confined aquifers.

In the vicinity of the Planning Area, the Coastal Plain of the Los Angeles Groundwater Basin is divided into three subbasins, consisting of the Central Subbasin, Santa Monica Subbasin, and the West Coast Subbasin. As shown in **Figure 4.9-2, Existing Groundwater Subbasins within the Planning Area**, the majority of the Planning Area is located within the Santa Monica Subbasin, while a small eastern portion of the Planning Area is located in the Central Subbasin and the southernmost portion is located in the West Coast Subbasin. The primary forebay areas are identified in the northeast portion of the Central Groundwater Sub-Basin. The rest of the Central Groundwater Sub-Basin and the entire West Coast Groundwater Sub-Basin are identified as pressure areas.¹⁰ Each groundwater subbasin is described in greater detail below.

⁸ Culver City. 2023. Stormwater and Urban Runoff. <https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Stormwater-and-Urban-Runoff>. Accessed March 2023.

⁹ California Department of Water Resources. 2015. California's Groundwater Update 2013: A Compilation of Enhanced Content for California Water Plan Update 2013. <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Data-and-Tools/Files/Statewide-Reports/California-Groundwater-Update-2013/California--Groundwater-Update-2013---Chapter-6---South-Coast.pdf>. Accessed March 2023.

¹⁰ Department of Water Resources. 2015. California's Groundwater Update 2013: A Compilation of Enhanced Content for California Water Plan Update 2013.



- | | |
|----------------------|-------------------------------------------------------|
| City Limits | Coastal Plain of Los Angeles Groundwater Basin |
| Sphere of Influence | Central Subbasin |
| Metro Station | Santa Monica Subbasin |
| E Line (Expo) | West Coast Subbasin |
| Major Roads | |
| Local Roads | |
| Parks and Open Space | |
| Waterbody | |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; DWR, 2000; ESRI, 2021

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Figure 4.9-2
Existing Groundwater Subbasins within
the Planning Area



Santa Monica Subbasin

The Santa Monica Subbasin underlies the northwestern portion of the Coastal Plain of Los Angeles Groundwater Basin.¹¹ It is bounded by impermeable rocks of the Santa Monica Mountains to the north, the Ballona Escarpment to the south, the Pacific Ocean to the west, and the Inglewood fault to the east. The Ballona Escarpment is an abandoned erosional channel from the Los Angeles River.¹² The Bellflower, Ballona, and Silverado aquifers are present in the subbasin. Replenishment of groundwater in the Santa Monica Subbasin is mainly percolation of precipitation and surface runoff from the Santa Monica Mountains. Groundwater in the subbasin moves mainly southward towards the Ballona Gap (an erosional channel cutting into and across the Inglewood fault), then flows toward the ocean.¹³ Total storage of the subbasin is estimated to be approximately 1,100,000 acre-feet.¹⁴ Under the Sustainable Groundwater Management Act (SGMA), the Santa Monica Subbasin is considered a “medium” priority basin.¹⁵ Groundwater recharge for the Santa Monica subbasin is a result mainly from percolation of precipitation and surface runoff from the Santa Monica Mountains.¹⁶

Central Subbasin

The Central Subbasin occupies a large portion of the southeast part of the Coastal Plain of Los Angeles Groundwater Basin.¹⁷ This subbasin is bounded to the north by a surface divide called the La Brea high and to the northeast and east by the Elysian, Repetto, Merced, and Puente Hills. The southeast boundary between the Central Subbasin and Orange County Groundwater Basin roughly follows Coyote Creek, which is a regional drainage province boundary. The southwest boundary is formed by the Newport Inglewood fault system and the associated folded rocks of the Newport Inglewood uplift.

As previously detailed, the Central Subbasin includes forebay areas (areas of higher permeability that provide recharge to underlying aquifers). This subbasin includes the Los Angeles and Montebello forebays, both of which have unconfined groundwater conditions and relatively interconnected aquifers that extend up to 1,600 feet deep to provide recharge to the aquifer system of this subbasin.¹⁸ Throughout much of the subbasin, the aquifers are confined, but areas with semi-permeable aquicludes (a geologic formation or stratum that confines water in

¹¹ California Department of Water Resources. 2004a. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Santa Monica Subbasin.

¹² California Department of Water Resources. 2004b. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, West Coast Subbasin.

¹³ California Department of Water Resources. 2004a. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Santa Monica Subbasin.

¹⁴ California Department of Water Resources. 2004a. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Santa Monica Subbasin.

¹⁵ Golden State Water Company. 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

¹⁶ California Water Boards. 2004. California Groundwater Bulletin 118 – Coastal Plain of Los Angeles Groundwater Basin, Santa Monica Subbasin.

¹⁷ Department of Water Resources. 2004c. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Central Subbasin.

¹⁸ Department of Water Resources (DWR). 2004c. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Central Subbasin.

an adjacent aquifer) allow some interaction between aquifers. Aquifers in the Central Subbasin include: Gaspur, Semiperched, Bellflower, Gardena, Gage, Silverado, Lynwood, and Sunnyside.

Total storage capacity of the Central Subbasin is approximately 13,800,000 acre-feet.¹⁹ Groundwater enters the Central Subbasin through surface and subsurface flow and by direct percolation of precipitation, stream flow, and applied waters. Also, groundwater replenishes the aquifers dominantly in the forebay areas. The Central Subbasin was adjudicated in 1965 (meaning groundwater rights were determined by the courts), and the DWR was appointed as water master. Under the SGMA, the unadjudicated portion of the Central Subbasin is considered a “high” priority basin and must be managed under a Groundwater Sustainability Plan.²⁰ The major groundwater recharge basins in the Central Basin are the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers, in the city of Montebello and city of Pico Rivera.

West Coast Subbasin

The West Coast Subbasin is bounded to the north by the Ballona Escarpment, to the east by the Newport-Inglewood fault zone, and to the south and west by the Pacific Ocean and the Palos Verdes Hills. The surface of the subbasin is crossed in the south by the Los Angeles River and the San Gabriel River. In 1961, the West Coast Subbasin was adjudicated, and DWR is retained as water master. Aquifers present in the West Coast Subbasin include: Semiperched, Bellflower, Gaspur, Gardena, Gage, Lynwood, Silverado, and an unnamed aquifer. The groundwater in underlying aquifers is confined throughout most of the Basin, though the Gage and Gardena aquifers are unconfined where water levels have dropped below the Bellflower aquiclude.

The storage capacity of the primary water producing aquifer, the Silverado aquifer, is estimated to be approximately 6,500,000 acre-feet.²¹ Natural replenishment of groundwater in the West Coast Subbasin is largely limited to underflow from the Central Subbasin through and over the Newport-Inglewood fault zone. Seawater intrusion occurs in some aquifers that are exposed to the ocean offshore. Also, minor replenishment occurs from the infiltration of surface inflow from both the Los Angeles and San Gabriel Rivers into the uppermost aquifers. Groundwater recharge in the West Coast Basin is primarily done through injection wells.

Existing Groundwater Use and Supply

The Golden State Water Company (GSWC), which provides water to the city, has not used groundwater as a supply source since 1998.²² In 2004, GSWC sold some groundwater pumping rights to the City of Santa Monica. However, GSWC still has historical water rights in the Santa Monica Subbasin and the unadjudicated portion of the Central Subbasin. SGMA requires that groundwater basins in California create Groundwater Sustainability Agencies (GSA) and Groundwater Sustainability Plans (GSP) to sustainably manage groundwater conditions in

¹⁹ Department of Water Resources (DWR). 2004c. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Central Subbasin.

²⁰ Golden State Water Company (GSWC). 2016. 2015 Urban Water Management Plan: Culver City.

²¹ Department of Water Resources. 2004c. California Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Central Subbasin.

²² Golden State Water Company. 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

impacted groundwater basins. Groundwater basins that are medium priority basins that are not adjudicated must complete a GSP no later than January 2022.²³ The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed in 2017 between the City of Santa Monica, City of Beverly Hills, City of Los Angeles, City of Culver City, and County of Los Angeles to develop a GSP for the Santa Monica Basin.²⁴ The Santa Monica Groundwater Subbasin GSP was submitted to the California DWR in January 2022.²⁵ This action may limit the use of the GSWC's Culver City System's single well, the Sentney well, in the future.

The Water Replenishment District (WRD) manages the groundwater replenishment and groundwater quality activities for the West Coast and Central Basins. The WRD annually analyzes its monitoring well network to test for more than 100 water quality constituents, focusing on 11 key constituents that represent overall groundwater quality in the basins: total dissolved solids (TDS), iron, manganese, chloride, nitrate, trichloroethylene (TCE), tetrachloroethylene (PCE), arsenic, perchlorate, hexavalent chromium, and 1,4-dioxane. Since 2018, WRD has also completed a district-wide assessment for presence of per- and polyfluoroalkyl substance (PFAS) constituents, which are also included in their water quality reports. Overall, groundwater in the Los Angeles Coast Basin continues to be of high quality that is suitable for potable and non-potable uses, with only some areas facing poor water quality due to natural or anthropogenic sources that WRD monitors.²⁶

Flooding Hazards

Flooding occurs when a waterway, either natural or artificial, receives more water than it is capable of conveying, causing the water level in the waterway to rise. Depending on how long these conditions last and the amount of water the waterway receives in proportion to its capacity, the rising water level may eventually overtop the waterway's banks or other boundaries to the drainage area, resulting in flooding in the surrounding area. The severity of a flood event also depends on the local topography and the ability of the soil in the area to absorb water. Floods often occur during heavy precipitation events, when the amount of rainwater exceeds the capacity of storm drains or flood control channels. Floods can also happen when infrastructure, such as levees, dams, or culverts fail, or when a section of drainage infrastructure fails, and water cannot be drained from an area fast enough. These failures can be linked to precipitation events or can be a consequence of other emergencies, such as earthquakes.

The main waterway in the Planning Area is Ballona Creek, which runs approximately 9.5 miles from the Mid-Wilshire neighborhood of Los Angeles through the city and out to the Pacific

²³ Golden State Water Company. 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

²⁴ Golden State Water Company. 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

²⁵ California Department of Water Resources. 2023a. Groundwater Sustainability Plan 4-011.01 SANTA MONICA. <https://sgma.water.ca.gov/portal/gsp/preview/129>. Accessed March 2023.

²⁶ Water Replenishment District of Southern California, 2021. Regional Groundwater Monitoring Report Water Year 2019–2020. March.

Ocean at Marina Del Rey.²⁷ Ballona Creek was channelized, straightened, and deepened in the 1930s to control flooding. A tributary of Ballona Creek, Centinela Creek, runs along part of the community's southern border and was channelized in the 1960s.

According to the Federal Emergency Management Agency (FEMA), while the majority of the Planning Area is not located within a flood zone, there are various small pockets within the Planning Area that are located within a 100-year flood zone, as shown in **Figure 4.9-3, Flood Zones in the Planning Area**. The northern area is bounded roughly by Ballona Creek, Fairfax Avenue, and Adams Boulevard and is located within a 100-year flood zone for a 1 to 3-foot flood, meaning that there is a one in 100 chance that a flood event sufficient to cause 1 to 3 feet of inundation will occur in any given year (Zone AO).²⁸ 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 Sentney 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 Planning Area, 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).

Tsunami and Seiche Hazards

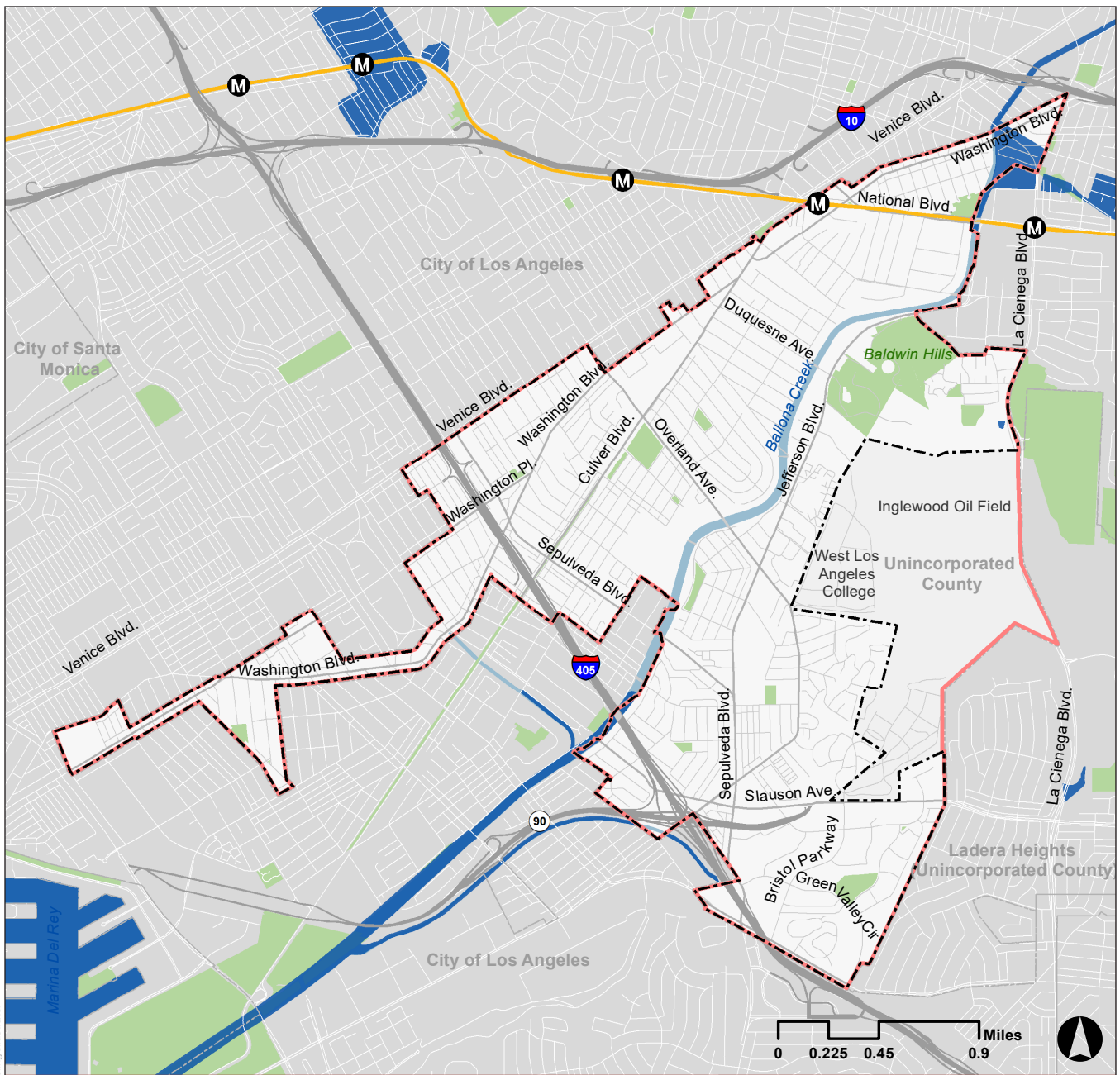
Tsunamis are ocean waves generated by vertical movement of the sea floor, normally associated with earthquakes or volcanic eruptions. The Planning Area is approximately 1.5 miles inland from nearby coastal areas, which is considered to be located outside of tsunami inundation zones according to the California Department of Conservation.²⁹

Seiches are oscillations of enclosed or semi-enclosed bodies of water that result from seismic events, wind stress, volcanic eruptions, underwater landslides, and local basin reflections of tsunamis. While Ballona Creek runs through the Planning Area, the creek is not considered an open body of water where seiches could occur. Furthermore, the Planning Area does not contain nor is it adjacent to open bodies of water subject to seiches.

²⁷ Culver City. 2017. IOF Specific Plan Project Draft Environmental Impact Report. Available at <https://www.culvercity.org/files/assets/public/documents/city-manager/inglewood-oil-field/environmental-review-process/toc091117.pdf>. Accessed March 2023.

²⁸ Culver City. 2017. IOF Specific Plan Project Draft Environmental Impact Report. Available at <https://www.culvercity.org/files/assets/public/documents/city-manager/inglewood-oil-field/environmental-review-process/toc091117.pdf>. Accessed March 2023.

²⁹ California Department of Conservation, 2023. Tsunami Hazard Area Map, Los Angeles County; produced by the California Geological Survey and the California Governor's Office of Emergency Services. <https://www.conservation.ca.gov/cgs/tsunami/maps>. Accessed March 2023.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- 100-year Flood Zone

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; FEMA, 2018; ESRI, 2021

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Figure 4.9-3
Flood Zones in the Planning Area



4.9.3 Regulatory Framework

Federal

Clean Water Act

The Clean Water Act (CWA) is the primary federal law that protects the quality of the nation's surface waters, including lakes, rivers, and coastal wetlands. It is based on the principle that all discharges into the nation's waters are unlawful unless specifically authorized by a permit. Permit review is the CWA's primary regulatory tool. A key component of the CWA is Section 402, which regulates point-source and nonpoint-source discharges to surface waters through the National Pollution Discharge Elimination System (NPDES) program. In California, the SWRCB oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits. General permits in California designed for compliance with the NPDES program include the Construction General Permit and Industrial General Permit issued by the SWRCB, as well as MS4 permits issued by the RWQCBs. The Construction General Permit and the MS4 permits discussed below comply with Section 402.

The CWA also requires states to adopt water quality standards for receiving waters. Water quality standards designate beneficial uses for receiving waters (e.g., wildlife habitat, agricultural supply, fishing), and include the criteria required to support those uses. Water quality criteria are either narrative statements related to the quality of the water that support a particular use or maximum concentration levels for pollutants (i.e., lead, suspended sediment, bacteria, etc.). As part of the CWA, when monitoring data indicate that a concentration level for a pollutant has been exceeded, the receiving water is classified as impaired and placed on the CWA Section 303(d) List of Water Quality–Limited Segments Requiring TMDLs (303[d] list). A TMDL is then developed for the pollutant(s) that caused the impairment. A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (plus a "margin of safety"). The purpose of the TMDL is to limit the volume of pollutants discharged into the receiving water from all sources (i.e., Stormwater runoff, wastewater, agriculture).

Executive Order 11988

Executive Order 11988 directs federal agencies to avoid to the extent practicable and feasible short- and long-term adverse impacts associated with the occupancy and modifications of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. Furthermore, this Executive Order requires the prevention of uneconomic, hazardous, or incompatible use of floodplains; protection and preservation of the natural and beneficial floodplain values; and consistency with the standards and criteria of the National Flood Insurance Program (NFIP).

Federal Highway Administration (FHA) regulations require that a local hydraulic study and risk assessment be performed where a planned facility or action would encroach on a base floodplain or support incompatible floodplain development. When the hydraulic study indicates significant encroachment, findings must be made that it is the only practicable alternative. The hydraulic

study and risk assessment protocols are set forth in the Caltrans Highway Design Manual. This manual provides guidance and procedures whenever an encroachment permit is anticipated.

Federal Antidegradation Policy, 40 Code of Federal Regulations 131.12

The Federal Antidegradation Policy was released in 1968 and was included in the USEPA's first Water Quality Standards Regulation. The Antidegradation Policy represents a three-tiered approach to maintaining and protecting water quality. First, all existing beneficial uses and levels of water quality necessary to protect those uses must be preserved and protected from degradation. Second, water quality must be protected in areas where the quality cannot support the propagation of fish, shellfish, and wildlife and recreation ("fishable/swimmable"). Third, the policy provides special protection of waters for which the ordinary water quality criteria are not sufficient. These waters are called "Outstanding National Resources Waters" and have been designated as unique or ecologically sensitive. If an activity is going to be allowed to degrade or lower water quality (in situations where existing water quality is higher than that needed to maintain established beneficial uses), the Antidegradation Policy requires that proposed projects meet the following criteria: (1) The activity is necessary to accommodate important economic or social development in the area; and (2) water quality is adequate to protect and fully maintain existing beneficial uses.

National Flood Insurance Program

The National Flood Insurance Act of 1968 established the National Flood Insurance Program, which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within Special Flood Hazard Areas. FEMA is responsible for determining flood elevations and floodplain boundaries based on studies and surveys conducted by the U.S. Army Corps of Engineers (USACE). FEMA is also responsible for distributing the FIRMs used in the National Flood Insurance Program. These maps identify the locations of special flood hazard areas, including the 100-year floodplain. FEMA allows nonresidential development in the floodplain; however, construction activities are restricted within flood hazard areas, depending on the potential for flooding within each area. Federal regulations governing development in a floodplain are set forth in Title 44, Part 60 of the Code of Federal Regulations, enabling FEMA to require municipalities that participate in the National Flood Insurance Program to adopt certain flood hazard reduction standards for construction and development in 100-year floodplains.

National Pollutant Discharge Elimination System Program

The NPDES program was established per 1972 amendments to the Federal Water Pollution Control Act to control discharges of pollutants from point sources³⁰ (Section 402). The 1987 amendments to the CWA created a section devoted to Stormwater permitting (Section 402[p]), with individual states designated for administration and enforcement of the provisions of the CWA and the NPDES program. The NPDES permit program is administered in the State of California by the SWRCB and RWQCBs under the authority of the USEPA to control water pollution by regulating point sources that discharge pollutants into waters of the United States. If discharges from industrial, municipal, and other facilities go directly to surface waters, those

³⁰ Point sources are discrete water conveyances such as pipes or human-made ditches.

project applicants must obtain NPDES permits. An individual NPDES permit is specifically tailored to a discharge to waters of the United States. A general NPDES permit covers multiple facilities within a specific activity category such as construction activities. A general permit applies with same or similar conditions to all dischargers covered under the general permit. The state Construction General Permit is discussed in the *State* subsection further below.

National Toxics Rule

In 1992, the USEPA promulgated the National Toxics Rule under the CWA to establish numeric criteria for priority toxic pollutants for 14 states to bring all states into compliance with the requirements of Section 303(c)(2)(B) of the CWA. The National Toxics Rule established water quality standards for 42 pollutants not covered under California's statewide water quality regulations at that time. As a result of the court ordered revocation of California's statewide Basin Plans in September 1994, the USEPA initiated efforts to promulgate additional federal water quality standards for California. In May 2000, the USEPA issued the California Toxics Rule, which includes all the priority pollutants for which USEPA has issued numeric criteria not included in the National Toxics Rule. The California Toxics Rule is discussed in greater detail below in the *State* subsection.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), administered by the USEPA in coordination with the states, is the main federal law that ensures the quality of drinking water. Under the SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The Department of Public Health administers the regulations contained in the SDWA in the State of California.

State

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act, also known as the California Water Code, is California's statutory authority for the protection of water quality. The Porter-Cologne Water Quality Act is promulgated in the California Code of Regulations Title 22. Under this act, the state must adopt water quality policies, plans, and objectives that protect the state's waters. The act sets forth the obligations of the SWRCB and RWQCBs pertaining to the adoption of Basin Plans and establishment of water quality objectives. Unlike the federal CWA, which regulates only surface water, the Porter-Cologne Water Quality Act regulates both surface water and groundwater. The Porter-Cologne Water Quality Act divided the state into nine regional basins, each with RWQCB. The Project area is located within the jurisdiction of the LARWQCB. The SWRCB is the primary state agency with responsibility to protect surface water and groundwater quality.

The Porter-Cologne Act authorizes the SWRCB to draft policies regarding water quality in accordance with CWA Section 303. In addition, the Porter-Cologne Act authorizes the SWRCB to issue waste discharge requirements (WDRs) for projects that would discharge to state waters. These requirements regulate discharges of waste to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants.

The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

The Porter-Cologne Act requires the SWRCB or the RWQCBs to adopt water quality control plans (Basin Plans) and policies for the protection of water quality. The Basin Plan must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State Water Policy. The Basin Plan identifies beneficial uses for the water to be protected, establishes water quality objectives for the reasonable protection of the beneficial uses, and establishes an implementation program for achieving the water quality objectives. Basin plans also provide the technical basis for determining WDRs, taking enforcement actions, and evaluating clean water grant proposals. Basin plans are updated and reviewed every 3 years in accordance with Article 3 of Porter-Cologne and CWA Section 303(c).

California Toxics Rule

The California Toxics Rule (40 CFR 131.38) is a USEPA-issued federal regulation that provides water quality criteria for potentially toxic constituents in California surface waters with designated uses related to human health or aquatic life. The rule fills a gap in California water quality standards that was created in 1994 when a state court overturned the state's water quality control plans containing water quality criteria for priority toxic pollutants. These federal criteria are legally applicable in the State of California for inland surface waters, enclosed bays, and estuaries for all purposes and programs under the CWA. The California Toxics Rule establishes two types of aquatic life criteria: (1) Acute criteria represent the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time without harmful effects;³¹ and (2) Chronic criteria equal the highest concentration to which aquatic life can be exposed for an extended period of time (four days) without deleterious effects. Due to the intermittent nature of stormwater runoff, especially in Southern California, the acute criteria are considered to be more applicable to stormwater conditions than chronic criteria.

State Antidegradation Policy

Under the State's Antidegradation Policy as set forth in SWRCB Resolution No. 68-16, whenever the existing quality of waters is better than what is needed to protect present and future beneficial uses, such existing quality must be maintained. This State policy has been adopted as a water quality objective in all the state's Basin Plans. The State policy establishes a two-step process to determine if discharges with the potential to degrade the water quality of surface or groundwater will be allowed. The first step requires that, where a discharge would degrade high-quality water, the discharge may be allowed only if any change in water quality would be consistent with the maximum benefit to the people of the state, not reasonably affect present and anticipated beneficial uses of such water, or result in water quality that is not less than that which is prescribed in State policies (i.e., Basin Plans). The second step (as set forth in SWRCB Resolution No. 68-16) states that any activity resulting in discharge to high-quality waters is required to use the best practicable treatment or control of the discharge necessary in order to avoid the occurrence of pollution or nuisance and to maintain the "highest water quality

³¹ The rule does not specify timeframe for "acute." Standard practice would likely imply that any condition that is permanent or semi-permanent is chronic; all else would be short-term.

consistent with the maximum benefit to the people of the state.” The State policy applies to both surface and groundwater, as well as to both existing and potential beneficial uses of the applicable waters.

National Pollutant Discharge Elimination System Permit Program

As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. In the Project area, the NPDES stormwater permitting program is implemented and enforced by the LARWQCB (Region 4). The following NPDES permits address stormwater and dewatering.

Construction General Permit

The SWRCB adopted the original Construction General Permit for Stormwater Discharges from Construction Activities on September 2, 2009 (Order No. 2009-0009-DWQ, General NPDES Permit No. CAS000002) and recently adopted the updated Construction General Permit on September 8, 2022 (Order No. 2022-0057-DWQ). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges.

For all construction activities disturbing one acre of land or more, California mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of best management practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the Construction General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.³² The purpose of a SWPPP is to identify potential sources and types of pollutants associated with construction activity and list BMPs that would prohibit pollutants from being discharged from the construction site into the public stormwater system. BMPs typically address stabilization of construction areas, minimization of erosion during construction, sediment control, control of pollutants from construction materials, and post-construction stormwater management (e.g., the minimization of impervious surfaces or treatment of stormwater runoff). Routine inspection of all BMPs is required under the provisions of the Construction General Permit. In addition, the SWPPP is required to contain a visual monitoring program, a chemical monitoring program for non-visible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

A site-specific SWPPP could include, but is not limited to the following BMPs:

- Erosion Control BMPs –protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels. Such BMPs may

³² Construction Stormwater Program, State Water Resources Control Board, October 30, 2019, https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html. Accessed July 12, 2022.

include, but would not be limited to, use of geotextiles and mats, earth dikes, drainage swales, and slope drains.

- Sediment Control BMPs –treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMPs would be based on keeping sediments on-site and controlling the site boundaries. These BMPs may include, but would not be limited, to use of silt fences, sediment traps, and sandbag barriers, street sweeping and vacuuming, and storm drain inlet protection.
- Wind Erosion Control BMPs –applying water to prevent or minimize dust nuisance.
- Tracking Control BMPs –preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. Project sites are required to maintain a stabilized construction entrance to prevent off-site tracking of sediment and debris.
- Non-Stormwater Management BMPs – also referred to as “good housekeeping practices,” keeping a clean, orderly construction site.
- Waste Management and Materials Pollution Control BMPs –implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate RWQCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction and must prepare a State SWPPP that incorporates the minimum BMPs required under the permit as well as appropriate project specific BMPs. The SWPPP must be completed and certified by the developer, and BMPs must be implemented prior to the commencement of construction and may require modification during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

Construction: NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering

Dewatering operations are practices that discharge non-stormwater, such as ground water, that must be removed from a work location to proceed with construction into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. A NPDES Permit for dewatering discharges was adopted by the LARWQCB on September 13, 2018 (Order No. R4-2018-0125, General NPDES Permit No. CAG994004). Similar to the Construction General Permit, to be authorized to discharge under this Permit, the developer must submit a NOI to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit.³³ In accordance with the NOI, among other requirements and

³³ LARWQCB, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2018.

actions, the discharger must demonstrate that the discharges will not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters. The discharger must obtain and analyze (using appropriate methods) a representative sample of the groundwater to be treated and discharged under the Order. The analytical method used shall be capable of achieving a detection limit at or below the minimum level. The discharger must also provide a feasibility study on conservation, reuse, and/or alternative disposal methods of the wastewater and provide a flow diagram of the influent to the discharge point.³⁴

Operation: Los Angeles County Municipal Stormwater NPDES Program

The County of Los Angeles, City of Los Angeles, and Culver City are Co-Permittees under the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004, effective September 11, 2021).³⁵ The Los Angeles County MS4 Permit has been determined by the SWRCB to be consistent with the requirements of the CWA and the Porter-Cologne Act for discharges through the public storm drains in Los Angeles County to statutorily-defined waters of the United States (33 United States Code [USC] Section 1342(p); 33 CFR Part 328.11). On September 8, 2016, the LARWQCB amended the Los Angeles County MS4 Permit to incorporate modifications consistent with the revised Ballona Creek Watershed Trash Total Maximum Daily Load (TMDL), among other TMDLs incorporated into the Los Angeles County MS4 Permit and the Basin Plan for the Coastal Waters of Los Angeles and Ventura Counties.

Under the amended Los Angeles County MS4 Permit, the County and both Cities are required to implement development planning guidance and control measures that control and mitigate stormwater quality and runoff volume impacts to receiving waters as a result of new development and redevelopment. The County and both Cities also are required to implement other municipal source detection and elimination programs, as well as maintenance measures.

Under the Los Angeles County MS4 Permit, permittees are required to implement a development planning program to address stormwater pollution. This program requires project applicants for certain types of projects to implement a Low Impact Development (LID) Plan. The purpose of the LID Plan is to reduce the discharge of pollutants in stormwater by outlining BMPs, which must be incorporated into the design of new development and redevelopment. These treatment control BMPs must be sufficiently designed and constructed to treat or retain the greater of an 85th percentile rain event or first 0.75 inch of stormwater runoff from a storm event.

The Los Angeles County MS4 Permit (Part VIII.F.4, Priority Development Project Structural BMP Performance Requirements) includes design requirements for new development and substantial redevelopment. These requirements apply to all projects that create or replace more than 5,000 square feet (sf) of impervious cover. Where redevelopment results in an alteration to more than 50 percent of impervious surfaces of a previously existing development and the existing

³⁴ LARWQCB, Order No. R4-2013-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2013.

³⁵ LARWQCB, Order No. R4-2021-0105, NPDES Permit No. CAS004004, Regional Phase I MS4 NPDES Permit, Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit For Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties. September 11, 2021.

development was not subject to post-construction stormwater quality control requirements (i.e., the existing development already has BMPs that comply with the MS4 Permit requirements), the entire project would be subject to post-construction stormwater quality control measures.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of the Stormwater Management Program (SMP). The objective of the SMP is to reduce pollutants in urban stormwater discharges to the “maximum extent practicable” to attain water quality objectives and protect the beneficial uses of receiving waters in Los Angeles County. Special provisions are provided in the Los Angeles County MS4 Permit to facilitate implementation of the SMP. In addition, the Los Angeles County MS4 Permit requires that permittees implement a LID Plan, as discussed above, that designates BMPs that must be used in specified categories of development projects to infiltrate water, filter, or treat stormwater runoff; control peak flow discharge; and reduce the post-project discharge of pollutants into stormwater conveyance systems.

Similarly, Culver City adopted the Culver City Stormwater Quality Master Plan (SWQMP) in May 2021, to guide proposed actions for compliance with the MS4 permit and the EWMP.³⁶

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed into law the SGMA, which provides a framework to regulate groundwater and strengthen local groundwater management of basins most critical to the state’s water needs. SGMA requires basins to be sustainably managed by local public agencies (e.g., counties, cities, and water agencies) who become GSAs. GSAs must assess conditions in their local water basins and adopt locally-based management plans to achieve long-term groundwater sustainability over the next 20 years. It protects existing surface water and groundwater rights and does not impact current drought response measures. The SGMA became effective January 1, 2015.

High- and medium-priority basins are required to develop GSPs to be submitted to the California DWR SGMA Portal. Adjudicated basins are not required to prepare GSPs but are required to submit annual basin reports to fulfill SGMA requirements. The most recent annual report submitted by the Central Basin and West Coast Basin are for the 2021 reporting year.³⁷ The reports list total annual groundwater and surface water used for the reporting year.

Regional

Enhanced Watershed Management Program for the Ballona Creek Group

The Enhanced Watershed Management Program (EWMP) for the Ballona Creek Group [Los Angeles County, Los Angeles County Flood Control District (LACFCD), Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, and West Hollywood] describes a customized compliance pathway that participating agencies will follow to address the pollutant reduction requirements

³⁶ Culver City Public Works Department. Culver City Stormwater Quality Master Plan. May 2021.

³⁷ California Department of Water Resources. 2023b. Adjudicated Area Annual Reports. <https://sgma.water.ca.gov/adjudbasins/report/publicview>. Accessed March 2023.

of the Los Angeles County MS4 Permit.³⁸ By electing the optional compliance pathway in the MS4 Permit, the Ballona Creek Watershed Management Group (BCWM Group) has leveraged this EWMP to facilitate a robust, comprehensive approach to stormwater planning for the Ballona Creek watershed. The objective of the EWMP Plan is to determine the network of BMPs that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Permit requires the identification of Watershed Control Measures, which are strategies and BMPs that will be implemented through the EWMP, individually or collectively, at watershed-scale to address the Water Quality Priorities in the EWMP. The Water Quality Priorities highlight the pollutants and waterbodies that are potentially not attaining water quality standards.³⁹ The EWMP Implementation Strategy is used as a recipe for compliance for each jurisdiction to address Water Quality Priorities and comply with the provisions of the MS4 Permit. The EWMP Implementation Strategy includes individual recipes for each of the 8 jurisdictions and each watershed/assessment area—Ballona Creek, Centinela Creek, and Sepulveda Channel. Implementation of the EWMP Implementation Strategy will provide a BMP-based compliance pathway for each jurisdiction under the MS4 Permit. The permit specifies that an adaptive management process will be revisited every two years to evaluate the EWMP and update the program. The EWMP Implementation strategy will evolve based on monitoring results by identifying updates to the EWMP Implementation Plan to increase its effectiveness.

Greater Los Angeles County Region Integrated Regional Water Management Plan

The Greater Los Angeles County Region (GLACR) Integrated Regional Water Management Plan (IRWMP) was most recently updated in 2014. The IRWMP is a regional plan designed to improve collaboration in water resources management. The first IRWMP for GLACR IRWMP was published in 2006 following a multi-year effort among water retailers, wastewater agencies, stormwater and flood managers, watershed groups, the business community, tribes, agriculture, and non-profit stakeholders to improve water resources planning in the Los Angeles Basin. It provides a mechanism for: (1) coordinating, refining, and integrating existing planning efforts within a comprehensive, regional context; (2) identifying specific regional and watershed-based priorities for implementation projects; and (3) providing funding support for the plans, programs, projects, and priorities of existing agencies and stakeholders.

Los Angeles County General Plan

The Los Angeles County (County) General Plan governs the Sphere of Influence (SOI) portion of the Planning Area as it is within unincorporated Los Angeles County. The County's General Plan addresses flooding and drainage risks associated with stormwater runoff in the Safety and Conservation and Natural Resources Elements.

³⁸ Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, January 2016.

³⁹ Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, p. ES-1, January 2016.

Los Angeles County Low-Impact Development Ordinance

In December 2012, the Los Angeles County Board of Supervisors updated the County Low Impact Development (LID) Ordinance (Chapter 12.84 of the County Code [LACC]) for compliance with the 2012 LARWQCB MS4 Permit. The updated LID Ordinance requires the integration into project design an array of feasible design features and operational practices for the retention, detention, storage, and filtration of stormwater and urban runoff, prior to discharge off-site. LID generally relies on an integrated system of decentralized, small-scale control measures that can be implemented at a project site, using structural devices, engineered systems, vegetated natural designs, and other techniques to control stormwater and urban runoff on-site and not solely through off-site conveyance or at an off-site collection point.

Los Angeles County Municipal Separate Storm Sewer System Permit

As part of its NPDES program, the LARWQCB adopted a new MS4 Permit in 2021 (Order No. R4-2021-0105). MS4 Permits were issued statewide in two phases. Phase I was initiated in 1990, under which the RWQCBs adopted NPDES MS4 Permits for medium (between 100,000 and 250,000 people) and large (more than 250,000 people) municipalities. As part of Phase II, the SWRCB adopted a General Permit for small MS4s (less than 100,000 people) and non-traditional small MS4s including governmental facilities such as military bases, public campuses, and prison and hospital complexes (WQ Order No. 2003-0005-DWQ).

The LARWQCB's 2021 MS4 Permit named 85 incorporated cities, Los Angeles County, and the Los Angeles County Flood Control District as permittees.⁴⁰ The 2021 MS4 Permit imposes a number of basic programs, called Minimum Control Measures, on all permittees in order to maintain a level of acceptable runoff conditions through the implementation of practices, devices, or designs, generally referred to as BMPs, that mitigate stormwater quality problems. As an example, the development construction program requires the implementation of temporary BMPs during a project's construction phase to protect water resources by preventing erosion, controlling runoff, protecting natural slopes and channels, storing fluids safely, managing spills quickly, and conserving natural areas.

Los Angeles Region Basin – Region 4, Water Quality Control Plan

As required by the California Water Code, the LARWQCB has adopted the "Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties" (LA Basin Plan). Specifically, the LA Basin Plan designates beneficial uses for surface water and groundwater, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's Antidegradation policy, and describes implementation programs to protect all waters in the Los Angeles region. In addition, the LA Basin Plan incorporates (by reference) all applicable state and

⁴⁰ California Water Boards – Los Angeles (R4). 2021. California Regional Water Quality Control Board Los Angeles Region Regional Phase I MS4 NPDES Permit (Order No. R4-2021-0105). [https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/public_docs/2022/1_Order\(ACC-RPSignature\).pdf](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/public_docs/2022/1_Order(ACC-RPSignature).pdf). Accessed March 2023.

regional board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the LA Basin Plan.⁴¹

Local

Culver City Municipal Code

Culver City Municipal Code (CCMC) refers to the previously discussed Los Angeles County MS4 Permit for storm drain planning and design calculations. All drainage improvements in the vicinity of the Project are subject to review and approval by the Los Angeles County Department of Public Works and the Public Works Department of Culver City, as appropriate.

Section 5.05.010, Findings

CCMC Section 5.05.010 identifies Culver City as a permittee under the County of Los Angeles NPDES Permit (Permit Nos. R4-2012-0175 and CAS004001, MS4 Permit, since updated to R4-2021-0105 as previously discussed) and subject to the discharge requirements of this permit. This section also authorizes Culver City to adopt BMP requirements for new development and redevelopment (such as those below) to help Culver City comply with the discharge requirements.

Section 5.05.030, Requirements for Existing Properties; Good Housekeeping Provisions

CCMC Section 5.05.030 requires owners and occupants of property in Culver City to implement non-structural and/or structural BMPs to prevent or reduce the discharge of operational pollutants to the municipal storm drain system to the maximum extent practicable, such as: minimizing washing down of paved areas and runoff from irrigation to the extent practicable; sweeping and collecting debris from paved areas; conducting vehicle maintenance in protected areas that avoid the discharge of associated pollutions to the storm drain system; periodic sweeping of parking lots with more than 25 parking spaces that are subject to stormwater runoff; and application of measures in areas where fuels, chemicals, animal waste, garbage, batteries, or other materials are used, stored or disposed of to avoid adverse impacts on water quality.

Code Section 5.05.035, Requirements for Industrial/Commercial and Construction Activities

CCMC Section 5.05.035 requires construction activities subject to NPDES requirements to implement non-structural and/or structural BMPs to reduce sediment, construction waste, trash, and other pollutants from construction activities be reduced to the maximum extent practicable; cover soil piles between October 1 and April 15 to avoid sedimentation; avoid washing construction vehicles where the runoff can enter the storm drain system; and implement a City-approved SWPPP and Wet Weather Erosion Control Plan for construction activities.

Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects

CCMC Section 5.05.040 requires the implementation of LID strategies and Standard Urban Stormwater Mitigation Plan (SUSMP) outlining pollution prevention control requirements during

⁴¹ California Regional Water Quality Control Board. 2023. Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/. Accessed March 2023.

operation for projects meeting specified size and/or redevelopment criteria to mimic predevelopment hydrology. LID strategies include infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use to retain stormwater runoff on-site for the Stormwater Quality Design Volume (SWQDV) defined as the 85 percentile 24-hour runoff event from the Los Angeles County 85th percentile precipitation isohyetal map. SUSMP stormwater pollution control strategies include but may not be limited to: minimizing impervious surface area; conserving natural areas; providing storm drain system stenciling and signage; conducting periodic street and parking lot sweeping; minimizing runoff during irrigation; avoiding motor vehicle washing where the runoff can enter the storm drain system; and installing grease/oil clarifiers.

Culver City Stormwater Quality Master Plan

Culver City Municipal Code refers to the previously discussed Los Angeles County MS4 Permit for storm drain planning and design calculations. Culver City developed the Culver City Stormwater Quality Master Plan (SWQMP), adopted in May 2021, to guide proposed actions for compliance with the MS4 permit and the Enhanced Watershed Management Program.⁴² The Culver City SWQMP is intended to be used as a custom compliance tool for Culver City to achieve stormwater quality goals, and includes guidance to assist developers in complying with the MS4 permit. LID projects are distributed, smaller-scale BMPs that capture, infiltrate, harvest, and use, or treat runoff on a parcel level. They are designed to receive surface runoff from either the surface directly or diversion from storm drainpipes. Examples generally include rainwater cisterns, rain gardens, permeable pavements, and infiltration BMPs.

4.9.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to hydrology and water quality if the project would:

- Threshold HYD-1:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality.
- Threshold HYD-2:** Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- Threshold HYD-3:** 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.

⁴² Culver City Public Works Department. 2021. Culver City Stormwater Quality Master Plan. <https://www.culvercity.org/files/assets/public/documents/public-works/stormwater/stormwater-quality-master-plan-2021-final.pdf>. Accessed March 2023.

- ii. Substantially increase the create or amount of surface runoff in a manner which would result in flooding on- or off-site.
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems of provide substantial additional sources of polluted runoff.
- iv. Impede or redirect flood flows.

Threshold HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Threshold HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Methodology

Potential impacts on surface and groundwater quality and the potential risk of flooding resulting from anticipated development under the Project were evaluated based on relevant information from FEMA, Los Angeles County, and Culver City. Programmatic impacts are discussed in broad, qualitative terms. If necessary, a project-level CEQA analysis would be conducted for future discretionary development projects.

Projects implemented under the proposed General Plan 2045 and Zoning Code Update would be regulated by the various laws, regulations, and policies summarized in Section 4.9.3, *Regulatory Framework*. Compliance with applicable federal, state, and local laws and regulations is assumed in this analysis and local and state agencies would be expected to continue to enforce applicable requirements to the extent that they do so now. Note that the City requires compliance with many of the regulations as a condition of permit approval.

Project Impact Analysis

Violate Water Quality Standards or Waste Discharge Requirements

Threshold HYD-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality.

Impact Statement HYD-1: The Project would contain goals and policies to protect water quality. Construction and operation of future development that would occur under the Project would be required to comply with all applicable laws, regulations, and standards related to water quality and waste discharge. Therefore, the Project would result in less than significant impacts related to violating water quality standards or waste discharge requirements.

General Plan 2045

Impacts on water quality are closely related to the hydrologic context of the Planning Area and the sources and types of pollutants that can further degrade or impair the area's water resources. The Planning Area is generally a developed, urban environment with limited vacant

parcels, where the sources and types of stormwater pollutants are typical of an urban setting. As development occurs within the Planning Area to implement the land uses shown on Figure 2-6, *Draft General Plan Land Use Map*, the amount of impervious surfaces may increase due to the creation or expansion of roadways, parking lots, new buildings and other infrastructure. Impervious surfaces generate higher runoff volumes than pervious surfaces. In addition, impervious surfaces collect urban pollutants that can be mobilized during a rain fall event. Thus, increasing impervious surfaces may also increase the amount of urban pollution in storm water runoff (e.g., sediment, fertilizers, bacteria, metal, trash, etc.).

Other sources of water quality impacts include direct discharge associated with industrial/commercial activities, automobiles, agriculture, and herbicides. Pollutant sources may be generated by past waste disposal practices and chemicals and fertilizers applied to landscaping. Contaminants may include sediment, PCBs, mercury, fuels and oils, metals, pesticides, nutrients, bacteria, and trash. However, the city is largely developed and although the General Plan 2045 anticipates approximately 12,700 new housing units and 3,696,800 square feet of non-residential development, these would be primarily infill development in locations that are already developed with impervious surfaces. Changes in land uses are also proposed that would increase the intensity of land uses on some parcels; however, that increase in intensity is not anticipated to result in a significant increase in runoff from existing conditions.

The General Plan 2045 could result in significant water quality impacts if future development facilitated under the Project were to violate the water quality standards or waste discharge requirements established in the NPDES Construction General Permit Order No. 2022-0057-DWQ, LARWCB CAG994004 Order No. R4-2018-0125/General NPDES Permit No. CAG994004, and Los Angeles County MS4 Permit No. Order No. R4-2021-0105/ NPDES Permit No. CAS004004. Violation of these permits could occur if the development anticipated in the General Plan 2045 would substantially increase pollutant loading levels in the sanitary sewer system or in groundwater underlying the city, either directly through the introduction of pollutants generated by industrial land uses, or indirectly through stormwater pollution.

Implementation of the General Plan 2045 would include the development of a range of land uses, including residential, commercial, industrial, and open space. While some of the proposed land uses would increase impervious surfaces throughout the Planning Area, other land uses, such as new parks and dedicated open space, would increase pervious surfaces. Regardless of the type of land uses developed under the General Plan 2045, future development would be required to comply with the laws, regulations, and permits that regulate water quality and stormwater discharge, as described in Section 4.9.3. *Regulatory Framework*, including the various water quality and waste discharge permits listed above. The City would require that future development projects demonstrate consistency and compliance, as applicable, with the applicable regulations and General Plan 2045 as part of the conditions of approval.

Implementation of the General Plan 2045 would require construction activities, such as grading, excavation, and trenching, which would generate the potential for increased soil erosion and sedimentation in stormwater runoff. Additionally, general construction activities could contribute pollutants such as construction waste, diesel and oil from equipment, solvents, and lubricants that could enter the City's sewer system and enter downstream receiving waters. However, for future

projects that disturb one acre or more, project applicants would be required to prepare and implement a project-specific SWPPP, which would identify site-specific BMPs to minimize stormwater runoff and reduce off-site pollution. These site-specific BMPs would be employed and monitored to prevent soil erosion and discharge of other construction-related pollution throughout the construction phase. In addition, all construction projects in the Planning Area would be required to demonstrate compliance with the CCMC, which also requires the preparation and implementation of a Wet Weather Erosion Control Plan for construction activities.

Some construction activities, such as excavation and trenching have the potential to encounter shallow water, which would require dewatering of the site. If improperly managed, these dewatering activities could result in discharge of contaminated groundwater. In accordance with the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering Permit No. CAG994004 and the Permit Order No. R4-2018-0125 issued by LARWQCB, any contaminated groundwater would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Also, discharges of dewatered groundwater to a storm drain must be conducted in a manner that complies with the Los Angeles MS4 Permit No. Order No. R4-2021-0105/ NPDES Permit No. CAS004004. All dewatering activities must also comply with the requirements of the CCMC. Therefore, compliance with the regional and local water quality and waste discharge requirements and permits would minimize risks of violating water quality standards or waste discharge requirements during construction of future development under the General Plan 2045.

Once construction is completed, future development would also be required to comply with the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Requirements of these permits and ordinances include incorporating operational BMPs and LID features into project designs to minimize soil erosion and discharge of stormwater pollutants throughout the life of the projects. Operation BMPs could include, but are not limited to, bioswales, rainwater cisterns, rain gardens, permeable pavements, and infiltration BMPs, such as bio-retention basins. Implementation of the requirements and standards required by these permits and ordinances would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring on site, generally improving the quality of stormwater before it enters the city's and/or county's stormwater system.

In addition to regulatory compliance, the General Plan 2045 also includes goals and policies to comply with the regional and City's water quality regulations and standards, improve water quality with green infrastructure and incorporation of BMPs, such as naturalized filtration, swales and retention areas, and green streets, and increase stormwater collection and reuse systems (Goal INF-5, Policies INF-5.3, INF-5.4, INF-6.1, INF-6.2, and INF-6.3). The General Plan 2045 also includes various goals and policies to improve the water quality of Ballona Creek by improving incoming water quality as well as restoration of Ballona Creek (Goal C-6, Policies C-6.1 and C-6-2; Goal INF-6, Policies INF-6.1 to INF-6.4). Specifically, the General Plan 2045 includes the Ballona Creek Revitalization Project, which aims to improve water quality, better connect residents to Ballona Creek, and provide recreational, aesthetic, and ecological benefits. The

General Plan 2045 also includes specific policies and implementation actions to handle the water quality at contaminated sites to improve the overall water quality within the Planning Area (Policies C-6.7, C-6.11, and C-6.12). Finally, the General Plan 2045 includes various stormwater infrastructure improvement efforts, including aligning the Ballona Creek Enhanced Watershed Management Program (BCEWMP) to its own stormwater ordinance, implementing a Culver City's Clean Water measure (Measure CW), the County's Safe Clean Water Program (Measure W), and exploring other funding resources. Overall, the proposed General Plan 2045's goals and policies would promote improved water quality within the Planning Area and continued compliance with federal, state, and local water quality regulations to ensure that water quality is protected to the maximum extent practicable.

For the reasons stated above, the proposed General Plan 2045 would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. Therefore, impacts to water quality would be considered less than significant.

Zoning Code Update

The Zoning Code Update that is a part of the Project would establish new zoning districts and associated development standards to correspond with and implement the proposed General Plan Land Use Designations within the city. Future development under the Zoning Code Update would be required to comply with the CWA and regulations enforced by the LARWQCB. In addition, future projects would comply with requirements related to water quality of the City's Zoning Ordinance, CCMC, and the General Plan 2045. Therefore, future development under the Project would not violate any water quality standards or waste discharge requirement or would otherwise substantially degrade surface or groundwater quality. As such, implementation of the Project would result in a less than significant impact related to water quality.

Applicable Proposed General Plan Goals and Policies

Infrastructure Element

Goal INF-5: Stormwater collection and reuse systems. Stormwater collection and reuse systems are enhanced at the parcel, district, and city scale to improve water quality and reduce runoff.

INF-5.3: Reduce impacts of development and redevelopment on water quality. Require new development and redevelopment projects to, at a minimum, meet federal, State, regional, and local stormwater requirements around site design, stormwater treatment, stormwater infiltration, peak flow reduction, and trash capture. Reduce impacts of development and redevelopment projects on water quality, encouraging private developers to address on-site stormwater management beyond what is required by law by:

- Requiring and incentivizing new development to construct bioswales or similar features to treat runoff before it enters the storm drains or receiving waters.
- Requiring implementing Best Management Practices in parking lots to reduce pollutants in runoff and encourage pervious surfaces in new developments.

Goal INF-6: Water Quality. Water quality at downstream receptors and in Ballona Creek are improved.

INF-6.1: Naturalized filtration. Naturalized filtration. Expand naturalized filtration before discharge into Ballona Creek by connecting green infrastructure, integrating bioswales, and expanding green infrastructure strategies.

INF-6.2: Swales and retention areas in capital projects. Integrate vegetated swales and retention areas into pedestrian and bicycle planning capital improvement projects.

INF-6.3: Green streets. Implement green streets to manage 50 percent of stormwater runoff, encouraging stakeholders (i.e. property owners) to integrate green infrastructure with capital improvements.

INF-6.4: Water quality at contaminated sites. Ensure water quality of stormwater is managed appropriately at contaminated sites to protect natural systems from groundwater infiltration and stormwater runoff. Appropriate measures include:

- Proactive bioremediation measures at contaminated sites.
- Collection of water over existing sumps on contaminated sites.
- Contaminated site mediation activities as community educational opportunities to show-case naturalized regeneration and bioremediation technologies where feasible and at stages in the project deemed safe to do so.

Conservation Element

Goal C-6: Ballona Creek. Ballona Creek is transformed such that it mitigates flooding, restores native ecologies, and becomes a scenic multi-purpose open space and recreational corridor.

C-6.1: Runoff capture and infiltration along Ballona Creek. Ensure City projects and proposed projects along Ballona Creek include features and BMPs to increase urban runoff capture and infiltration, while prioritizing nature-based solutions, like bioswales.

C-6.2: Runoff capture and infiltration along Ballona Creek. Ensure City projects and proposed projects along Ballona Creek include features and BMPs to increase urban runoff capture and infiltration, while prioritizing nature-based solutions, like bioswales.

C-6.7: Design innovation along the Ballona Creek corridor. Encourage design innovation in new development along the Ballona Creek corridor while avoiding significant noise and lighting effects on residential uses adjacent to the Creel. For example, orient improvements towards the creek, landscape open space areas, include public art like murals, decks/overlooks, seating, shade, bicycle facilities, and connections to the Ballona Creek path.

C-6.11: Restore Ballona Creek. Coordinate with public and private organizations to support a cohesive approach for planning, implementing, and funding Ballona Creek restoration related to recreational use and trail systems, improved water quality, and increased landscaped open space, while maintaining the priority for flood control.

C-6.12: Ballona Creek funding strategies. Consider creative funding strategies like environmental impact bonds, mitigation banking, special taxes through assessment districts, private-public partnerships, and impact fees in addition to federal, State, and local measures and grants as mechanisms to implement Ballona Creek improvements.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to water quality.

Groundwater Supplies and Groundwater Recharge

Threshold HYD-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Impact Statement HYD-2: **The Project would not deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the Project would result in less than significant impacts related to groundwater supplies, the groundwater table level, and aquifer volumes.**

General Plan 2045

Implementation of the General Plan 2045 would accommodate a net increase in the population by approximately 21,600 residents and 16,260 jobs, which would increase the demand for water, which in turn could lead to groundwater pumping. As discussed in Section 4.18, *Utilities and Service Systems*, the City's water service is provided by Los Angeles Department of Water and Power (LADWP) and the Golden State Water Company (GSWC). Both providers use a combination of local groundwater and surface water purchased from Metropolitan Water District, which is imported from the Colorado River and the State Water Project in Northern California. While the City is not in control over the sources of its water supply provided by LADWP and the GSCW, the groundwater basins these agencies pump are regulated by the SGMA as well as individual basin plans, as applicable. Since the groundwater supply used by both of these water providers is regulated, there are limits on the amount of groundwater each provider can pump for potable use and for this reason, the potential for overdraft is limited. Additionally, neither of these water providers rely solely on groundwater to service the Planning Area and would be able to utilize other sources of potable water to supplemental a decrease in the amount of available groundwater, if needed. Therefore, implementation of the General Plan 2045 is not anticipated to deplete groundwater supplies.

In regard to groundwater recharge, a substantial increase in impervious surfaces in the Planning Area would limit future groundwater recharge via infiltration of pervious surfaces. Existing land uses in the Planning Area with a majority of pervious surface area include approximately 308.4 acres (9.9 percent) of parks, recreation, cemetery, and open space land uses, approximately 431.8 acres (13.9 percent) of oil field land, and approximately 74.6 acres (2.4 percent) of waterways.⁴³ The remainder of the Planning Area (approximately 2,302 acres or 73.8 percent) is already largely developed with land uses that require more impervious surface area (residential,

⁴³ City of Culver City. 2020. Land Use and Community Design Existing Conditions Report. October 2020.

commercial, institutional, industrial, mixed use, utilities, and transportation). The General Plan 2045 establishes land use designations that would encourage mixed uses and infill development, while maintaining existing parks and open space resources and expanding these resources. Therefore, implementation of the General Plan 2045 would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered.

As discussed above in Section 4.9.2, *Environmental Setting*, groundwater recharge in the Santa Monica Subbasin primarily consists of infiltration from precipitation and surface runoff from the Santa Monica Mountains; groundwater recharge basins in the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers are used to recharge the Central Basin; and groundwater recharge for the West Coast Basin is primarily done through injection wells. Future development under the Project would not preclude any of these groundwater recharge processes established for the three underlying groundwater basins within the Planning Area. Therefore, replenishment of groundwater for any of these three groundwater basins is not solely reliant on natural recharge or percolation within the Planning Area.

Furthermore, the California Building Code (CBC) regulates any development that requires grading to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. Therefore, any future development under the General Plan 2045 subject to the CBC would be required to account for its potential groundwater use and implement appropriate water conservation measures (or other mitigating actions) if the potential demand is projected to exceed the available supply.

For these reasons, the Project would not result in the depletion of groundwater supplies or interfere with groundwater recharge and impacts would be less than significant.

Zoning Code Update

Future development under the Zoning Code Update would be required to comply with the requirements related to groundwater of the CCMC, the City's SUSMP and the General Plan 2045. Therefore, future development under the Project would not deplete or interfere with groundwater supplies or recharge. As such, implementation of the Project would result in a less than significant impact related to groundwater.

Applicable Proposed General Plan Goals and Policies

There are no applicable proposed goals or policies relevant to this threshold.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to groundwater.

Substantially Alter Drainage Patterns

Threshold HYD-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. result in substantial erosion or siltation on- or off-site.
 - ii. substantially increase the create or amount of surface runoff in a manner which would result in flooding on- or off-site.
 - iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems of provide substantial additional sources of polluted runoff.
 - iv. impede or redirect flood flows.
-

Impact Statement HYD-3: **The Project would not substantially alter the existing drainage pattern of the Planning Area in a manner that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows. Therefore, impacts related to drainage patterns would be less than significant.**

General Plan 2045

Ballona Creek is a major drainage that flows through the Planning Area. Implementation of the General Plan 2045 would not directly alter the course of Ballona Creek, or any other streams or rivers. The General Plan 2045 includes goals and policies that would support the goals of the Ballona Creek Revitalization Project, which aims to improve water quality, better connect residents to Ballona Creek, and provide recreational, aesthetic, and ecological benefits.

The Ballona Creek Revitalization Project builds on decades of prior initiatives and includes the Ballona Creek Greenway Plan and the Greening the Greenway Project, which received funding in 2021. Specific improvements under the Greening the Greenway Project would be required to undergo a separate project-level environmental review process to be approved by the City Council, where the project would need to demonstrate compliance with all applicable hydromodification and drainage regulations and standards. In addition, the Ballona Creek Revitalization Project would be designed in accordance with the CCMC, including all engineering and hydromodification requirements, and may be required to prepare a drainage technical report to address any alterations to the existing drainage patterns. Finally, any environmental impacts associated with the Ballona Creek Revitalization Project, including altering drainage patterns, would be assessed and mitigated, as necessary, during the separate project-specific environmental review process prior to obtaining City approval. Therefore, implementation of the General Plan 2045 would not directly or indirectly alter the course of a stream or river.

In addition, implementation of the General Plan 2045 could impact the existing drainage systems within the Planning Area due to increases in impervious surfaces, which in turn could increase runoff from properties into the local sewer system. This increase in runoff volumes could in turn result in hydromodification effects—such as erosion, siltation, and flooding—on the hydrological systems within the Planning Area, which occur when rainfall runoff is increased from impervious areas above the natural rainfall rate that would otherwise occur. However, as discussed above, the majority of the city is currently developed and the land use patterns proposed by the General Plan 2045 would concentrate new housing primarily as infill development and would increase development intensity within currently developed areas. Furthermore, future development would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City’s sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City’s SUSMP and SWQMP. Adherence to the regional and City’s permits, regulations, and ordinances would limit surface runoff from development under the General Plan 2045, reducing siltation and erosion.

In addition, the Conservation Element includes policies such as maintaining and improving Ballona Creek’s capacity for flood control and ensuring City projects and other proposed projects along Ballona Creek include features and BMPs to increase capture of urban runoff and increase infiltration, which aim to reduce stormwater runoff and hydromodification effects, including erosion, siltation, and flooding related to Ballona Creek (Policies C-6.1 and C-6.2). The Safety Element also includes policies such as storm drain system evaluation and culvert and storm drain system maintenance to improve the City’s stormwater drainage system (Goal S-6, Policies S-6.6 and S-6.9). For these reasons, the impact of the General Plan 2045 with respect to the alteration of drainage patterns would be less than significant.

Zoning Code Update

The Zoning Code Update would provide specific landscape design standards, which would limit surface runoff for the various land use types identified in the General Plan 2045. Future development under the Zoning Code Update would be required to comply with the requirements related to stormwater runoff of CCMC and the City’s SUSMP. Therefore, future development under the Project would not substantially alter drainage patterns. As such, implementation of the Project would result in a less than significant impact related to this topic.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-6: Ballona Creek. Ballona Creek is transformed such that it mitigates flooding, restores native ecologies, and becomes a scenic multi-purpose open space and recreational corridor.

C-6.1: Flood control coordination. Coordinate with other jurisdictions to forward plans and programs that help achieve regional goals for flood control and improve water quality.

C-6.2: Runoff capture and infiltration along Ballona Creek. Ensure City projects and proposed projects along Ballona Creek include features and BMPs to increase urban runoff capture and infiltration, while prioritizing nature-based solutions, like bioswales.

C-6.3: Climate change and Ballona Creek. Account for climate change and apply current accepted models in planning for and assessing flood risk along the Ballona Creek corridor.

Safety Element

Goal S-6: Flood hazards. The community is resilient to flood and inundation hazards.

S-6.6: Storm drain system evaluation. Continue to evaluate the effectiveness of City-owned storm drain systems and improve them as-needed.

S-6.9: Culvert and storm drain system maintenance. Maintain the culverts and storm drain system to prevent debris or other obstructions from accumulating, as that would hamper the effectiveness of the system during rainy days.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to substantially altering existing drainage patterns.

Release of Pollutant From Inundation by Flood, Tsunami, or Seiche

Threshold HYD-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would risk release of pollutants due to inundation, if within a flood hazard, tsunami, or seiche zone.

Impact Statement HYD-4: The risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area; therefore, impacts related to the risk of release of pollutants due to inundation from a flood, tsunami, or seiche would be less than significant.

General Plan 2045

As described above in Section 4.9.2, *Environmental Setting*, the Planning Area is located approximately 1.5 miles inland from nearby coastal areas, which is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the Planning Area with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, as shown on Figure 4.9-3, the majority of the Planning Area is located outside of a flood hazard zone. For these reasons, the risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area.

Additionally, future development facilitated under the Project would be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which would reduce the risk of onsite flooding and release of pollutants. Moreover, future development would also have to comply and demonstrate consistency with the Safety Element goals such as Goal S-6 (Flood Hazards) and policies such as monitoring City-owned drainage infrastructure and maintaining culverts and storm drain systems that address risks and hazards

associated with flooding and discharge. Therefore, impacts associated with release of pollutants from inundation by flood, tsunami, or seiche would be less than significant.

Zoning Code Update

As described above, the risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area and impacts would be less than significant. In addition, future development under the General Plan 2045 and the Zoning Code Update would be required to comply with the FEMA regulations for areas of the Planning Area within identified flood hazard zones. Therefore, the Zoning Code Update would not result impacts related to release of pollutants due to inundation, if within a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-6: Flood hazards. The community is resilient to flood and inundation hazards.

S-6.7: City-owners drainage systems. Monitor City-owned drainage infrastructure during rain events and take emergency action, as necessary, to avoid or minimize flooding.

S-6.9: Culvert and storm drain system maintenance. Maintain the culverts and storm drain system to prevent debris or other obstructions from accumulating, as that would hamper the effectiveness of the system during rainy days.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to release of pollutants from inundation by flood, tsunami, or seiche.

Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan

Threshold HYD-5: The Project would have a potentially significant impact if implementation of the General Plan 2045 and Zoning Code Update would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Statement HYD-5: The Project would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

General Plan 2045

As described under Threshold HYD-1 above, implementation of the General Plan 2045 would not degrade water quality due to compliance with all applicable federal, state, regional and local water quality laws, regulations, and permits. Moreover, the General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the Planning Area, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the

maximum extent practicable. As discussed in Section 4.9.3, *Regulatory Framework*, GSPs are not required for the West Coast Basin and Central Basin since these are considered adjudicated. While there are no GSPs for these adjudicated subbasins, Groundwater Sustainability Agencies (GSAs) are still required to submit annual basin reports to fulfill SGMA requirements.

However, the Santa Monica Subbasin, is not an adjudicated basin and a GSP was adopted by the SMBGSA in January 2022.⁴⁴ Implementation of the General Plan 2045 would not interfere with or conflict with the GSP since the City is a member of SMBGSA and the Project includes various implementation actions that support the GSP, including incentivizing and mandating stormwater infiltration where feasible and participating in regional coordination regarding aquifer recharge and sustainable ground water supply. Furthermore, as described under Threshold HYD-2 above, due to the developed nature of the city and the proposed land use distribution, impacts to groundwater supplies as a result of new impervious surfaces would be less than significant. Thus, the General Plan 2045 would not conflict with the Santa Monica Subbasin GSP and impacts would be less than significant.

Zoning Code Update

Future development under the Zoning Code Update would also be required to comply with the CWA and regulations enforced by the LARWQCB. In addition, future development projects would comply with development requirements such as landscape standards provided in the Zoning Code Update, CCMC, and the General Plan 2045. Therefore, future development under the Project would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design

LU-17.4: Stormwater management throughout the Ballona Creek watershed. Continue to implement stormwater management practices across the Ballona Creek watershed to capture, treat, and store greywater to irrigate nearby landscapes, to improve water quality, and to increase trash capture.

Conservation Element

C-6.1: Flood control coordination. Coordinate with other jurisdictions to forward plans and programs that help achieve regional goals for flood control and improve water quality.

C-6.11: Restore Ballona Creek. Coordinate with public and private organizations to support a cohesive approach for planning, implementing, and funding Ballona Creek restoration related to recreational use and trail systems, improved water quality, and increased landscaped open space, while maintaining the priority for flood control.

⁴⁴ California Department of Water Resources. 2023c. SGMA Portal. SGMA Groundwater Management (SGMA) Portal - Department of Water Resources (ca.gov) Accessed April 2023.

Infrastructure Element

Goal INF-5: Stormwater collection and reuse systems. Stormwater collection and reuse systems are enhanced at the parcel, district, and city scale to improve water quality and reduce runoff.

Goal INF-6: Water Quality. Water quality at downstream receptors and in Ballona Creek are improved.

INF-6.2: Swales and retention areas in capital projects. Integrate vegetated swales and retention areas into pedestrian and bicycle planning capital improvement projects.

INF-6.3: Green streets. Implement green streets to manage 50 percent of stormwater runoff, encouraging stakeholders (i.e. property owners) to integrate green infrastructure with capital improvements.

INF-6.4: Water quality at contaminated sites. Ensure water quality of stormwater is managed appropriately at contaminated sites to protect natural systems from groundwater infiltration and stormwater runoff. Appropriate measures include:

- Proactive bioremediation measures at contaminated sites.
- Collection of water over existing sumps on contaminated sites.
- Contaminated site mediation activities as community educational opportunities to show-case naturalized regeneration and bioremediation technologies where feasible and at stages in the project deemed safe to do so.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to conflicting with a water quality control plan or sustainable groundwater management plan.

4.9.5 Cumulative Impacts Analysis

Water Quality

The geographic context for the analysis of cumulative impacts associated with water quality is the area covered by the Ballona Creek and Marina Del Rey Watersheds. Cumulative development in these watersheds may contribute to an incremental increase in impervious surfaces that could introduce pollutants that are typically associated with urban runoff into the stormwater and impact water quality. Cumulative development could also contribute to water quality impacts in the watershed from construction activities. All future development in these watersheds, including development anticipated under the General Plan 2045 and Zoning Code Update, would be subject to the requirements of the NPDES program and other federal, State, and regional regulations such as pollution control ordinances. Adherence to these regulations would minimize degradation of water quality associated with the construction and operation of individual projects. As such, the cumulative impact with respect to water quality would be

considered less than significant. Therefore, the Project would result in less than significant cumulative impacts related to water quality.

Groundwater

The geographic context for the analysis of cumulative impacts associated with groundwater is the area underlain by the Santa Monica Subbasin, West Coast Basin, and Central Basin. All basins are regulated, and thus have limits on the amount of groundwater that is pumped for potable use. Therefore, the potential for overdraft is limited. With respect to groundwater recharge, the areas overlaying these basins are heavily urbanized and primarily built out with impervious surfaces. Therefore, future development over these groundwater basins, including growth anticipated under the General Plan 2045 and the Zoning Code Update, would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. In addition, groundwater recharge in the Santa Monica Subbasin primarily consists of infiltration from precipitation and surface runoff from the Santa Monica Mountains; groundwater recharge basins in the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers are used to recharge the Central Basin; and groundwater recharge for the West Coast Basin is primarily done through injection wells. Thus, replenishment of groundwater is not reliant solely on natural recharge or percolation within the area. For these reasons, the cumulative impact with respect to depletion of groundwater supplies and groundwater recharge would be considered less than significant. Therefore, the Project would result in less than significant cumulative impacts related to groundwater.

Storm Drainage

The existing storm drain system in the city is currently owned and operated by the City, while the Los Angeles County Department of Public Works (LACPWD) is responsible for all regional drainage facilities within the County. Since local storm drain facilities within the city ultimately flow into the County facilities, the geographic context for cumulative impacts is western Los Angeles County. As the Planning Area and much of the County is heavily urbanized, future development would not involve the direct alteration of existing streams, rivers, or other drainage patterns. However, potential future development in western Los Angeles County, including growth anticipated under the General Plan 2045 and the Zoning Code Update, could impact the existing drainage system. All future development would be subject to floodplain management and stormwater and urban runoff pollution control ordinances for each jurisdiction that would prevent flood damage resulting from hydromodification. Adherence to these ordinances would also limit surface runoff from future development, thus reducing siltation and erosion. For these reasons, the cumulative impact with respect to storm drainage would be considered less than significant. Therefore, the Project would result in less than significant cumulative impacts related to storm drainage and hydromodification effects.

Flood Hazards

The geographic context for the analysis of cumulative impacts associated with flooding hazards is the area served by Ballona Creek. Cumulative growth and development throughout the area has resulted in the introduction of new structures and impervious surfaces that increased stormwater runoff, leading to increased flood hazards associated with the water levels in

Ballona Creek. Future development in the area, including growth anticipated under the General Plan 2045 and the Zoning Code Update, would be subject to floodplain management and stormwater and urban runoff pollution control ordinances for each jurisdiction that would prevent flooding. For these reasons, the cumulative impact with respect to flooding would be considered less than significant. Therefore, the Project would result in less than significant cumulative impacts related to flood hazards.

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4.10 Land Use and Planning

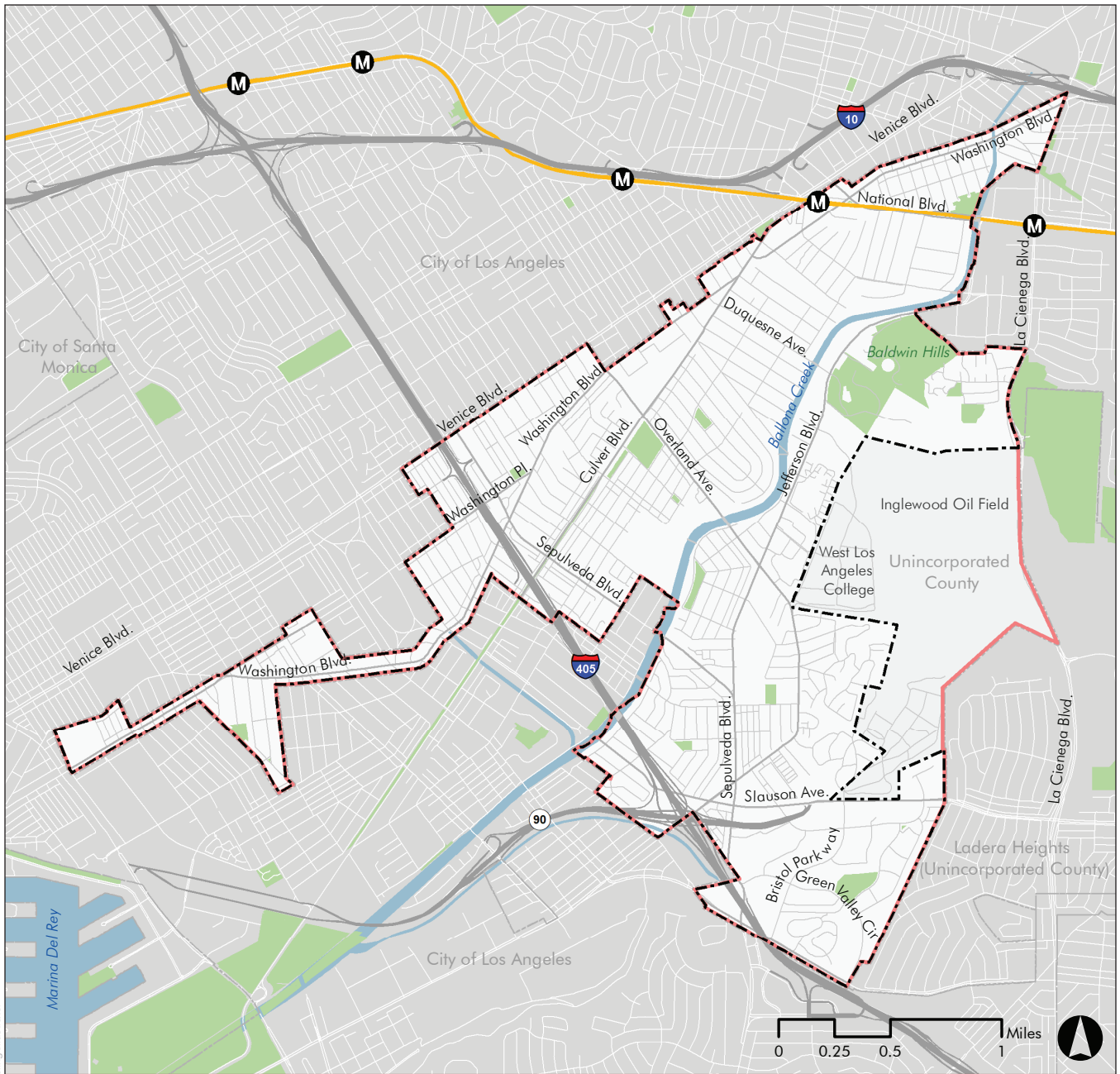
4.10.1 Introduction




This section provides an analysis of the potential local and regional environmental impacts on land use and planning from implementation of the Project, including potential impacts related to physically dividing a community and consistency with applicable land use plans. The section provides context regarding the Planning Area's existing land use pattern, as well as relevant federal, State, and local regulations and programs.

4.10.2 Environmental Setting

Culver City is located in the western part of Los Angeles County in Southern California. The city is surrounded on three sides (north, east, and west) by the City of Los Angeles and to the southeast by an unincorporated area of Los Angeles County, known as Ladera Heights. The city is located approximately 5 miles east of the Pacific Ocean, 5 miles north of Los Angeles International (LAX) Airport, and 8 miles west of downtown Los Angeles. Ballona Creek runs through the city in a south-westerly direction from its origin near Cochrane Avenue and Venice Boulevard in the city of Los Angeles ending at the Pacific Ocean. Regional access to the city is provided via Interstate 405 (I-405), which runs in a north-south direction in the western part of the city, and Interstate 10 (I-10), which runs in an east-west direction just outside the northern boundary of the city. Local access is provided via State Route 90 (SR-90), which intersects the city from the west and ends at Slauson Avenue in the Fox Hills neighborhood. The Metro Expo (E) lines connect the city west to Santa Monica and east to Downtown Los Angeles from the Culver City Station on National Boulevard.

The Planning Area includes the area within the City of Culver City's jurisdictional boundaries and its Sphere of Influence (SOI), as shown in **Figure 4.10-1, Planning Area**. The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city. The SOI is located to the east of the city boundary in the Baldwin Hills area of Los Angeles County, west of La Cienega Boulevard. The Planning Area covers approximately 3,910 acres, of which about 3,280 acres (84 percent) are located within city limits, and approximately 630 acres (16 percent) are located in its SOI. The city is generally divided into 15 neighborhoods as shown on **Figure 4.10-2, Planning Area Neighborhoods**.



-  City Limits
-  Sphere of Influence
-  Metro Station
-  E Line (Expo)
-  Major Roads
-  Local Roads
-  Parks and Open Space
-  Waterbody

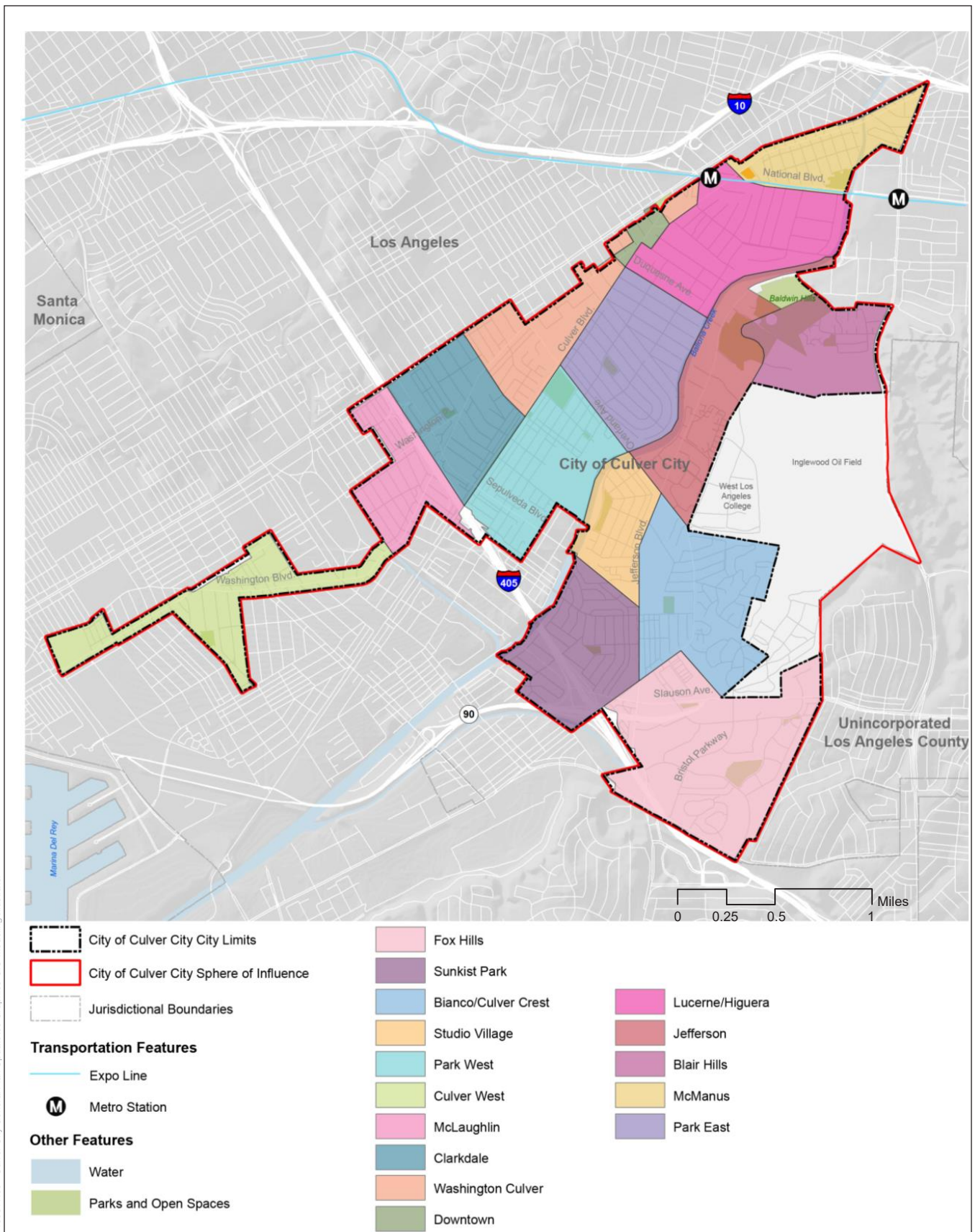
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SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 4.10-1
Planning Area





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SOURCE: City of Culver City, 2019; County of Los Angeles, 2019

Culver City General Plan 2045

Figure 4.10-2
Planning Area Neighborhoods



Existing Land Use and Overall Pattern

As identified in **Table 4.10-1, Existing Land Uses in the Planning Area (2020)**, the most prevalent land use in Culver City is single-family residential (covering 35.8 percent of land area),¹ followed by retail and services (13.5 percent of land area), and civic and institutional, which includes government buildings, schools, healthcare facilities and churches (9.5 percent of land area). Uses within the SOI include oil field (59.8 percent of land area), parks, recreation, cemeteries, and open space (25.5 percent of land area), and civic and institutional (14.7 percent of land area). In the Planning Area as a whole, the most prevalent land uses are single-family residential (28.8 percent), oil field (13.9 percent), retail and services (10.9 percent), and civic and institutional (10.5 percent). There are approximately 15.6 acres of vacant land in the Planning Area (0.5 percent), all of which are located within the city. Existing land uses within the Planning Area are mapped in **Figure 4.10-3, Existing General Plan Land Use Map**, and discussed throughout this section.

**TABLE 4.10-1
 EXISTING LAND USES IN PLANNING AREA (2020)**

Existing Land Use Category	City of Culver City		Sphere of Influence (SOI)		Total Planning Area	
	Acres	Percent	Acres	Percent	Acres	Percent
Residential	1,233.8	49.2	0.0	0.0	1,233.8	39.6
Single-Family	898.4	35.8	0.0	0.0	898.4	28.8
Duplex, Triplex, Fourplex	185.5	7.4	0.0	0.0	185.5	6.0
Multi-Family (5+ units)	144.6	5.8	0.0	0.0	144.6	4.6
Mobile Homes	5.3	0.2	0.0	0.0	5.3	0.2
Commercial	594.0	23.7	0.0	0.0	594.0	19.1
Retail and Services	339.2	13.5	0.0	0.0	339.2	10.9
Office	186.5	7.4	0.0	0.0	186.5	6.0
Studios	68.3	2.7	0.0	0.0	68.3	2.2
Oil Field	68.0	2.7	363.9	59.8	431.8	13.9
Civic and Institutional	239.2	9.5	89.5	14.7	328.7	10.5
Parks, Recreation, Cemeteries, Open Space	153.6	6.1	154.8	25.5	308.4	9.9
Cemetery	0.1	0.0	154.8	25.5	154.9	5.0
Parks, Recreation, Open Space ³	153.5	6.1	0.0	0.0	153.5	4.9
Industrial	120.2	4.8	0.0	0.0	120.2	3.9
Waterway	74.6	3.0	0.0	0.0	20.6	0.7
Vacant, Utilities, Transportation	20.6	0.8	0.0	0.0	20.6	0.7
Vacant	15.6	0.6	0.0	0.0	15.6	0.5
Utilities, Transportation	5.0	0.2	0.0	0.0	5.0	0.2
Mixed Use	4.7	0.2	0.0	0.0	4.7	0.2
Total	2,508.6	100.0	608.2	100.0	3,116.8	100.0

NOTES:

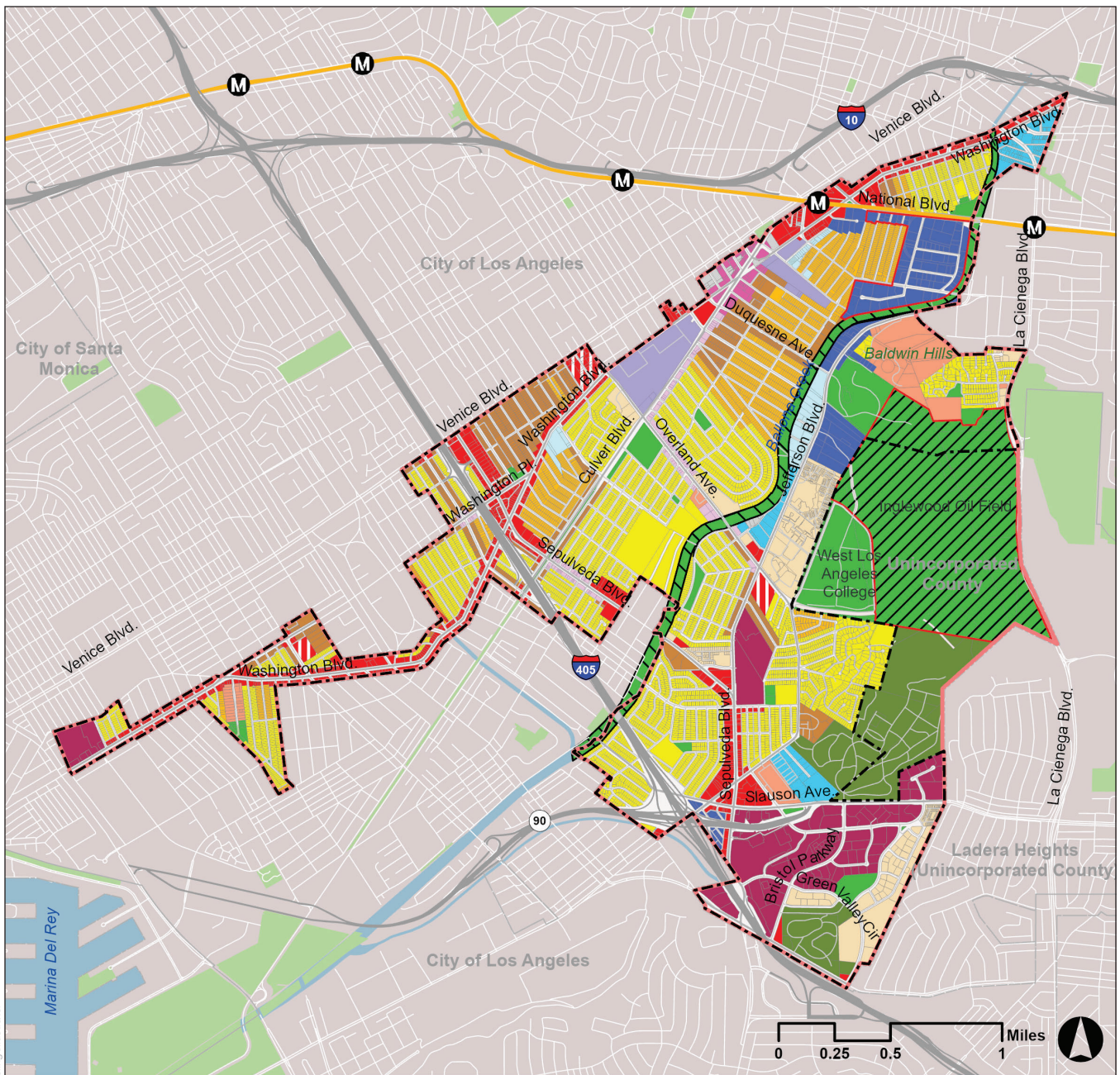
¹ Acreage total does not include roadway rights-of-way.

² Totals may not add due to rounding.

³ Includes acreage of open spaces that are not public parks, such as greenways.

SOURCE: City of Culver City. 2020a. Land Use and Community Design Existing Conditions Report.

¹ While single-family residential land use is the most prevalent in the city, there are slightly more multi-family housing units (54 percent) than single-family units (46 percent).



- | | | |
|----------------------|---------------------------------|------------------------------------|
| City Limits | Residential Uses | Industrial Uses |
| Sphere of Influence | Low Density Single Family | Light Industrial |
| Metro Station | Low Density Two Family | Industrial Park |
| E Line (Expo) | Low Density Three Family | Other Uses |
| Major Roads | Low Density Multiple Family | Studio |
| Local Roads | Medium Density Multiple Family | Cemetery |
| Parks and Open Space | Planned Residential Development | Open Space |
| Waterbody | Commercial Uses | Institutional |
| | Neighborhood Serving Corridor | Focused Special Study Areas |
| | General Corridor | Ballona Creek |
| | Downtown | Hayden Industrial Tract |
| | Community Serving Center | Blair Hills/Baldwin Hills |
| | Regional Center | |

SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 4.10-3
Existing General Plan Land Use Map



Residential

As shown in Table 4.10-1, residential uses are the most prevalent land use in the Planning Area. Residential uses occupy approximately 1,234 acres, or 39.6 percent, of the Planning Area. Residential uses, which are all located within the city, consist of single-family; duplex, triplex, and fourplex units; multifamily (5+ units), and mobile home uses. Within the city, single-family uses account for 28.8 percent, duplex/triplex/fourplex uses account for 6 percent, multifamily (5+ units) uses account for 4.6 percent, and mobile home uses account for 0.2 percent.

Single-family residential uses are mostly situated on gridded neighborhood streets within the City. Some neighborhoods, including Park West and Sunkist Park, are almost entirely comprised of single-family homes. Other neighborhoods, including Park East, Studio Village, Clarkdale, and Washington Culver, have a more even mix of single-family and multi-family housing. Multi-family housing in these neighborhoods is generally low density (fewer than approximately 20 dwelling units per acre). The most common multi-family housing types in these neighborhoods are townhomes, duplexes, triplexes, and fourplexes or "dingbats" (two- to three-story stucco apartment buildings with tuck-under parking). Many single-family residences, particularly in the Park East and West neighborhoods, have either stand-alone or above-garage accessory dwelling units (ADUs). ADUs are small housing units built on a property that has a primary residential use.

Housing is also located on regional arterials, including Washington, Venice, and Sepulveda Boulevards. Most of this housing stock is in the form of mixed-use apartment or condominium buildings that are between two and five stories high. Some of these mixed-use buildings have ground-floor commercial uses. The Fox Hills neighborhood has a significant amount of multi-family residential development, particularly along Green Valley Circle, Buckingham Parkway, and Canterbury Drive. Apartments and condominiums in this area are mostly garden or courtyard-style buildings and are usually at least three stories.

Commercial

Commercial development occupies 19.1 percent of the Planning Area and is comprised of retail, services, office, and studio uses. Similar to residential uses, all commercial uses are located within the city. Most retail, restaurant, and personal service land uses are located along arterials, including Washington, Jefferson, and Culver Boulevards, and comprise approximately 10.9 percent of the Planning Area. Restaurants, bars, and small-scale retail are concentrated Downtown. Jefferson Boulevard, between Slauson and Overland Avenues, is lined mostly with strip malls and big-box stores set far back from the street. There are two car dealerships located on Washington Boulevard near the intersection with Culver Boulevard. Regional destinations, including the Westfield Culver City shopping mall and hotels, are located near I-405 in the Fox Hills area. Culver City's Costco is another regional draw and is located on Washington Boulevard in the western-most extent of the Planning Area.

Office uses (6 percent of the Planning Area), and studio uses (2.2 percent of the Planning Area) are spread throughout the Planning Area. The biggest concentration of office is in the Fox Hills business park. The most prominent studio use is Sony Pictures Studios, and Amazon Studios will be another prominent studio use once the Culver Studios project has been completed.

Apple, Amazon Studios, and HBO will have offices for their production headquarters in Culver City once construction, currently underway at their respective locations Apple and HBO's headquarters will be in the transit-oriented development (TOD) District and Amazon Studios in Downtown. TikTok offices are also located in Culver Pointe in the Fox Hills neighborhood.

Industrial and Oil Field

Industrial uses cover approximately 4 percent of the Planning Area and include warehouses, and manufacturing in buildings with large footprints. Creative companies, including those in film production, architecture, the arts, and fashion, use many warehouse-like industrial buildings. Small industrial uses are located in a strip along Jefferson Boulevard between Overland Avenue and Hetzler Road. Many of the developments on these parcels face away from Ballona Creek. The McManus area has a concentration of industrial uses near the intersection of Washington and La Cienega Boulevards. The most notable industrial district is the Hayden Tract, though the district has been experiencing a conversion to more office/creative office uses in recent years. The Hayden Tract is home to various creative companies and is known for its contemporary industrial and office buildings designed by architect Eric Owen Moss.

The Inglewood Oil Field (IOF) comprises approximately 13.9 percent of the Planning Area. Of the 432 acres of land operated as an oil field in the Planning Area, about 68 acres or approximately 2.7 percent are within Culver City limits.

Civic/Institutional

Civic and institutional uses are distributed evenly throughout the Planning Area. They include places of worship, public and private schools, libraries, City Hall, police and fire stations, and other public uses. West Los Angeles College is located in the SOI in an unincorporated area of the county. Civic and institutional uses comprise approximately 10.5 percent of the Planning Area.

Parks, Recreation, Cemeteries, and Open Space

Parks, recreational facilities, cemeteries, and open spaces occupy approximately 10 percent of the Planning Area. Parks, recreational facilities, cemeteries, and open spaces occupy approximately 6 percent of land in the city and cemetery use is also located within the SOI. Cemeteries comprise approximately 5 percent and parks, recreational facilities, and open spaces comprise approximately 5 percent. Parks are distributed throughout the city and are more commonly located in residential neighborhoods with convenient access for Culver City residents. The biggest park facility in the city is Baldwin Hills, which is owned and managed by the State of California through the Baldwin Hills Conservancy.

Vacant

Vacant land is distributed throughout the Planning Area. The largest cluster of vacant parcels is near the intersection of Jefferson Boulevard and College Boulevard, just south of Culver City Park. Overall, vacant land occupies approximately 0.6 percent of land within the city and 0.5 percent of the Planning Area.

Development Projects

At the time of the preparation of the existing conditions reports, there were approximately 1,550 housing units, 480 hotel rooms, approximately 190,000 square feet of retail, and approximately 1.5 million square feet of office in the city development pipeline.² Many low density (fewer than approximately 12 units) residential projects are infill developments in existing residential neighborhoods. Higher density residential developments are being developed along major roadways, Downtown, and in the TOD District near the Metro station. Examples of higher density multi-family projects include Ivy Station (200 units), Jefferson Park (259 units), a senior housing development on Washington Boulevard (116 units), and 12717 Washington Boulevard (116 units). These projects are in the Lucerne Higuera, Studio Village, Clarkdale, and Culver West neighborhoods, respectively.

The most significant commercial developments are the Entrada office tower, Culver Crossroads, Culver Studios, and Ivy Station. Entrada, a 280,000 square foot office tower, is the most significant non-residential project in the Fox Hills area. Culver Studios will house Amazon Studios and consist of six new buildings containing studios and offices in the Downtown. Ivy Station will consist of retail, restaurants, apartments, a hotel, and offices, including offices for HBO.

4.10.3 Regulatory Framework

This section provides the relevant State, regional, and local regulations applicable to the Project. There are no federal regulations which apply to the Project.

State

California Government Code Section 65300

Government Code Sections 65300 states that each planning agency shall prepare, and the legislative body of each county and city shall adopt, a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries in which the planning agency's judgment bears relation to its planning.

California Government Code Sections 65919 to 65919.11

Government Code Sections 65919 to 65919.11 summarize procedures related to interagency referrals for different types of lead agency actions, including general plan updates. Among other referrals, this part of the Government Code provides a procedure and protocols for requesting counties to keep cities informed regarding land use actions within the unincorporated portions of spheres of influences and planning areas.

Sustainable Communities and Climate Protection Act of 2008 (Chapter 728, Statutes of 2008)

The Sustainable Communities and Climate Protection Act of 2008, otherwise known as Senate Bill (SB) 375, requires the integration of land use, housing, and transportation planning to

² City of Culver City. 2020a. Culver City Land Use and Community Design Existing Conditions Report. https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f936f995f4c6062f85b1d27/1603498031880/LUECR_Web.pdf. Accessed October 2023.

achieve regional greenhouse gas (GHG) emission reductions, adopted by the California Air Resources Board (CARB). SB 375 requires Metropolitan Planning Organizations (MPOs) to develop a Sustainable Communities Strategy (SCS)—an element of the regional transportation plan (RTP)—to plan for achieving these GHG reduction targets. The SCS must demonstrate the attainment of the regional GHG emissions reduction targets while accommodating the full projected population of the region.

Regional

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, referred to as Connect SoCal) was adopted in September 2020 by the Southern California Association of Governments' (SCAG) Regional Council.³ Connect SoCal is a long-range plan that guides land use and transportation strategies to increase mobility and achieve more sustainable growth patterns by locating housing, jobs, and transit closer together and increasing investment in transit and complete streets. These investments are targeted in Priority Growth Areas.

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods, or cycles. In prior cycles, factors such as household growth and household income distribution were the primary factors considered in determining a jurisdiction's RHNA allocation. SCAG's 6th Cycle RHNA quantifies the regional need for housing and then allocates the regional need to each jurisdiction for a planning period between October 2021 and October 2029. The 6th Cycle RHNA is focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine the 2020 RTP/SCS's projected growth. Therefore, the 6th Cycle RHNA allocation for the City results in a higher allocation of housing than what is represented in the 2020 RTP/SCS, which is focused solely on projected or future growth. For the 6th RHNA Cycle, SCAG considers other factors in addition to household growth. These factors include transit accessibility, job accessibility, and indicators that influence a community's environmental, educational, and economic resource accessibility.

The final 6th Cycle RHNA methodology and allocations were adopted by the Regional Council on March 4, 2021, approved by HCD on March 22, 2021 and modified on July 1, 2021. As part of the RHNA draft allocations, the City's allocation of housing between October 2021 and October 2029 is 3,341 units.

³ SCAG is currently in the process of updating the RTP/SCS. Since the 2024-2050 RTP/SCS is not yet adopted, the analysis in this section compares the Project to the current RTP/SCS.

Consistent with the state housing law, the primary objectives the 6th Cycle RHNA allocation plan are to:

- Increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner;
- Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns;
- Promote an improved interregional relationship between jobs and housing;
- Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution;
- Affirmatively furthering fair housing.

Local jurisdictions are required to plan and zone to accommodate their respective RHNA allocation (housing units) by income categories through the process of updating the Housing Elements of their General Plans. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and housing unit growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, addresses social equity, and distributes fair share housing needs.

Los Angeles County General Plan

Provisions of the Los Angeles County General Plan, adopted in 2015 with a horizon year of 2035, apply to unincorporated areas of Los Angeles County, including the SOI. The Land Use Element of the County's General Plan guides future development and revitalization efforts by designating the general distribution, location, and extent of uses on these lands and is the main mechanism for accommodating growth and change in unincorporated areas.

Los Angeles County Subdivision and Zoning Codes (Title 21 and 22)

The County's Zoning Code, Subdivision Code, and zoning map are implementation tools of the General Plan that provide details on allowable uses, design and development standards, and procedures. Zoning and subdivision regulations govern the division, design and use of individual parcels of land, including minimum lot size, lot configuration, access, height restrictions, and yard setbacks standards for structures. These apply to the unincorporated SOI portion of the Planning Area.

Local

Culver City General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. By law, a general plan must be an integrated, internally consistent statement of City policies. Government Code Section 65302 requires that a general plan include

the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Senate Bill (SB) 1000 and Gov. Code, § 65302 require that since disadvantaged communities have been identified within the city, the General Plan must also address Environmental Justice (EJ) either as a standalone element or integrating related goals, policies, and objectives throughout other elements.

The City's adopted General Plan includes nine elements that have been updated at various points between 1968 and 2014. The City's General Plan includes the Land Use Element (adopted in 1996 and amended through 2004), the Circulation Element (amended through 1995), the Housing Element (most recently updated in 2022), the Open Space Element (approved in 1996), the Noise Element (approved in 1996), Conservation Element (adopted in 1973), Seismic Safety Element (adopted in 1974), Public Safety Element (adopted in 1975), and Recreation Element (adopted in 1968). The City's General Plan is the principal land use policy instrument. An update of the General Plan is the proposed Project.

The General Plan 2045 includes a Community Health and Environmental Justice element. Additional elements may be included as well, at the discretion of the City. The General Plan 2045 includes six optional elements: Governance and Leadership; Arts, Culture, and the Creative Economy; Economic Development; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction; and Infrastructure.

Culver City Municipal Code

The Culver City Zoning Code (Title 17 of the Culver City Municipal Code [CCMC]) implements the policies of the General Plan by classifying and regulating the uses of land and structures within the City. The City's Zoning Code is being updated to be consistent with the proposed General Plan and is a component of the Project being evaluated in this Program EIR.

Culver City Bicycle and Pedestrian Action Plan

The Bicycle and Pedestrian Action Plan was adopted by the City Council in June 2020.⁴ The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community.

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) is a comprehensive long-term management plan that includes designations of tree species to be planted on each street segment when an existing tree must be removed, and best management practices for tree planning, preservation, and maintenance. In addition, the UFMP includes recommendations for green connections throughout the city to encourage recreation, walking, biking, and public transit use.

⁴ Culver City. 2020b. Bicycle and Pedestrian Action Plan. June 2020. <https://www.culvercity.org/files/assets/public/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf>. Accessed October 2023

Recommendations are also provided for plant palettes and planting structure, places of priority, designations of trees and plants to assist with wayfinding and placemaking, and action areas and strategies to be implemented by the City in public areas.⁵

Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan

Culver City and Culver City Unified School District (CCUSD) received a grant to prepare a MJHMP. The MJHMP presents a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan assesses the community's risks and vulnerabilities to natural hazard events such as earthquakes, flooding, and wildfire. The MJHMP includes a set of goals related to the overall goal of hazard mitigation planning and mitigation measures that will serve to advance the plan goals. The MJHMP was approved by Cal OES and FEMA on June 1, 2017. The MJHMP process has allowed the City to review and expand upon the policies contained in the General Plan's Safety Element. The City views the General Plan and the MJHMP as complementary planning documents that work together to achieve the ultimate goal of the reduction of risk exposure to residents within the Planning Area. Many of the ongoing recommendations identified in the MJHMP's mitigation strategy further the goals and policies of the General Plan and other adopted plans.⁶ Pursuant to regulatory requirements, the MJHMP is being updated concurrently with the General Plan 2045.

4.10.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to land use and planning if the project would:

- | | |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Threshold LU-1: | Physically divide an established community; |
| Threshold LU-2: | Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. |

Methodology

The policies of the General Plan 2045, as represented in the proposed text and land use map, were compared to existing conditions to determine the level of change that would occur with development under the update. The analysis was undertaken at a program level—that is, at a

⁵ Culver City. 2015. Culver City Urban Forest Master Plan. https://www.culvercity.org/files/sharedassets/public/city-hall/culver_city_urban_forest_master_plan.pdf. Accessed March 2023.

⁶ Culver City and Culver City Unified School District, 2017. Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/files/assets/public/documents/planning-amp-development/multijurisdictionalhazardm.pdf>. Accessed July 2023.

general rather than a parcel-specific level of detail. This approach is consistent with CEQA Guidelines Section 15146(b), which states:

An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

The planning horizon for the General Plan Update is 2045. The following analyses generally consider the level of development that may reasonably be expected to occur as a result of the Project through 2045.

The General Plan 2045 serves as the implementation mechanism for the Housing Element through the amendments to the Land Use Map, which would support the City’s efforts to meet the State-mandated RHNA. New development that would occur under the General Plan would primarily occur on parcels that already contain some existing development. The City’s primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the City’s commercial corridors through parking management strategies, active street frontage guidelines, and public realm improvements. To support the community’s housing vision, the land use vision allows for new residential and mixed-use development within the City’s industrial areas. With this approach to accommodating growth, it is anticipated that construction for infill and redevelopment of existing land uses would occur across many areas of the City, including those areas that would maintain land use designations similar to existing conditions.

The total development potential for 2045 under the General Plan 2045 would result in increased development of residential units as well as commercial, industrial, and institutional uses, as identified in **Table 4.10-2, General Plan 2045 Projections by Land Use**.

**TABLE 4.10-2
 GENERAL PLAN 2045 PROJECTIONS BY LAND USE**

Land Use	Existing (2019)	General Plan 2045 Projections	Net Change (General Plan 2045 - Existing)
Residential	17,010 units	29,710 units	12,700 units
Commercial	28,624,900 sf	31,956,900 sf	3,332,000 sf
Industrial	1,881,100 sf	2,245,900 sf	364,800 sf
Institutional	3,076,600 sf	3,076,600 sf	0 sf

sf = square feet

^a Studio uses, which are a defined General Plan land use designation, are included in the commercial square footage.

SOURCES: Raimi + Associates, Preferred Plan Growth Projections, November 2022; City of Culver City, existing land use data, 2019.

Project Impact Analysis

Physically Divide a Community

Threshold LU-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would physically divide an established community.

Impact Statement LU-1: The Project would not physically divide an established community. Therefore, the Project would result in a less than significant impact.

General Plan 2045

The Planning Area is an urban environment that is established with land uses at the parcel-level and a circulation system with very limited vacant land. The city is primarily built out with residential uses, of which only 0.6 percent is vacant land. Implementation of the Project would improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the city and the region. The General Plan 2045 provides strategies for thoughtful infill development and redevelopment that range from additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. Infill and redevelopment of existing land uses would occur across many areas of the City, including those areas that would maintain land use designations similar to existing conditions. The General Plan 2045 includes policies that require new development to be compatible and well-integrated with existing residential neighborhoods, maintaining smooth transitions in scale, form, and character through building setbacks, step backs, and rear landscaping (Policies LU-11.7 and LU-12.1); encourage compatible uses like schools, parks, recreation and community centers, art studios, and childcare facilities in residential neighborhoods (Policies LU-11.8 and LU-13.5); link existing residential neighborhoods by providing pedestrian and bicycle connections (Policies LU-11.9 and LU-13.6); and encouraging coordination with neighborhood associations throughout the City to facilitate community building and neighborhood identity (Policy LU-11.11). These policies would support connectivity within established communities.

The Project would also intensify and result in a mix of land uses on key segments of the commercial corridors, which would improve pedestrian experiences along the City's commercial corridors. The Project recognizes the physical elements that help define the character of the Planning Area and the city as a whole, including existing residential neighborhoods, activity centers, parks and open space, and commercial corridors. The General Plan 2045 includes policies that would promote new commercial uses and revitalize existing commercial areas in locations that provide convenient access to a range of goods and services for Culver City's residential neighborhoods (Policy LU-9.1); and encourage existing strip commercial corridors such as Washington, Sepulveda, and Jefferson Boulevards to intensify with standalone uses, concentrating neighborhood-serving commercial uses into mixed use activity centers (Policy LU-9.2). By distributing growth along corridors, including in areas well served by transit, housing would be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. As such, the Project would not physically divide an established community.

The land use patterns associated with the General Plan 2045 help establish a clear multi-modal network throughout the city by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in areas with mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities. The Project identifies planned pedestrian, multi-modal, and transit improvements for the city which would improve mobility between neighborhoods and allow residents to travel throughout the city. The General Plan 2045 includes policies to allow higher residential density and intensity in mixed use developments to support walkability and transit use (Policy LU-1.1); and incentivize jobs and housing growth around high-quality transit stops and along transit corridors (Policy LU-1.3). Policies aim to connect transit-oriented communities through strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities (Policy LU-1.4). Further the General Update would ensure that new project applications foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage (Policy LU-9.5). The General Plan 2045 also includes policies to create walkable connections in multifamily development (Policy LU-2.6); encourage more variety of public- and neighborhood-serving uses and affordable housing (Policy LU-8.1); and create community gathering spaces in mixed use districts to provide publicly accessible, centrally located private open space (Policy LU-8.2). These policies would encourage connectivity within the neighborhoods as well as throughout the city. The overall land use pattern would not change under the General Plan 2045 and the changes focus density in areas that would not result in a division of a community. Therefore, future development allowed under the General Plan 2045 would not physically divide an established community, and the impact would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities and intensities, setbacks, and heights. Therefore, the Zoning Code Update would not physically divide an established community and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design Element

LU-1.1: Higher densities near transit. Allow higher residential density and intensity in mixed use developments to support walkability and transit use.

LU-1.3: Development near transit stations. Incentivize jobs and housing growth around high-quality transit stops and along transit corridors to reduce reliance on personal automobiles. Incentivize affordable housing as standalone projects and mixed-income projects within transit-oriented communities.

LU-1.4: Connected transit-oriented communities. Develop strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities.

LU-2.6: Walkable connections in multifamily development. Encourage new multifamily developers to provide convenient, walkable connections to nearby trails, transit, and open space to promote active lifestyles.

- Place building lobbies adjacent to sidewalks and encourage multiple lobbies in larger projects.
- Locate required bicycle parking at the ground floor and convenient to sidewalk entrances.

LU-8.1: Mix of uses. Encourage more variety of public- and neighborhood- serving uses and affordable housing.

LU-8.2: Gathering spaces. Partner with project developers to create community gathering spaces, including plazas and pocket parks, in mixed use districts. Work with development projects to provide publicly accessible, centrally-located private open space with amenities as part of their site plans.

LU-9.5: Pedestrian and bicycle access to the corridor. Require new project applications to foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage.

LU-11.8: Neighborhood compatible uses. Encourage compatible uses like schools, parks, recreation and community centers, art studios, and childcare facilities in residential neighborhoods.

LU-11.9: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

LU-11.11: Neighborhood associations. Work with neighborhood associations throughout Culver City to facilitate community building and neighborhood identity.

LU-13.5: Neighborhood compatible uses. Encourage compatible uses like schools, parks, recreation and community centers, art studios, and childcare facilities in multifamily residential neighborhoods. Allow limited neighborhood-supportive retail and service uses in existing residential neighborhoods on collector and arterial street types to promote complete, walkable neighborhoods.

LU-13.6: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to physically dividing an established community.

Consistency with Applicable Land Use Plans

Threshold LU-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update caused 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.

Impact Statement LU-2: The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would result in a less than significant impact.

General Plan 2045

The proposed General Plan 2045 is intended to provide a framework and vision to guide growth and development within the Planning Area, which includes the City's jurisdictional boundaries and its SOI, through the planning horizon year of 2045. Implementation of the Project is anticipated to result in a net increase of 12,700 residential units, 3,332,000 square feet of commercial uses, and 364,800 square feet of industrial uses within the city. Changes in buildout capacity that would result from implementation of the General Plan 2045 are largely due to intensification of land uses expected within the Planning Area resulting from infill development and redevelopment.

The land use pattern established in the General Plan 2045 through the 2045 planning horizon year aims to allow residents to live close to where they work, shop, and recreate, thereby reducing vehicle trips and associated energy consumption, pollution, noise, and greenhouse gas emissions. This land use development pattern could improve human health and increase social interaction by encouraging walking, biking, and transit use. The following provides a consistency analysis of the General Plan 2045 with applicable state and regional laws, regulations, plans, and guidelines.

State Planning Law

The General Plan 2045 is consistent with California Government Code Section 65302 as it contains the required elements including: Land Use and Community Design, Housing, Mobility ('Circulation' in the code), Conservation, Safety, Environmental Justice, and Noise. The 2021-2029 Housing Element of the City's General Plan was adopted in 2022. The General Plan 2045 also includes six optional elements: Governance and Leadership; Arts, Culture, and Creative Economy; Economic Development; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction; and Infrastructure. The Project revises the General Plan Land Use Diagram, implements the Housing Element, and guides the overall physical development and circulation of the Planning Area through horizon year 2045. The General Plan 2045 contains policies to guide decision-making related to land use and community character; equity, community health and environment; public safety; housing; mobility; parks and recreation; infrastructure; greenhouse gas reduction; conservation; safety; and noise.

Land uses proposed within the Planning Area can be broken down into four main categories of development: activity centers, commercial corridors, residential neighborhoods, and parks/open

space. The Land Use and Community Design Element includes goals and policies that support the City’s land use approach and vision.

Each of the specific and applicable requirements in the state planning law (Government Code § 65300) have been examined and considered to determine if there are environmental issues that the General Plan should address, such as fire hazards and flooding. The various environmental issues associated with the General Plan 2045 (air quality, hazards, flooding, traffic, etc.) are addressed in their respective topical sections in Chapter 4, Environmental Analysis, of this Draft PEIR. The General Plan 2045 would not conflict with the State Planning Law.

SCAG 2020 RTP/SCS

SCAG’s 2020 RTP/SCS contains goals that are applicable to the Project, which are discussed below. **Table 4.10-3, Consistency of the Project with Applicable Goals of the 2020 RTP/SCS,** provides a detailed consistency analysis of the Project with applicable 2020 RTP/SCS goals.

**TABLE 4.10-3
 CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF THE 2020 RTP/SCS**

Goal	Analysis of Proposed Project Consistency
1. Encourage regional economic prosperity and global competitiveness.	Consistent. This goal pertains to SCAG funding and policies. The Project would not adversely affect the capacity to encourage regional economic prosperity and global competitiveness. The Project would support the goal as it aims to support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of uses that provide employment and commercial opportunities. The Project would not conflict with this goal.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. The General Plan 2045 includes a Mobility Element which establishes a policy framework and proposed citywide network for all transportation modes and provides the Mobility Plan, which establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation. The Project has adapted Multimodal Street Classification principles to transition from a highway-centric functional classification system to better integrate land use context and non-motorized transportation components in the transportation network. The Project includes modal priority and special roadway designation typologies that enable the reallocation of public rights-of-way to promote and encourage safe use of alternative transportation modes. The Mobility Element also designates truck routes in order to facilitate goods movements while minimizing travel through residential streets. As such, the Project would be consistent with this goal.
3. Enhance the preservation, security, and resilience of the regional transportation system.	Consistent. The Project includes adapted Multimodal Street Classification principles to transition from a highway-centric functional classification system to better integrate land use context and non-motorized transportation components in the transportation network. The Project includes modal priority and special roadway designation typologies that enable the reallocation of public right-of-way to promote and encourage safe use of alternative transportation modes. The Project does not include policies or goals that would adversely affect the regional transportation system.
4. Increase person and goods movement and travel choices within the transportation system.	Consistent. As described above, the General Plan 2045 includes a Mobility Element which establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation. The Project includes modal priority and special roadway designation typologies that enable the reallocation of public rights-of-way to promote and encourage safe use of alternative transportation modes. The Mobility Element also designates truck

Goal	Analysis of Proposed Project Consistency
	<p>routes in order to facilitate goods movements while minimizing travel through residential streets.</p>
<p>5. Reduce greenhouse gas emissions and improve air quality.</p>	<p>Consistent. The Greenhouse Gas Reduction Element includes goals and policies that address sustainability including greenhouse gas emissions, landfill disposal, water efficiency, and transportation. This element also includes goals and policies related to adaptation and resiliency planning. As part of this element, a GHG emissions inventory was prepared in 2019 in order to track the City's GHG emissions, set a baseline, and identify reductions needed to align with Statewide targets. The Greenhouse Gas Reduction Element of the General Plan 2045 includes goals designed to reach carbon neutrality, decarbonize the transportation sector, develop green buildings, develop energy efficient buildings and facilities, achieve zero waste. Specific General Plan 2045 policies that would be consistent with this goal include updates to the community and municipal GHG inventories every five years to track progress toward achieving the City's GHG reduction goal (Policy GHG-1.1); GHG reduction measures (Policy GHG-1.2); evaluation of new and emerging technology changes that can help to reduce GHG emissions (Policy GHG-1.3); and initiate or support legislation and regulations designed to establish achievable targets and to fund programs that ensure that all cities can achieve their GHG reduction goals (Policy GHG-1.5). See Section 4.7, Greenhouse Gas Emissions, for further discussion.</p>
<p>6. Support healthy and equitable communities.</p>	<p>Consistent. The General Plan 2045 includes an update to the Mobility Element. The policies and actions in the Mobility Element prioritize improvements that seek to increase physical activity and improve access to healthcare and social services, schools, employment, and healthy foods. The Project helps to operationalize equity indicators within priority implementation and funding decisions to ensure that future investments address gaps in underinvested areas and for the most vulnerable users of the network. It also highlights targeted investments in SB 1000 Priority Neighborhoods, such as high frequency transit service and pedestrian safety projects at major intersections, to improve transit efficiency and reliability, create safer pedestrian environments to promote walking, and expand first- and last-mile mobility options near key commercial areas.</p> <p>The General Plan 2045 also includes an update to the Parks, Recreation, and Public Facilities Element, which includes goals and policies related to improvements the City can undertake to improve access, amenities, and funding for the park and recreational resources within the city. The Parks and Recreation Element establishes policies to reduce inequities for residences within one half mile walking distance of a park or recreational facility, plans for parks and other outdoor recreational spaces in these neighborhoods, and establishes a performance metric to track the percent of population within walking distance of a park. The Project would provide goals and policies as well as direct resources to improve park and recreational resource quantity, quality, and access.</p>
<p>7. Adapt to changing climate and support an integrated regional development pattern and transportation network.</p>	<p>Consistent. The Project includes modal priority and special roadway designation typologies that enable the reallocation of public rights-of-way to promote and encourage safe use of alternative transportation modes. Accessibility to alternative transportation modes would support this goal that encourages adaptation to changing climate. In addition, the Mobility Element establishes a policy framework and proposed citywide network for all transportation modes and provides the Mobility Plan, which establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation.</p>
<p>8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.</p>	<p>Consistent. This goal pertains to SCAG leveraging new transportation technologies and data-driven solutions that result in more efficient travel. The Project would not adversely affect SCAG's ability to develop more efficient travel consistent with this goal.</p>

Goal	Analysis of Proposed Project Consistency
<p>9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p>Consistent. The Housing Element of the City's General Plan is the primary planning tool to meet the housing needs of Culver City. It outlines goals, policies, and programs to meet these needs while balancing other community objectives and resources. While the Housing Element was adopted in 2022, the General Plan 2045 serves as the implementation mechanism for the Housing Element through the amendments to the Land Use Map, which would support the City's efforts to meet the State-mandated RHNA. The RHNA allocation for the City during the 2021-2029 planning period is 3,341 units. The Project would provide for 12,700 additional housing units at buildout.</p> <p>Future development would primarily occur on parcels that already contain some development. The City's primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. By distributing growth along corridors, including in areas well served by transit, housing will be incrementally added in existing residential areas, providing access to opportunities, such as jobs, neighborhood amenities, and health care facilities. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the City's commercial corridors through parking management strategies, and public realm improvements.</p> <p>The Mobility Element establishes a policy framework and proposed citywide network for all transportation modes and provides the Mobility Plan, which establishes the future mobility framework for the City including vehicular, transit, pedestrian, bicycle, and multi-modal circulation.</p>
<p>10. Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p>Consistent. The General Plan 2045 includes an update to the Conservation Element, which provides goals and policies for the protection and preservation of cultural resources, including archaeological, and historic resources, paleontological resources, as well as biological resources, water resources, air quality, and mineral resources. The goals and policies of the Conservation Element also direct the city's activities related to revitalization of Ballona Creek as a recreational corridor and restoration of the IOF. These policies will serve to protect and conserve environmental features within the City during implementation of Project.</p>

SOURCE: ESA, 2023.

As shown in Table 4.10-3, the Project would be consistent with 2020 RTP/SCS goals to encourage economic prosperity; improve mobility, accessibility, reliability, and travel safety; enhance the preservation security, and resilience of the regional transportation system; increase the productivity of the transportation system, reduce GHG emissions and improvement of air quality; support healthy and equitable communities; adapt to climate change and support an integrated regional development pattern; leverage new transportation technologies and data driven solutions that result in more efficient travel; encourage development of diverse housing types; and promote conservation of natural and agricultural lands and restoration of habitats. Therefore, the Project would result in a less than significant impact with regard to consistency with the 2020 RTP/SCS.

Similar to supporting the goals of the 2020 RTP/SCS, the General Plan 2045 supports SB 743 which promotes the State's goals of reducing greenhouse gas emissions and traffic-related air

pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations, by increasing connectivity within the city. The General Plan 2045 aims to increase sustainability through the land use development pattern. Growth would be distributed along corridors, and future development that would occur under the Project would be predominantly located on infill sites within transit priority corridors, or in areas well served by transit. Furthermore, the General Plan 2045 includes the Greenhouse Gas Reduction Element which includes goals and policies that address sustainability including greenhouse gas emissions, landfill disposal, water efficiency, and transportation. This element also includes goals and policies related to adaptation and resiliency planning. By designating land uses in a way that encourages higher density within transit areas, the Project would support sustainability within the City.

California Complete Streets Act Consistency

The General Plan 2045 includes policies that support the City's efforts to implement the Complete Streets Act (AB 1358). (See Section 4.16, Transportation, for a discussion regarding the Complete Streets Act.) Specifically, Land Use Element Policy LU-7.2 and Mobility Element Policy M-2.1 include measures to prioritize walking and biking by breaking up large blocks into a finer grained network and through complete streets improvements and guide project selection and delivery based on complete streets principals. Refer to Section 4.16, Transportation, for a detailed discussion of the proposed project's consistency with AB 1358.

Regional Housing Needs Assessment

The City recently adopted the 2021-2029 Housing Element Update, which is one of the State-mandated elements that must be included in the General Plan. State law stipulates that the Housing Element include certain items, such as a Housing Needs Assessment; goals, policies, and objectives regarding housing in City; and implementation programs to work toward achieving those goals. For the 6th Cycle Housing Element planning period of 2021 to 2029, the City received a RHNA allocation of 3,341 units. Per State mandate, the City must zone sufficient land for housing affordable to people at all income levels. The General Plan 2045 includes the land use and zoning amendments necessary to allow for the development of the residential units needed to meet the City's 6th cycle RHNA allocation. As such, the Project would designate land so as to meet the City's RHNA housing allocation and would not conflict with the RHNA.

Culver City and Culver City Unified School District (CCUSD) Multi-Jurisdictional Hazard Mitigation Plan

The MJHMP presents a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan assesses the community's risks and vulnerabilities to natural hazard events such as earthquakes, flooding, and wildfire. The MJHMP includes a set of goals related to the overall goal of hazard mitigation planning and mitigation measures that will serve to advance the plan goals. The General Plan and the MJHMP are complementary planning documents that together achieve the goal of the reduction of risk exposure to residents within the Planning Area. Many of the ongoing recommendations identified in the MJHMP's mitigation

strategy further the goals and policies of the General Plan and other adopted plans. Pursuant to regulatory requirements, the MJHMP is being updated concurrently with the General Plan 2045.

The General Plan 2045 contains policies that aim to update emergency-related planning documents (including the MJHMP) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science (Policy S-1.1); continuing to incorporate the hazards and mitigation measures identified in the MJHMP into City emergency planning, capital projects, and programs (Policy S-1.2); continuing to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations (Policy S-1.3); and requiring all development proposals to identify existing evacuation routes or establish new evacuation routes as needed (Policy S-7.14). As such, the General Plan 2045 would not conflict with the MJHMP.

Culver City Bicycle & Pedestrian Action Plan

The Culver City Bicycle & Pedestrian Action Plan (BPAP) establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The BPAP aims to provide a safe, convenient, and accessible active transportation network. The BPAP includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community. The General Plan 2045 includes policies to develop strong pedestrian and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities (Policy LU-1.4); require new project applications to foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage (Policy LU-9.5); and link existing residential neighborhoods by providing pedestrian and bicycle connections (Policies LU-11.9 and LU-13.6), which would support the BPAP. Furthermore, the General Plan 2045 includes Policy M-2.1 which would guide project selection and delivery based on complete streets principals and addressing the gaps identified by Bicycle Network Assessment Areas, the BPAP, and American with Disabilities (ADA) Transition Plan, and Policy M-8.5 which aims to align with the BPAP and expand the network recommendations as needed to facilitate a complete and interconnected citywide active transportation network. The Project would support and not conflict with the existing and planned bicycle and pedestrian networks identified in the BPAP.

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) is a comprehensive long-term management plan that includes designations of tree species to be planted on each street segment when an existing tree must be removed, and best management practices for tree planning, preservation, and maintenance. The UFMP includes recommendations for green connections throughout the City to encourage recreation, walking, biking and public transit use to be implemented by the City. The General Plan 2045 includes implementation action to develop parks that sustain and urban forest and ensure updates to the UFMP. The General Plan 2045 would not conflict with objectives of the UFMP.

In summary, based on the above the General Plan 2045 would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would result in a less than significant impact.

Zoning Code Update

The Zoning Code Update is the mechanism to implement the land use changes proposed in the City's General Plan 2045 that will encourage development through the planning horizon. The proposed Zoning Code Update would provide the specific regulations, development standards, and performance criteria to govern development on individual properties as required by State law [Government Code Section 65860(a)]. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not 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 and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design Element

LU-1.4: Connected transit-oriented communities. Develop strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities.

LU-7.2: Walkable streets in Fox Hills. Prioritize walking and biking by breaking up large blocks into a finer grained network and through complete streets improvements.

LU-9.5: Pedestrian and bicycle access to the corridor. Require new project applications to foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage.

LU-11.9: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

LU-13.6: Pedestrian and bicycle connectivity in residential neighborhoods. Link existing residential neighborhoods by providing pedestrian and bicycle connections.

M-2.1: Prioritize multimodal projects. Guide project selection and delivery based on complete streets principals and addressing the gaps identified by Bicycle Network Assessment Areas, the Bicycle and Pedestrian Action Plan (BPAP) and American with Disabilities (ADA) Transition Plan.

M-8.5: Bicycle and Pedestrian Action Plan (BPAP) alignment. Align with the BPAP and expand the network recommendations as needed to facilitate a complete and interconnected citywide active transportation network.

S-1.1: Emergency-related planning documents. Continue to update emergency-related planning documents (including the Multi-Jurisdictional Hazard Mitigation Plan) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science.

S-1.2: Multi-Jurisdictional Hazard Mitigation Plan. Continue to incorporate the hazards and mitigation measures identified in the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) into City emergency planning, capital projects, and programs.

S-1.3: Evacuation plan. Continue to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations.

S-7.14: Evacuation routes. Require all development proposals to identify evacuation routes or establish new evacuation routes as needed.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.10.5 Cumulative Impacts Analysis

The geographic context for the analysis of cumulative impacts associated with land use issues is the western area of Los Angeles County, which assumes full build-out of the General Plan 2045, in combination with build-out of neighboring jurisdictions' General Plans. Future development in the area, including growth anticipated under the proposed General Plan 2045, would not physically divide an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as future development in each jurisdiction would be required to be consistent with each jurisdiction's General Plan and zoning code. In addition, future development in the western area of Los Angeles County would be required to be consistent with regional plans such as SCAG's Connect SoCal Plan and the RHNA. Finally, future development in the area would be required to undergo planning review in the respective jurisdiction, which would ensure the future development would not divide an established community and would be consistent with applicable land use plans, policy, or regulation. For these reasons, future development in the western area of Los Angeles County, including growth anticipated under the General Plan 2045, would have a less-than-significant cumulative impact with respect to land use and planning. The Project would result in less than significant cumulative impacts related to physically dividing an established community and conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.11 Mineral Resources

4.11.1 Introduction

This section of the Draft PEIR evaluates potential local and regional environmental impacts on mineral resources in the Planning Area from implementation of the Project, including potential impacts related to known mineral resources and locally important mineral resource recovery sites. The section provides context regarding the Planning Area's existing mineral resources, including oil resources, as well as relevant federal, State, and local regulations and programs.

4.11.2 Environmental Setting

Since the California Environmental Quality Act (CEQA) does not specifically define mineral resources, the definition of mineral resource from the Department of Conservation, State Mining and Geology Board, United States Bureau of Mines, and United States Geological Survey is used for this Draft PEIR. These agencies define mineral resources as “a concentration of naturally occurring solid, liquid, or gaseous material in or on the Earth’s crust in such form and amount that economic extraction of a commodity from the concentration is currently or potentially feasible.”¹ As such, both non-fuel mineral resources (e.g., aggregate – sand or gravel) as well as petroleum resources are discussed in this section.

Existing Geologic Setting

As described in Section 4.6, *Geology and Soils*, the Planning Area is located within the Peninsular Ranges Geomorphic Province and Los Angeles Basin. The Los Angeles Basin is bound by the Palos Verdes fault to the south; the San Gabriel Foothill fault to the north; the Santa Ana Mountains and San Joaquin Hills to the east and southeast; and the Santa Monica Mountains to the northwest. The predominant rock type that underlies the Peninsular Ranges province is a Cretaceous age igneous rock (granitic rock) referred to as the Southern California batholith. Older Jurassic age metavolcanic and metasedimentary rocks and older Paleozoic limestone, altered schist, and gneiss are present within the province. Cretaceous-age marine sedimentary rocks and younger Tertiary-age rocks comprised of volcanic, marine, and non-marine sediments overlie the older rocks. More recent Quaternary sediments, primarily of alluvial origin, comprise the low-lying valley and drainage areas within the region.

The Planning Area is located on the western side of the Los Angeles Basin, approximately 1.5 miles from the Pacific Ocean. The topography of the Planning Area is relatively flat with areas of rolling hills. The elevations vary from a low of 40 feet above mean sea level (amsl) in the western portion of the Planning Area, approximately 100 feet amsl in the central part, to approximately 400 feet amsl in the eastern portion in Baldwin Hills. A review of the geologic setting of the Planning Area indicate that younger alluvium deposits (*Qa*) exist within the northern, southern, and western portions of the Planning Area while older alluvium (*Qoa*), Paleosol (*Qop*), artificial fill (*af*), and Sand Pedro Sand (*Qsp*) sediments are present in the

¹ United States Bureau of Mines, Principles of a Resource/Reserve Classification for Minerals. Available at: <https://pubs.usgs.gov/circ/1980/0831/report.pdf>. Accessed May 2023.

southern portion. Lastly, landslide debris (*Q_ls*) and Inglewood Formation deposits (*Q_i*) are also found within the northeastern portion of the city.

The Planning Area, which includes the City and the Sphere of Influence (SOI), also includes oil and gas resources within the Inglewood Oil Field (IOF), discussed in more detail below.

Aggregate Material Resources (Sand and Gravel)

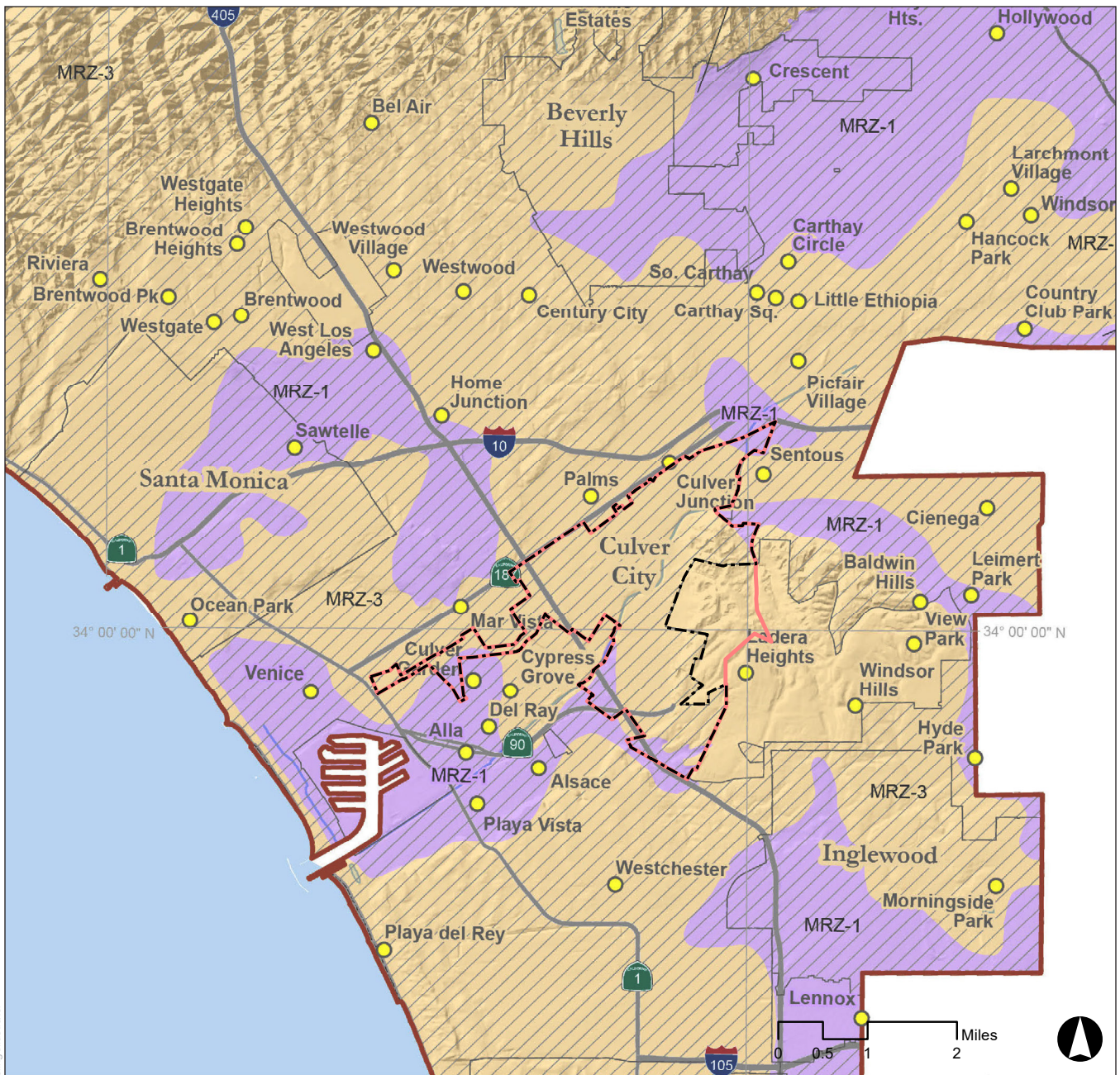
Construction aggregate is California's primary mineral resource. As required by the Surface Mining and Reclamation Act (SMARA) of 1975, the California Geological Survey (CGS) defines several geographic areas that collectively cover a single mineral classification study area as "Production-Consumption Regions" (P-C Regions). The CGS identifies Mineral Resource Zones (MRZs) for each P-C Region, mine/quarry, or other geographic area included in a mineral classification study. MRZs are areas classified by the presence or absence of significant sand, gravel, or stone deposits that are suitable as sources of aggregate, as described in greater detail below:

- MRZ-1: Areas where available geologic information indicates there is little or no likelihood for presence of significant mineral resources.
- MRZ-2: Areas where available geologic information indicates that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- MRZ-3: Areas where available geologic information indicates known or inferred mineral occurrences of undetermined mineral resource significance.
- MRZ-4: Areas of no known mineral occurrences where geologic information does not rule out the presence or absence of significant mineral resources.

As shown on **Figure 4.11-1, Mineral Resources Zones (MRZs) within the Planning Area**, the majority of the Planning Area is identified as MRZ-3 due to areas containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance.² In addition, areas of MRZ-1 have been identified in parts of the northern, southern, and western portions of the Planning Area, where available geologic information indicates that little likelihood exists for the presence of significant Portland cement concrete aggregate resources.³

² California Geological Survey (CGS), 2021. Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. Available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_254-MLC-SanFernandoValleySaugusNewhallPCR-2021-Plate01-MRZs-a11y.pdf. Accessed May 2023.

³ CGS, 2021. Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. Available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_254-MLC-SanFernandoValleySaugusNewhallPCR-2021-Plate01-MRZs-a11y.pdf. Accessed May 2023



- City Limits
 - Sphere of Influence
 - City, Incorporated
 - City
- Mineral Resource Zone**
- MRZ-1
 - MRZ-3

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021; CGS, 2021

Culver City General Plan 2045

Figure 4.11-1
Mineral Resources Zones (MRZs) within the Planning Area



Based on a review of the information contained in the California Department of Conservation (CDC), Office of Mine Reclamation (OMR) database, there are no aggregate mines or other identified mineral resources (e.g., shale, diatomite, clay or gypsum) mines within the Planning Area.⁴

Oil and Gas Resources

The Inglewood Oil Field (IOF), which is one of the largest urban oil fields in the nation and has been in continuous operation since 1924, straddles Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. **Figure 4.11-2, *Inglewood Oil Field Context Map***, shows the general location of IOF, with the surface field and mineral rights boundaries as defined by the Oil Field Operator, and the productive field limits and field boundary as defined by the California Energy Management Division (CalGEM).⁵ Based on the Surface Field Boundaries, the IOF encompasses approximately 1,000 acres, with roughly 80 acres within the limits of Culver City and the remaining 920 acres within unincorporated Los Angeles County, of which approximately 400 acres are located within the SOI.⁶

The IOF is located within the eastern portion of the Planning Area and is currently designated as open space in the Culver City General Plan, as shown on Figure 2-6, *Draft General Plan Land Use Map*, in Chapter 2, *Project Description*. In 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (BHCS), which established the oil and gas regulations for operation of the County's portion of the IOF within the unincorporated area just easterly of and adjacent to Culver City.

According to the California State Oil and Gas Supervisor 2020 Annual Report, the entire IOF produced approximately 1,530,112 barrels of oil and condensate and 791,995,000 cubic feet of gross gas in 2020.⁷ No new wells have been drilled within the IOF since 2014 and current operations consist of oil and gas extraction, produced water injection, routine well and facility maintenance, and periodic well plugging and abandonment.⁸

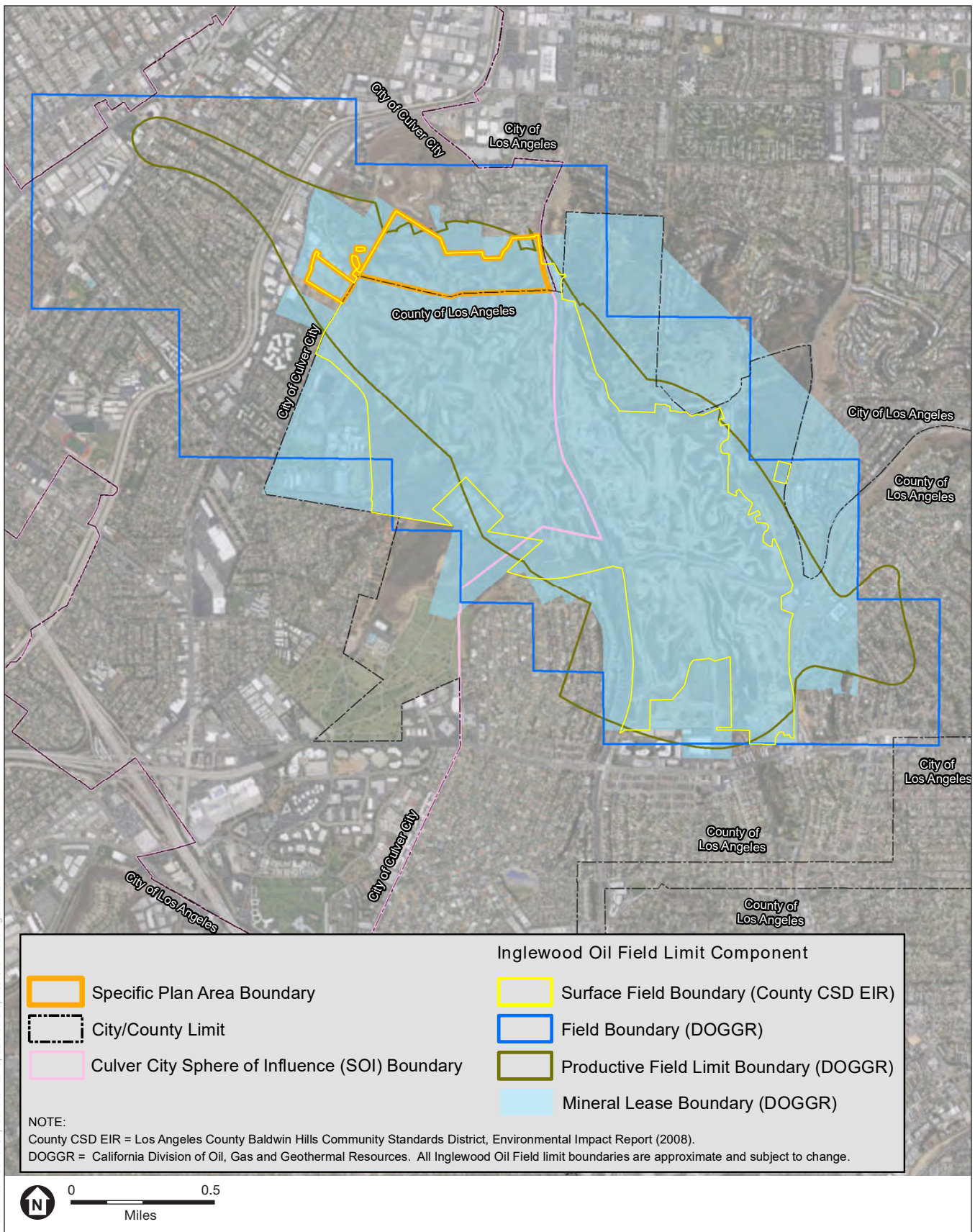
⁴ California Department of Conservation, Office of Mine Reclamation (OMR), 2016. Mines Online Database – Culver City. Available at: <https://maps.conservation.ca.gov/mol/index.html>. Accessed May 2023.

⁵ Culver City, 2017a. Inglewood Oil Field Specific Plan. Available at: <https://www.culvercity.org/files/assets/public/v/1/documents/city-manager/inglewood-oil-field/environmental-review-process/b1specificplan.pdf>. Accessed December 2023.

⁶ References to the portion of the IOF in the Planning Area includes the combined portions of the IOF in the City and SOI. Otherwise, specific portions of the IOF will be identified as necessary to provide clarity to the reader.

⁷ California Geologic Energy Management Division (CalGEM), 2020. California State Oil and Gas Supervisor 2020 Annual Report. Available at: CALIFORNIA STATE OIL AND GAS SUPERVISOR ANNUAL REPORT 2020. Accessed December 2023.

⁸ Culver City, 2017b. Inglewood Oil Field Specific Plan Project Draft Environmental Impact Report. Available at: <https://www.culvercity.org/files/assets/public/v/1/documents/city-manager/inglewood-oil-field/environmental-review-process/toc091117.pdf>. Accessed December 2023.



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SOURCE: Google Earth Aerial, 02-2016; DOGGR, 2016; City of Culver City, 2016; Planning PLUS/P+, 2017

Culver City General Plan 2045

Figure 4.11-2
Inglewood Oil Field Context Map



Ongoing Inglewood Oil Field Closure Settlement

The City Council initiated preparation of an amortization study in 2017 to evaluate and financially and factually support ending oil and gas extraction activities within the approximately 80-acre portion of the IOF within the City. As a result of the information learned through the completed amortization study, in concert with other community safety considerations, in October 2021, the City adopted an Oil Termination Ordinance (Zoning Code amendment P2021-0036-ZCA) to implement an amortization program that would terminate and phase out nonconforming oil and gas activities within the Culver City portion of the IOF by November 24, 2026. On November 14, 2022, the City Council approved a settlement framework with the operator of the Culver City portion of the IOF that requires the operator to plug and abandon all wells and complete the overall closure of the City's portion of the IOF by December 31, 2029, with the potential for an extension to December 21, 2032 under special circumstances.

Similar to the City, the County adopted an Oil Well Ordinance for unincorporated areas of the County on June 8, 2022, which amended Title 22, *Planning and Zoning of the Los Angeles County Code*, to prohibit new oil wells and production facilities in all zones, designates existing oil wells and production facilities as nonconforming uses in all zones, and establishes regulations for existing oil wells and production facilities. While the County's Oil Well Ordinance originally did not apply to the BHCS D, specific plans, or uses operating under a valid discretionary permit⁹, in July 2023, the County released draft language for a proposed amendment to the BHCS D that would effectively prohibit any new drilling, redrilling or deepening within the County's portion of the IOF and establish oil and gas activities as a nonconforming use.¹⁰

4.11.3 Regulatory Framework

This section provides the relevant State, regional, and local regulations applicable to the Project. There are no federal regulations which apply to the Project.

State

California Department of Conservation Geologic Energy Management Division

Effective January 1, 2020, the California Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) was renamed to the Geologic Energy Management Division (also known as CalGEM) along with a new focus at assisting the State's goal of becoming carbon-neutral by 2045 by managing the decline of oil production and consumption within the state. To support this goal, CalGEM has established a series of initiatives to safeguard public health, emphasize environmental protection, and reduce climate impacts associated with oil production.

⁹ Los Angeles County, Department of Regional Planning, 2023b. Oil Well Ordinance. Available at: <https://planning.lacounty.gov/long-range-planning/oil-well-ordinance/>. Accessed May 2023.

¹⁰ Los Angeles County, Department of Regional Planning. 2023a. Baldwin Hills Community Standards District. Available at: Baldwin Hills CSD - LA County Planning. Accessed December 2023.

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) of 1975 provides comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state's mineral resources. As required by SMARA, the State Geologist is to classify land into MRZs according to its known or inferred mineral potential. One of the goals of mineral land classification is to ensure that mineral potential of land is identified and considered before local government decision makers make land use decisions that could limit the ability to mine resources.

Mineral Resources and Mineral Hazard Mapping Program

CGS provides geologic expertise and information about California's diverse non-fuel mineral resources. As required by the SMARA of 1975, the State Geologist classifies these resources in an effort to locate economically significant mineral deposits and potential areas of deposits based upon scientific data. Information relating to California's non-fuel resources, naturally occurring mineral hazards, and active and historic mining activities are collected to classify land under the Mineral Resources and Mineral Hazards Mapping Program. As described above, CGS defines several geographic areas that collectively cover a single mineral classification study as P-C Regions. CGS identifies MRZs for each P-C Region, mine/quarry, or other geographic area included in a mineral classification study. MRZs are areas classified by the presence or absence of significant sand, gravel, or stone deposits which are suitable as sources of aggregate.

Regional

Los Angeles County General Plan

Provisions of the Los Angeles County General Plan apply to unincorporated areas of Los Angeles County, including the SOI for Culver City analyzed in this PEIR.

Los Angeles County – Baldwin Hills Community Standards District

On October 28, 2008, the County's Board of Supervisors adopted the Baldwin Hills Community Standards District (BHCS D) and certified the associated Environmental Impact Report. The BHCS D establishes development standards and operating procedures for oil and gas operations in the unincorporated County portion of the IOF, which includes approximately 900 acres and over 700 wells. The BHCS D ensures that oil field operations are conducted in a safe manner and are compatible with the surrounding uses, including uses within Culver City and the City's portion of the IOF. The County is currently in the process of amending the BHCS D to effectively prohibit any new drilling, redrilling or deepening within the County's portion of the IOF and establish oil and gas activities as a nonconforming use.¹¹

¹¹ Los Angeles County, Long Range Planning Department, 2023a. Baldwin Hills Community Standards District Amendment Website. Available at: Baldwin Hills CSD - LA County Planning. Accessed December 2023.

Los Angeles County Municipal Code

Chapter 23.310, Baldwin Hills Community Standards District, of the Los Angeles County Municipal Code (LACMC) contains the regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of the unincorporated County, including that portion of the IOF that is within the City SOI. The LACMC establishes these supplemental regulations to ensure that oil field operations are conducted in a manner compatible with surrounding land uses, to minimize the potential adverse impacts of such operations, and to enhance the appearance of the site with landscaping and other property maintenance requirements.

Local

Culver City Municipal Code

Chapter 11.12, Oil, Gas, and Hydrocarbons, of the Culver City Municipal Code (CCMC) establishes the permit, operations, and other requirements related to oil, natural gas, and hydrocarbons production within the City. . As discussed above, the Oil Termination Ordinance (CCMC Section 17.610.D) requires that all nonconforming oil uses, regardless of the applicable zoning district or whether an oil use was previously lawfully established or permitted, shall be terminated and be discontinued. In addition, the Oil Termination Ordinance prohibits establishing any new or expanded oil and gas activities after November 24, 2021.

4.11.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold MIN-1:** 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.
- Threshold MIN-2:** 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.

Methodology

This evaluation of mineral resources, including oil and gas, within the Planning Area that could potentially be impacted by the Project was completed using published geologic and soils maps and information from CGS and Los Angeles County. Using these resources, potential impacts were analyzed according to the Project's potential to result in the loss of available known mineral resources.

Project Impact Analysis

Known Mineral Resource, Locally Important Mineral Resource Recovery Site

Threshold MIN-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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.

Threshold MIN-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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.

Impact Statement MIN-1 and MIN-2: Since the Planning Area is not within an identified MRZ for significant mineral resources, future growth resulting from implementation of the Project would not impact regionally important aggregate material resources. In addition, the Project would not change the land use designation resulting in future development within the City's portion of the IOF and thus, would not result in the loss of the regionally or locally important oil and gas resources. Therefore, impacts to mineral resources would be less than significant.

General Plan 2045

Aggregate Material Resources

As discussed under Section 4.11.2, *Environmental Setting*, the Planning Area contains areas designated MRZ-1 and MRZ-3. MRZ-1 indicates that no significant mineral resources are present or it is judged that little likelihood exists for their presence and MRZ-3 indicates a mineral resource zone where the significance of mineral deposits cannot be determined from the available data. In addition, the Planning Area is not known to contain sand or gravel deposits of any economic importance or any otherwise "classified" non-fuel mineral deposits under SMARA. Based on information contained in the OMR database, there are no aggregate or other mineral resource (shale, diatomite, clay or gypsum) mines within the Planning Area¹². Therefore, implementation of the General Plan 2045 would not result in the loss of availability of a known non-fuel mineral resource that would be of value to the region and residents of the State, nor would it create the loss of availability of a locally important mineral resource recovery site. No impact to aggregate mineral resources would occur with implementation of the General Plan 2045.

Oil and Gas Resources

The currently adopted Culver City General Plan does not identify any local mineral resource recovery sites within the City but does identify the ongoing production of oil and gas associated with the City's portion of the IOF.¹³ While there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which requires the closure of the City's portion of the IOF. The closure of the City's portion of the IOF is an existing,

¹² California Department of Conservation, Office of Mine Reclamation (OMR), 2016. Mines Online Database – Culver City. Available at: <https://maps.conservation.ca.gov/mol/index.html>. Accessed May 2023.

¹³ Culver City, 1973. Culver City General Plan – Conservation Element. Available at: [conservazionelement.pdf](https://www.conservazionelement.pdf) (culvercity.org). Accessed May 2023.

ongoing process initiated by the City, independent from the Project and is therefore, considered to be a part of the environmental baseline for the analysis within this PEIR.

While the General Plan 2045 proposes a range of land use changes throughout the Planning Area, the proposed land use designations, as shown on Figure 2-6, *Draft General Plan Land Use Map*, in Chapter 2, *Project Description*, would not change the existing open space land use designation for the IOF that lies within the Planning Area. This designation would allow future open space, recreational, and/or park development on the City's portion of the IOF and on the portion of the IOF in the SOI if annexed into the City in the future. Since the City's portion of the IOF would remain open space, implementation of the General Plan 2045 would not remove the existing oil and gas deposits nor preclude access to the oil and gas through development of this area in accordance with the General Plan. Furthermore, if the SOI is annexed by the City in the future, the open space designation would also ensure the presence and access to the existing oil and gas deposits would remain for this portion of the IOF in accordance with the City's General Plan. Therefore, the General Plan 2045 would not result in the loss of the availability of the existing oil and gas resources. The Conservation Element of the General Plan 2045 includes goals and policies, as listed below, that support the closure of the City's portion of the IOF, which includes implementation of the IOF Amortization Plan, which has already been initiated by the City as discussed above.

Therefore, implementation of the General Plan 2045 would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation in a manner that would render the resources unavailable. As such, the General Plan 2045 would not result in the loss of a regionally and locally important mineral resource. Impacts related to oil and gas resources would be considered less than significant.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development within the City's portion of the IOF would be required to comply with the requirements of the open space district in the Zoning Code Update. Therefore, future development within the City under the Project would result in a less-than-significant impact related to mineral resources.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-5: Mineral and Natural Resources. Mineral and natural resources within the IOF are produced while balancing social values, such as safety and the environment.

C-5.1: IOF Amortization Plan. Implement an amortization plan to terminate and phase-out all nonconforming oil and gas activities within the Culver City portion of the IOF and encourage transition to alternate uses for portions of the IOF outside of, but adjacent to, Culver City.

C-5.2: IOF Coordination. Coordinate with the County and City of Los Angeles and other agencies to promote compatibility between activities conducted at or planned within the IOF area and other surrounding community uses.

C-5.3: Future Land Use Considerations for the IOF. Prioritize the public health, safety, and welfare of the community and develop a strategy for future land use considerations for the IOF.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less-than-significant impacts related to mineral resources.

4.11.5 Cumulative Impacts Analysis

The geographic context for the analysis of impacts related to mineral resources is Los Angeles County. As discussed above, the General Plan 2045 would have no impact related to non-fuel mineral resources. Since the Project would not change the existing land use designation of the IOF and would not preclude access to oil and gas resources within the IOF, the Project would not result in the loss of a regionally or locally important mineral resources. Therefore, since the Project would preserve the existing oil and gas resources on the City’s portion of the IOF, the Project would not contribute to a cumulatively considerable impact related to the loss of availability of mineral resources.

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4.12 Noise

4.12.1 Introduction

This section provides an analysis of the potential local and regional environmental noise impacts from future development allowed under the Project, including potential impacts related to ambient noise levels, groundborne vibration and noise, and exposing workers and residents to excessive noise levels. The section provides context regarding characteristics and physiological effects of noise; characteristics of groundborne vibration; and the Planning Area's noise and vibration sources, as well as relevant federal, State, and local regulations and programs.

4.12.2 Environmental Setting

Noise Basics

Key Terms and Concepts

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses the propagation and control of sound primarily.¹

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the theoretical threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling and pain, respectively. Pressure waves traveling through air exert a force registered by the human ear as sound.²

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude. When all the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequency spanning 20 to 20,000 Hz. The typical human ear is not equally sensitive to sound within this frequency range. Therefore, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting

¹ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

² M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.³

An individual's noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time, as presented in **Figure 4.12-1, Decibel Scale and Common Noise Sources**. However, noise levels rarely persist at that level over a long period of time. Rather, community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many of the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.⁴

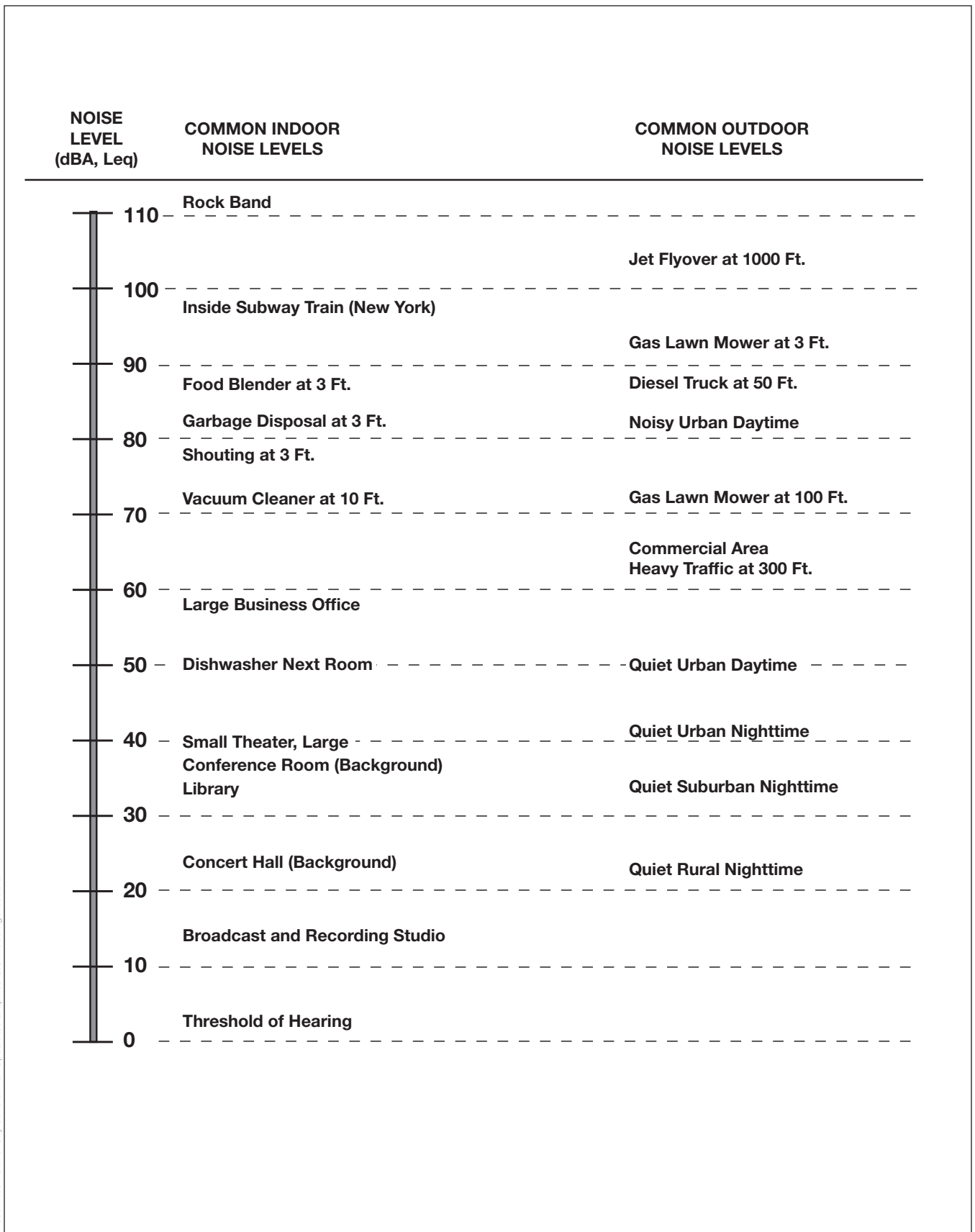
These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project.⁵

- L_{eq} : The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.
- L_{max} : The maximum, instantaneous noise level experienced during a given period of time.
- L_{min} : The minimum, instantaneous noise level experienced during a given period of time.
- L_x : The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.
- L_{dn} : The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).
- CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dB to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

³ M. David Egan, Architectural Acoustics, Chapter 1, March 1988.

⁴ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2.1, 2013.

⁵ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2.1, 2013.



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SOURCE: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: [http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf](http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf)

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Figure 4.12-1
Decibel Scale and Common Noise Sources



Effects of Noise on People

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Activities most affected by noise include rest, relaxation, recreation, study, and communications.⁶

Concerning the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. Regarding increases in A-weighted noise level, the following relationships generally occur:⁷

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a three dBA change in ambient noise levels is considered to be a barely perceivable difference;
- A change in ambient noise levels of five dBA is considered to be a readily perceivable difference; and
- A change in ambient noise levels of 10 dBA is subjectively heard as a doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion, which is why the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion. Under the dBA scale, a doubling of sound energy corresponds to a three dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately three dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately five dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.⁸

⁶ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

⁷ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

⁸ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

Sources of Noise

Sources of noise in Culver City include vehicular traffic on local streets, major arterial, freeways/highways, passenger and freight trains on railroad tracks, and aircraft overflight from neighboring airports, which include Los Angeles International Airport (LAX) located approximately two miles to the southwest and Santa Monica Airport located approximately two miles north of the western part of Culver City. In addition, noise sources include exterior operations associated with commercial and industrial land uses, such as loading/unloading activity, trash compactors, heavy-duty truck movement, trash collection, barking dogs, and amplified sound. Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in Figure 4.12-1. All noise levels presented are A-weighted unless otherwise stated. A more detailed discussion on the noise sources and their potential impacts to the existing environment is provided in Section 4.12-4, *Existing Noise Environment*, below.

Noise Attenuation

When noise spreads over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as “spherical spreading.” Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically “hard” sites and 7.5 dBA for “soft” sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 at 100 feet, 68 dBA at 200 feet, etc.). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).⁹

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as “line” sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as “cylindrical spreading.”¹⁰ Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.¹¹ Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can

⁹ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

¹⁰ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

¹¹ M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

increase sound levels at long distances (e.g., more than 500 feet). Other factors, such as air temperature, humidity, and turbulence can also have significant effects on noise levels.¹²

Vibration

Fundamentals of Vibration

As described in the Federal Transit Administration's (FTA's) Transit Noise and Vibration Impact Assessment Manual,¹³ groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. In contrast to airborne noise, groundborne vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to six times greater than RMS vibration velocity.¹⁴ Typically, groundborne vibration generated by human-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include structures (especially older masonry structures), people (especially residents, students, the elderly, and the sick), and vibration-sensitive equipment.¹⁵

In residential areas, the background vibration velocity level is usually around 50 VdB (approximately 0.0013 in/sec PPV). This level is well below the vibration velocity level threshold of perception for humans, which is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people.¹⁶

Effects of Vibration

Building vibration may be perceived by the occupants as the motion of building surfaces, the rattling of items moving on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings that are radiating sound waves. The effects of groundborne vibration include movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. However, building damage is not a factor for

¹² M. David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

¹³ FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

¹⁴ FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

¹⁵ FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

¹⁶ FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

most projects, except for occasional blasting and pile driving during construction. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. The FTA measure of the threshold of architectural damage for conventional sensitive structures is 0.2 inches per second (in/sec) PPV.¹⁷

Sources of Vibration

Typical sources of groundborne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earth-moving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with groundborne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of groundborne vibration causing interference out to distances greater than 200 feet.¹⁸ When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible.

Vibration Attenuation

Vibration attenuates by 9 VdB with the doubling of distance. For example, a vibration level at 50 feet from the source is 9 VdB lower than the vibration level at 25 feet. Vibration at 100 feet from the source is 18 VdB lower than the vibration level at 25 feet. Therefore, for a large bulldozer with a reference groundborne vibration level of 87 VdB at 25 feet, receptors at 50 feet from the construction activity may be exposed to groundborne vibration up to 78 VdB (or 0.030 inch/sec PPV or lower). Receptors at 100 feet from the source may be exposed to groundborne vibration up to 69 VdB.

4.12.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

The United States Noise Control Act of 1972

The Noise Control Act recognized the role of the federal government in dealing with major commercial noise sources in order to provide for uniform treatment of such sources. As Congress has the authority to regulate interstate and foreign commerce, regulation of noise generated by such commerce also falls under congressional authority. The federal government specifically preempts local control of noise emissions from aircraft, railroad and interstate highways.

The United States Environmental Protection Agency (USEPA) has identified acceptable noise levels for various land uses, in order to protect public welfare, allowing for an adequate margin of safety, in addition to establishing noise emission standards for interstate commerce activities.

¹⁷ FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

¹⁸ FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

The U.S. Department of Housing and Urban Development (HUD) has established policies for granting financial support for the construction of dwelling units in noise impacted areas. **Table 4.12-1, HUD External Noise Exposure Standards for New Residential Construction,** shows noise exposure levels used by HUD to determine eligibility for financial backing for new or rehabilitative residential construction in noise impacted areas, in addition to providing special requirements. As indicated in Table 4.12-1, financial assistance from HUD would still be possible when noise exposure is between 65 dBA and 75 dBA, if adequate sound attenuation is provided to achieve appropriate noise reduction.

**TABLE 4.12-1
 HUD EXTERNAL NOISE EXPOSURE STANDARDS FOR NEW RESIDENTIAL CONSTRUCTION**

HUD Approval	Site Noise Exposure	Noise Level (L _{dn})	Special Approval/Requirement
Standard	Acceptable	Not exceeding 65 dB	None
Discouraged	Normally Acceptable	65 dB to 75 dB	Building sound attenuation of 5 dB for 65-70 dB noise level and 10 dB for 70-75 dB noise level Special Environmental Clearance Approval of Regional Administration
Prohibited	Unacceptable	75+ dB	Approval of Assistant Secretary of Community Planning EIS required

SOURCE: United States Department of Housing and Urban Development, 1979. External Noise Exposure Standards for New Residential Construction July 12, 1979, as amended at 50 FR 9268, March 7, 1985.

Federal Transportation Administration Vibration Standards

There are no federal vibration standards or regulations adopted by any agency specifically for evaluating vibration impacts from land use development projects such as those that would be allowed under the Project. However, FTA has adopted vibration criteria that are commonly used to evaluate potential structural damage to buildings by building category from construction activities. The vibration damage criteria adopted by FTA are shown in **Table 4.12-2, Construction Vibration Damage Criteria.**

**TABLE 4.12-2
 CONSTRUCTION VIBRATION DAMAGE CRITERIA**

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

NOTES: PPV = peak particle velocity; in/sec = inches per second

SOURCE: Federal Transit Administration, 2018. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed March 2023.

FTA has also adopted vibration criteria associated with the potential for human annoyance from groundborne vibration for the following three land use categories: Category 1 – High Sensitivity, Category 2 – Residential, and Category 3 – Institutional. FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, historic buildings, hospitals with vibration-sensitive equipment, and university research operations. Vibration sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, libraries, theaters, churches, cemeteries, monuments, museums, campgrounds, and recreational facilities that do not have vibration-sensitive equipment but still have the potential for activity interference. The FTA uses a screening distance of 100 feet for highly vibration-sensitive buildings (e.g., historic buildings, hospital with vibration sensitive equipment, Category 1) and 50 feet for residential uses (Category 2) and institutional land uses with primarily daytime use (Category 3). The vibration criteria associated with human annoyance for these three land-use categories are shown in **Table 4.12-3, Indoor Groundborne Vibration Impact Criteria for General Assessment**. No vibration criteria have been adopted or recommended by FTA for commercial and office uses.

**TABLE 4.12-3
INDOOR GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT**

Land Use Category	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime uses.	75 VdB	78 VdB	83 VdB

NOTES: VdB = vibration velocity decibels

¹ "Frequent Events" is defined as more than 70 vibration events of the same source per day.

² "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

³ "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day.

⁴ This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 United States Code [USC] Sections 1919 et seq.), the Occupational Safety and Health Administration (OSHA) adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.¹⁹

¹⁹ United States Department of Labor, 1970. *Occupational Safety and Health (OSH) Act of 1970*, <https://www.osha.gov/laws-regs/oshact/completeoshact>. Accessed March 2023.

State

State of California Noise Standards

The Office of Noise Control in the State Department of Health Services developed criteria and guidelines for local governments to use when setting standards for human exposure to noise and preparing noise elements for General Plans. These guidelines include noise exposure levels for both exterior and interior environments. In addition, Title 25, Section 1092 of the California Code of Regulations sets forth requirements for the insulation of multiple-family residential dwelling units from excessive and potentially harmful noise. The State indicates that locating residential units in areas where exterior ambient noise levels exceed 65 CNEL is undesirable. Whenever such units are to be located in such areas, the developer must incorporate construction features into the building design that would reduce interior noise levels to 45 dBA CNEL. **Table 4.12-4, Noise and Land Use Compatibility Matrix**, and **Table 4.12-5, State Interior and Exterior Noise Standards**, summarize standards adopted by State agencies. Table 4.12-4 presents criteria used to assess the compatibility of proposed land uses with the noise environment. These standards and criteria have been incorporated into the land use planning process, including the proposed General Plan 2045 Noise Element, to reduce future noise and land use incompatibilities. These tables are the primary tools that allow Culver City to ensure integrated planning for compatibility between land uses and outdoor noise.

**TABLE 4.12-4
NOISE AND LAND USE COMPATIBILITY MATRIX**

Land Use	Community Noise Exposure L _{dn} or CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density	50 to 60	60 to 70	70 to 75	75 to 85
Residential – Multiple Family	50 to 65	65 to 70	70 to 75	75 to 85
Transient Lodging—Motels, Hotels	50 to 65	65 to 70	70 to 80	80 to 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 60	60 to 65	65 to 80	80 to 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 to 70	NA	70 to 85
Sports Arena, Outdoor Spectator Sports	NA	50 to 75	NA	75 to 85
Playgrounds, Neighborhood Parks	50 to 67.5	NA	70 to 80	75 to 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	NA	70 to 80	80 to 85
Office Buildings, Business and Professional Commercial	50 to 67.5	67.5 to 77.5	77.5 to 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 to 70	70 to 80	80 to 85	NA

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is conducted and necessary noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be conducted and necessary noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

NA: Not Applicable

SOURCE: Modified from California Office of Planning and Research, n.d. Guidelines for the Preparation and Content of the Noise Element of the General Plan.

**TABLE 4.12-5
STATE INTERIOR AND EXTERIOR NOISE STANDARDS**

Land Use Categories		CNEL dBA	
Categories	Uses	Interior ¹	Exterior ²
Residential	Single-Family, Duplex, Multiple-Family	45 ³	65
	Mobile Home	--	65 ⁴
Commercial	Hotel, Motel, Transient Lodging	45	--
Industrial	Commercial Retail, Bank, Restaurant	55	--
Institutional	Office Building, Research and Development, Professional Offices, City Office Building	50	--
	Amphitheater, Concert Hall, Auditorium, Meeting Hall	45	--
	Gymnasium (Multipurpose)	50	--
	Sports Club	55	--
	Manufacturing, Warehousing, Wholesale, Utilities	65	--
	Movie Theaters	45	--
	Hospital, Schools' Classrooms/Playgrounds	45	65
Open Space	Church, Library	45	--
	Parks	--	65

¹ Indoor environmental including: Bathrooms, closets, and corridors.

² Outdoor environment limited to

- Private yard of single family, multi-family private patio or balcony which is served by a means of exit from inside the dwelling
- Balconies 6 feet deep or less are exempt
- Mobile home park
- Park's picnic area
- School's playground

³ Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 23, Section 1206 of UBC.

⁴ Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.

SOURCE: Modified from California Department of Health Services, Office of Noise Control.

In addition, new or renovated residential and business buildings in California are required to comply with the California Code of Regulations, Title 24, Part 2 – California Building Code, Chapter 12 – Interior Environment, which requires that interior noise levels attributable to exterior sources must not exceed 45 dB CNEL in any habitable room.

Assembly Bill 1307

On September 7, 2023, the Governor signed Assembly Bill (AB) 1307, which provides that noise generated by occupants of residential projects is not a significant effect on the environment under the California Environmental Quality Act (CEQA). AB 1307 also eliminates the requirement that public universities consider alternatives to the location of housing projects when the project is located on a site no bigger than five acres in an urban use setting, and has already been evaluated in an environmental impact report for the university's long-range development plan. The State Legislature unanimously passed the bill, which takes immediate effect as an urgency statute to address California's housing crisis. Under AB 1307, the effects of noise generated by project occupants and their guests on human beings shall not be considered a

significant effect on the environment under CEQA if a project is categorized within one of the following definitions as outlined in Section 21085.2 of AB 1307:²⁰

- 1) “Long-range development plan” means a physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education.
- 2) “Public higher education” means the institutions described in subdivision (a) of Section 66010 of the Education Code.
- 3) “Residential or mixed-use housing project” means a project consisting of residential uses only or a mix of residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential uses.
- 4) “Substantially surrounded” means at least 75 percent of the perimeter of the project site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- 5) Notwithstanding any other law or regulation, institutions of public higher education shall not be required, in an environmental impact report prepared for a residential or mixed-use housing project, to consider alternatives to the location of the residential or mixed-use housing project if both of the following requirements are met:
 - a) The residential or mixed-use housing project is located on a site that is no more than five acres and is substantially surrounded by qualified urban uses.
 - b) The residential or mixed-use housing project has already been evaluated in the environmental impact report for the most recent long-range development plan for the applicable campus.

Local

Culver City Municipal Code

Chapter 9.07 of the City of Culver City Municipal Code (CCMC) provides specific noise restrictions and exemptions for noise sources within the City. Section 9.07.035 of the CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours. This section also prohibits any person to operate any radio, disc player or cassette player or similar device at a construction site in a manner that results in noise levels that are audible beyond the construction site property line. Construction activity of a specific nature (such as the pouring of concrete) may be authorized during the prohibited times, provided such exception has been determined to be in the public interest and a land use permit or a temporary use permit has been issued in accordance with the requirements.

Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing

²⁰ California Legislative Information, Assembly Bill No. 1307. September 7, 2023. Available at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB1307. Accessed October 2023.

entertainment on an ongoing basis which is audible at the subject property line. This section is applicable only to uses that would include regular and ongoing amplification, such as outdoor speakers used for a drive-through restaurant.

Section 9.07.060 of the CCMC provides certain exemptions from Chapter 9.07 including noise for the purpose of alerting persons to the existence of an emergency or performance of emergency work, noise from warning devices necessary for the protection of public safety, permitted activities conducted on public playgrounds and public or private school grounds including but not limited to school athletic and entertainment events, trash collection activities in residential areas after 7:00 a.m., public utilities operating under the authority of the Public Utilities Commission when specifically authorized through the City's permit system, and filming activity conducted in accordance with the provisions of Chapter 11.14, which provides specific requirements for filming activity.

4.12.4 Existing Noise Environment

Ambient Noise

Culver City is in an area of southern California that is characterized by several types of regional noise sources, such as freeways and airports. These sources generate noise that can be heard in noise-sensitive areas throughout many areas of the City. Three major freeways border the city. The Marina (SR-90) Freeway is in the southwest area of the city and ends at Slauson Avenue. The San Diego (I-405) Freeway runs through the western half of the city. The Santa Monica (I-10) Freeway runs adjacent to the northern city limits. Unlike the other two freeways, the I-10 does not enter the City. However, I-10 noise does affect Culver City because of its proximity to the northern city limits.

The City is located within a few miles of two busy southland airports. LAX, the busiest airport in southern California, is located approximately two miles to the southwest. Santa Monica Airport, a municipal general aviation airport, is located approximately two miles north of the western part of Culver City. As a result, the City is subject to a variety of aircraft and helicopter noise events. Aircraft operations, though infrequent, may generate high noise levels that can be disruptive to human activity. The City is not within the aircraft noise exposure area or 65 dBA CNEL noise contour of LAX. However, Culver City is in the flight path for landings at LAX, when planes are coming from the north and the west, crossing over certain parts of Santa Monica and other areas of the Westside, flying through Culver City, as the planes head further east before turning around to make their final descent into LAX. Therefore, aircraft overflight from LAX operations contributes to the ambient noise level in the city.

In addition, the Los Angeles Metro Rail E Line (Expo) passes through the City in an east-west orientation. The Metro E Line's Culver City Station is located just east of the intersection of Venice Boulevard and S. Robertson Boulevard.

Noise that falls into the stationary source category typically includes industrial and commercial, entertainment, sporting or other outdoor events including those at educational institutions, construction and maintenance, machinery, and passenger and delivery vehicle noise. Passenger

and delivery vehicle noise is included with the stationary sources because the noise occurs at certain sites where the activity is generated. In Culver City, these sources include business centers, such as Fox Hills Mall and Studio Village Shopping Center; employment centers that range in size from major movie studios, such as Sony Pictures Studios; small industrial operations, such as Westside Business Park; and institutional sources, such as West Los Angeles Community College and Culver City High School. The types of noise disturbance from stationary source activities can range from short-duration events, such as trucks accessing a facility, to continuous noise from mechanical sources, such as refrigeration units or compressors. Many of the smaller operations are located in strip-commercial zones along Washington and Sepulveda Boulevards adjacent to residential land use. The types of noise disturbance from stationary source activities can range from short-duration, loud events, such as trucks accessing a facility, to continuous noise from mechanical sources, such as refrigeration units or compressors.

To understand the existing ambient or background noise levels throughout the city, long-term (24-hour) and short-term (15-minute) field measurements were conducted in October 2019. The noise measurements consider mobile noise sources and stationary noise sources. Field monitoring consisted of 32 noise measurements recorded at various locations throughout the city. The noise measurements were conducted using a Larson Davis LxT Type 1 sound-level meter (SLM). All instruments were calibrated and operated according to the applicable manufacturer specification. A summary of long-term noise measurements is shown in **Table 4.12-6, Summary of Short-Term Noise Measurements**. The results of the short-term noise measurements are shown in **Table 4.12-7, Summary of Long-Term Noise Measurements**. The measurement locations are identified in **Figure 4.12-2, Noise Measurement Locations**.

Traffic Noise

Transportation-related noise sources include freeways, aircraft overflights, major and minor arterial roadways, and rail lines. These include noise from automobiles, trucks, motorcycles, trains, and aircraft. Motor vehicle noise is of concern because it is characterized by a high number of individual events that often combine to create a sustained noise level, and because of its proximity to areas sensitive to noise exposure.

Culver City is located in an area of southern California that is saturated by regional noise sources, such as freeways and airports. These sources generate noise that can be heard in noise sensitive areas throughout many areas of the city. As discussed previously, The Marina (SR-90) Freeway is located in the southwest area of the city, The San Diego (I-405) Freeway runs through the western half of the city, and the Santa Monica (I-10) Freeway runs adjacent to the northern city limits.

The following major roadways pass through the city's boundary and constitute major arterials within the city limits: Venice Boulevard, Washington Boulevard, Culver Boulevard, Jefferson Boulevard, National Boulevard, Slauson Avenue, Duquesne Avenue, Short Avenue, Centinela Avenue, Sawtelle Boulevard, Overland Avenue, La Cienega Boulevard, Sepulveda Boulevard, Inglewood Boulevard, and Barrington Avenue.

**TABLE 4.12-6
SUMMARY OF SHORT-TERM NOISE MEASUREMENTS**

Site	General Location of Noise Measurement	dBA Leq^a	Orientation/Type of Sensitive Receptor
R1	Grand View Boulevard between Washington Place and Herbert Street	58.6	Multi-family residential to the east, single-family residential to the southeast, and commercial to the west
R2	Emporia Place at junction of Emporia Avenue and Selmaraine Drive	58.8	Single-family to the north, west, and northwest. I-405 and SR-90 interchange to the east
R3	Midway Avenue between Venice Boulevard and Washington Boulevard	62.2	Single-family residential to the west and south. Commercial center to the north and east
R4	Near the corner of Drakewood Avenue and Flaxton Street	46.2	Surrounded by single-family residential
R5	Braddock Drive just north of Sepulveda Boulevard	63.4	Single-family residential to the north, commercial uses to the south, east, and west
R6	Along Watseka Avenue near alleyway connecting Watseka Avenue and Cardiff Avenue	62.4	Multi-family residential to the west and commercial uses to the north, south, and east
R7	Higuera Street between Krueger Street and Hubbard Street	67.0	Surrounded by single-family residential
R8	Lincoln Avenue near cul-de-sac above Ballona Creek	51.9	Single-family residential to the north, west, and south
R9	Roberts Avenue across from Washington School	65.0	Single-family residential, open space, and Washington School
R10	Near corner of Elenda Street and Marietta Avenue	66.0	Surrounded by single-family residential
R11	Coombs Avenue across from Veterans Memorial Park	63.9	Veterans memorial Park to the north. Single-family residential to the south, east, and west
R12	Blackwelder Street west of La Cienega Boulevard	65.4	Light Industrial and commercial uses
R13	Near corner of Orville Street and McDonald Street	45.6	Single-family residential to the south, east, and west. Ballona Creek to the north
R14	Near corner of McDonald Street and Purdue Avenue	56.9	Single-family residences to the east, north, and south. Freeway overpass to the west
R15	Near corner of Buckingham Parkway and Windsor Way	61.9	Multi-family residences to the north, east, and south. Commercial center to the west
R16	At the terminus of Jasmine Avenue west of Le Bourget Avenue	49.9	Single-family residences to the north, east, and south. Multi-family residences to the west
R17	Walgrove Avenue between Zanja Street and Washington Boulevard	60.4	Surrounded by single-family residential. One block from Costco
R18	Globe Avenue near vacant lot west of I-405	61.1	Single-family residences to the west and northwest. I-405 overpass to the east.
R19	Near corner of Hannum Avenue and Bush Way	55.8	Surrounded by single-family residential. Commercial corridor on Sepulveda Boulevard to the west
R20	Near Corner of Huron Avenue and Matteson Avenue	59.8	Surrounded by single-family residential
R21	Jasmine Avenue near Culver Boulevard	58.5	Single- and multi-family residences to the south and east. Commercial uses to the north and east
R22	Near corner of Washington Boulevard and Mildred Avenue	65.1	Single-family residences to the south. Commercial uses to the east, west, and north
R29	Hannum Avenue near entrance to Playa Pacific community	70.2	Multi-family residences to the north, east, and south. Commercial center to the west

Site	General Location of Noise Measurement	dBA Leq ^a	Orientation/Type of Sensitive Receptor
R30	Van Buren Place across from Linwood E. Howe Elementary School	56.4	Linwood E. Howe Elementary School to the west and single-/multi-family residences to the northwest, south, and east
R31	Near corner of Washington Boulevard and National Boulevard	70.1	Multi-family residences to the east and light industrial/commercial uses to the north, south, and west
R32	Near corner of Hayden Avenue and Warner Drive	61.0	Light industrial/commercial uses

^a Detailed measured noise data, including hourly Leq levels, are included in Appendix E.

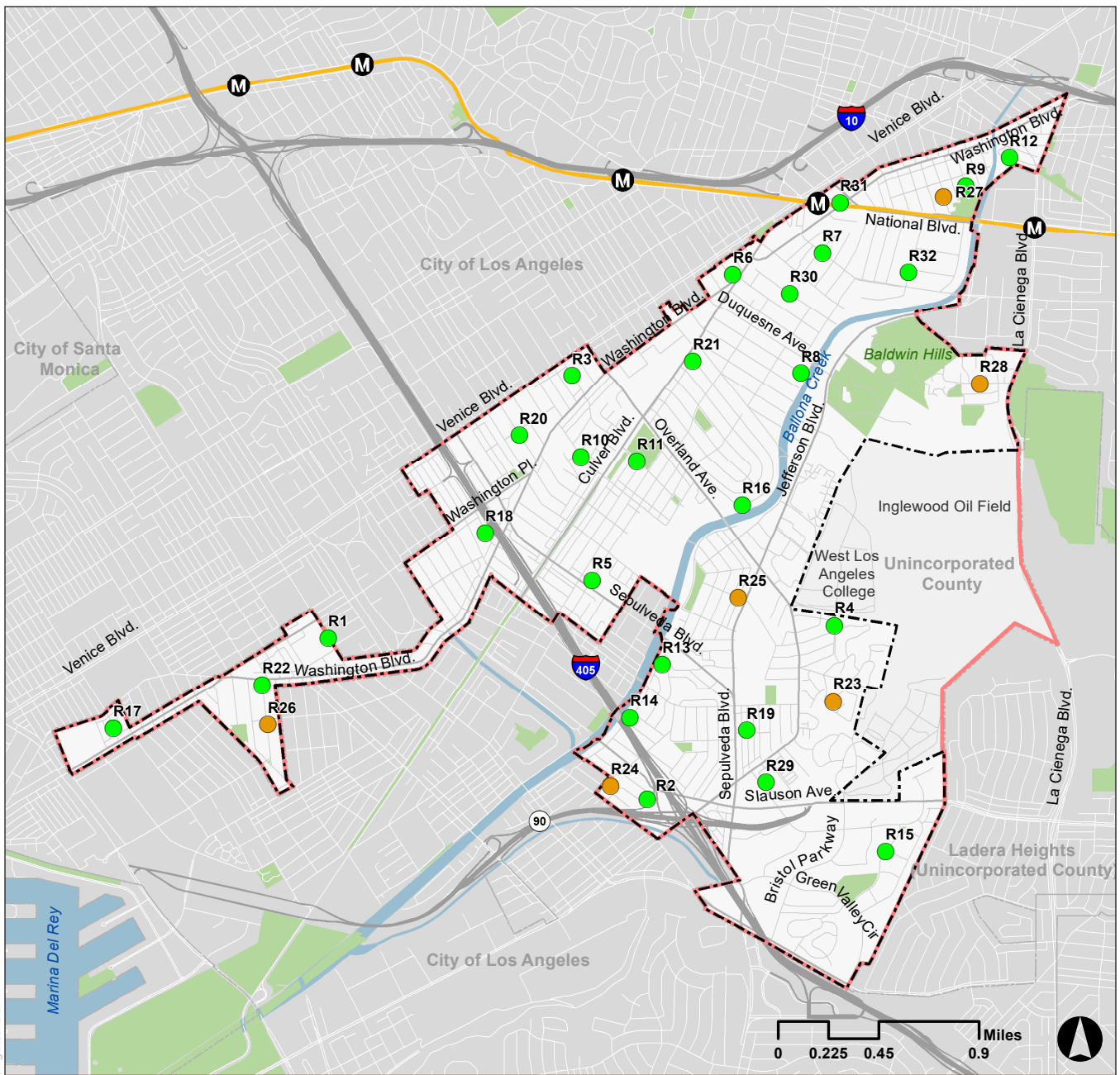
SOURCE: ESA, 2019.











**TABLE 4.12-7
SUMMARY OF LONG-TERM NOISE MEASUREMENTS**

Site	General Location of Noise Measurement	Leq dBA ^a				CNEL dBA	Orientation/Type of Sensitive Receptor
		Daytime (7 A.M. to 10 P.M.) Hourly Leq	Daytime Average Hourly Leq	Nighttime (10 P.M. to 7 A.M.) Hourly Leq	Nighttime Average Hourly Leq		
R23	Near northeast corner of Tellefson Road and Cranks Road	46.2 - 60.9	53.8	43.6 - 64.3	56.0	62.2	Single-family residential uses in every direction
R24	Near northeast corner of Port Road and Emporia Avenue	56.7 - 61.5	59.9	56.9 - 64.1	60.4	66.9	Single-family residential uses in every direction
R25	Near southeast corner of Pickford Way and Kinston Avenue	52.8 - 68.1	60.3	47.0 - 57.9	52.6	61.6	Single-family residential uses in every direction. Shopping center across Jefferson Boulevard to the east
R26	Near southeast corner of Mildred Avenue and Louise Avenue	54.2 - 69.3	62.3	43.2 - 65.5	56.8	64.7	Single-family residential uses in every direction
R27	Halfway down Fay Avenue south of Jacob Street	55.3 - 61.7	58.5	49.7 - 61.3	56.6	63.6	Single-family residential uses in every direction. Syd Kronenthal Park to the east.
R28	Near southwest corner of Wrightcrest Drive and Lenawee Avenue	55.7 - 63.3	59.7	50.4 - 65.0	57.7	64.7	Single- and multi-family residential uses in every direction

^a Detailed measured noise data, including hourly Leq levels, are included in Appendix E.

SOURCE: ESA, 2019.



- | | | | | |
|-------------------------------------------------------------------------------------|----------------------|------------------------------------|-------------------------------------------------------------------------------------|----------------------------------|
|  | City Limits | Noise Measurement Locations |  | Short Term Measurement Locations |
|  | Sphere of Influence | |  | Long Term Measurement Locations |
|  | Metro Station | | | |
|  | E Line (Expo) | | | |
|  | Major Roads | | | |
|  | Local Roads | | | |
|  | Parks and Open Space | | | |
|  | Waterbody | | | |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

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Figure 4.12-2
Noise Measurement Locations



Existing roadway noise levels were calculated for 62 roadway segments located in the city, using the Federal Highway Administration (FHWA) Highway Traffic Noise Model (TNM) methodology and data for existing vehicle miles traveled (VMT) and traffic volumes for non-truck vehicles and light-duty, medium-duty, and heavy-duty trucks on study roadway segments from the Culver City Citywide Travel Demand Forecasting Model (see Appendix F2 of this Draft PEIR for traffic data). The FHWA TNM methodology calculates the average noise level at specified locations based on traffic volumes, average speeds, and site environmental conditions.

The model assumed “hard surface” site propagation conditions. As previously discussed, sound levels caused by line sources, such as roadway segment traffic, decrease at a rate of 3.0 to 4.5 dBA when the distance from the centerline of the road is doubled, depending on the surface hardness between the source and the receiving property. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography. Attenuation due to intervening structures, topography, atmospheric absorption, etc. is not included in the generalized model; therefore, the model analysis assumes a conservative worst-case scenario for traffic noise (i.e., actual site attenuation would potentially result in reduced traffic noise levels at receptors, where intervening structures and topography occur).

The average daily noise levels along these roadway segments at 50 feet from the roadway centerline, and the line-of-sight distance from the roadway segment to the noise contours of 70, 65, and 60 dBA CNEL are presented in **Table 4.12-8, Existing Roadway Noise Levels**. Existing roadway noise contours are shown in **Figure 4.12-3, Existing Roadway Noise Contour Map**. A noise contour is a line behind which the noise level does not exceed a certain value. For instance, the 60 dBA CNEL contour indicates that the CNEL between the roadway centerline and the contour line is equal to, or greater than 60 dBA; the CNEL beyond the contour line – away from the street – is less than 60 dBA CNEL.

**TABLE 4.12-8
 EXISTING ROADWAY NOISE LEVELS**

Roadway Segment	dBA CNEL at 50 Feet from Centerline ¹	Approximate Distance to CNEL Contour (feet) ²		
		60	65	70
Adams Blvd between Washington Blvd & Fairfax Ave	64.8	150	45	15
Culver Blvd between Overland Ave & Sepulveda Blvd	72.7	935	295	95
Culver Blvd between Sepulveda & Sawtelle Blvd	72.5	895	280	90
Culver Blvd between Washington Blvd & Duquesne Ave	69.1	405	130	40
Culver Blvd between Washington Blvd & Washington Blvd	70.9	620	195	60
Culver Blvd between Duquesne Ave & Overland Ave	72.6	905	285	90
Fairfax Ave between Washington Blvd & La Cienega Blvd	72.6	910	290	90
Jefferson Blvd between Slauson Ave & Inglewood Blvd	71.4	690	220	70
Jefferson Blvd between Sepulveda Blvd & Slauson Ave	69.5	450	140	45
Jefferson Blvd between Overland Ave & Sepulveda Blvd	70.8	605	190	60
Jefferson Blvd between Duquesne Ave & Overland Ave	73.4	1,095	345	110
Jefferson Blvd between Overland Ave & Sawtelle Blvd	66.3	215	70	20

Roadway Segment	dBA CNEL at 50 Feet from Centerline ¹	Approximate Distance to CNEL Contour (feet) ²		
		60	65	70
Jefferson Blvd between Obama Blvd & Duquesne Ave	73.4	1,105	350	110
Machado Rd between Jefferson Blvd & Sepulveda Blvd	62.9	95	30	10
Overland Ave between Venice Blvd & Washington Blvd	69.5	445	140	45
Overland Ave between Washington Blvd & Culver Blvd	69.8	475	150	45
Overland Ave between Culver Blvd & Jefferson Blvd	69.4	430	135	45
Overland Ave between Jefferson Blvd & Sawtelle Blvd	69.7	465	150	45
S Centinela Ave between Washington Blvd & Culver Blvd	69.2	415	130	40
S Centinela Ave between Venice Blvd & Washington PI	72.7	930	295	95
S Centinela Ave between Washington PI & W Washington Blvd	71.1	650	205	65
S Fairfax Ave between Venice Blvd & Washington Blvd	70.0	500	160	50
S La Cienega Blvd between Fairfax Ave & W Jefferson Blvd	72.6	905	285	90
S La Cienega Blvd between Venice Blvd & Washington Blvd	70.9	610	195	60
S La Cienega Blvd between Washington Blvd & Fairfax Ave	72.7	935	295	95
Sepulveda Blvd between Slauson Ave & W Centinela Ave	72.0	795	250	80
Sepulveda Blvd between Culver Blvd & Jefferson Blvd	72.0	785	250	80
Sepulveda Blvd between Washington Blvd & Culver Blvd	70.0	500	160	50
Sepulveda Blvd between Venice Blvd & Washington PI	71.4	695	220	70
Sepulveda Blvd between Washington PI & Washington Blvd	70.9	615	195	60
Sepulveda Blvd between Jefferson Blvd & Slauson Ave	73.1	1,020	325	100
Sepulveda Blvd between Sawtelle Blvd & Jefferson Blvd	75.5	1,770	560	175
Sepulveda Blvd between Jefferson Blvd & Sawtelle Blvd	71.8	765	240	75
Slauson Ave between Jefferson Blvd & Sepulveda Blvd	68.8	380	120	40
Slauson Ave between W Jefferson Blvd & Washington Blvd	62.6	90	30	10
Venice Blvd between Sepulveda Blvd and Sawtelle Blvd	69.8	480	150	50
Venice Blvd between Overland Ave and Sepulveda Blvd	70.1	515	160	50
W Centinela Ave between Sepulveda Blvd & Green Valley Cir	72.3	840	265	85
W Centinela Ave between Jefferson Blvd & Sepulveda Blvd	76.1	2,045	645	205
W Jefferson Blvd between National Blvd & Obama Blvd	70.8	605	190	60
W Jefferson Blvd between Obama Blvd & Duquesne Ave	73.4	1,105	350	110
Washington Blvd between Overland Ave & Washington PI	70.9	610	190	60
Washington Blvd between Duquesne Ave & Overland Ave	69.2	410	130	40
Washington Blvd between Washington PI & Sepulveda Blvd	66.5	225	70	20
Washington Blvd between Culver Blvd & Duquesne Ave	67.6	285	90	30
Washington Blvd between Washington PI & Lincoln Blvd	68.3	340	110	35
Washington Blvd between Inglewood Blvd & S Centinela Ave	69.0	395	125	40
Washington Blvd between Sawtelle Blvd & Inglewood Blvd	68.8	380	120	40
Washington Blvd between S Centinela Ave & W Washington Blvd	67.4	280	90	30
Washington Blvd between Sepulveda Blvd & Sawtelle Blvd	68.4	345	110	35
Washington Blvd between La Cienega Blvd & National Blvd	71.6	715	225	70
Washington Blvd between National Blvd & Culver Blvd	70.7	585	185	60
Washington Blvd between Fairfax Ave & La Cienega Blvd	71.3	670	210	65

Roadway Segment	dBA CNEL at 50 Feet from Centerline ¹	Approximate Distance to CNEL Contour (feet) ²		
		60	65	70
Washington Blvd between S Centinela Ave & Washington Pl	68.5	355	115	35
Washington Blvd between Duquesne Ave & Overland Dr	69.1	405	130	40
Washington Blvd between National Blvd & Overland Ave	70.6	575	180	55
Washington Blvd between Overland Ave & Sepulveda Blvd	70.7	590	185	60
Washington Pl between Washington Blvd & Sepulveda Blvd	69.2	415	130	40
Washington Pl between Inglewood Blvd & S Centinela Ave	70.4	550	175	55
Washington Pl between S Centinela Ave & W Washington Blvd	70.2	530	165	55
Washington Pl between Washington Blvd & Washington Blvd	70.8	605	190	60
Washington Pl between Sepulveda Blvd & Sawtelle Blvd	69.7	465	150	45

¹ CNEL values are calculated at 50 feet from the roadway centerline.

² All distances are measured from the centerline.

SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT and traffic volume data).

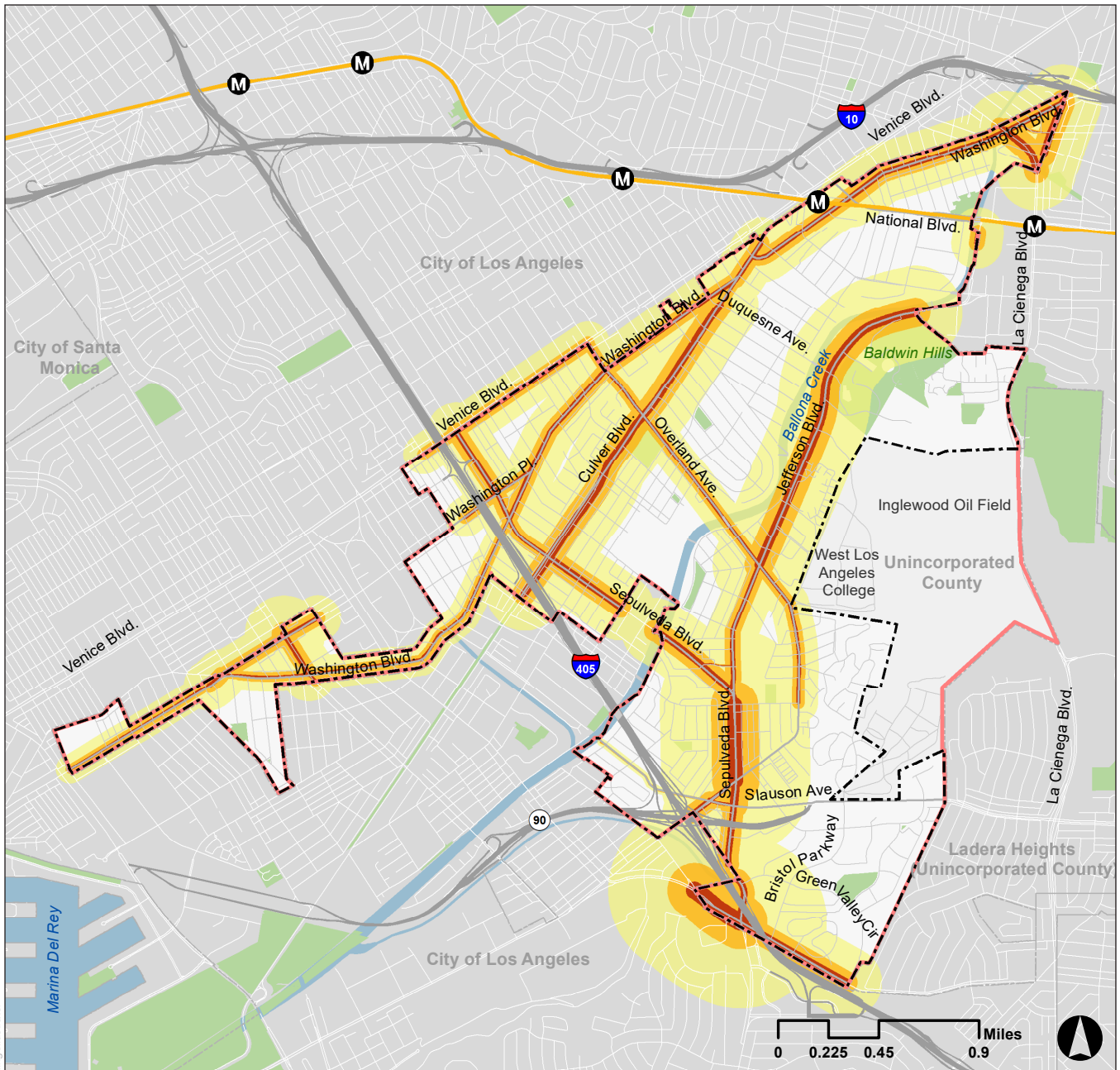
60 dBA CNEL Contour












The 60 dBA CNEL contour defines the noise study zone. The noise environment for any proposed noise-sensitive land use (for example, single- or multi-family residences, hospitals, schools, or churches) within this zone should be evaluated on a project-specific basis. The project may require mitigation to meet city and/or state (Title 24) standards. A site- and project-specific study will be necessary to determine mitigation measures that will help make the interior building environment acceptable for the given type of land use. Some sites may already be sufficiently protected by existing walls or berms so that no further mitigation measures are required.

65 dBA CNEL Contour

The 65 dBA CNEL contour defines the noise mitigation zone. Within this contour, new or expanded noise-sensitive developments should be permitted only if appropriate mitigation measures, such as barriers or additional sound insulation, are included and City and/or state noise standards are achieved. In some instances, it may be possible to show that existing walls, berms, or screening may exist such that required noise reduction is already in place. The inclusion of an area within a 60 or 65 dBA CNEL contour as shown on Figure 4.12-3 indicates that noise levels are high enough to be of potential concern, but does not imply that excessive noise levels are uniformly present on all sites within the area. Buildings, walls, berms, and changes in topography affect noise levels at the receiver site. Some locations may be screened from roadway noise by the presence of one or more of these features.

As indicated in Table 4.12-8, the existing roadway noise levels at 50 feet along studied roadways vary from a minimum of 62.6 dBA CNEL to a maximum of 76.1 dBA CNEL. The 65 dBA CNEL contour locations vary from 30 feet (along Machado Rd between Jefferson Blvd & Sepulveda Blvd, and Slauson Ave between W Jefferson Blvd & Washington Blvd) to 645 feet (along W Centinela Ave between Jefferson Blvd & Sepulveda Blvd) from the roadway centerline. For nearly all of these roadway links, the 65 dBA CNEL contours extend beyond the edge of right-of-way (ROW).



- | | |
|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
|  City Limits | Existing Noise Levels |
|  Sphere of Influence |  70 dB Contour |
|  Metro Station |  65 dB Contour |
|  E Line (Expo) |  60 dB Contour |
|  Major Roads | |
|  Local Roads | |
|  Parks and Open Space | |
|  Waterbody | |



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

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Figure 4.12-3
Existing Roadway Noise Contour Map



70 dBA CNEL Contour

The 70 dBA CNEL contour defines the noise impact zone. Within this contour, new or expanded noise-sensitive developments are usually not permitted. The development of an area within a 70 dBA CNEL contour (as shown on Figure 4.12-3) indicates that noise levels are high enough to be of potential concern.

As indicated in Table 4.12-8, the existing roadway noise levels at 50 feet along studied roadways vary from a minimum of 62.6 dBA CNEL to a maximum of 76.1 dBA CNEL. The 70 dBA CNEL contour locations vary from 10 feet (along Machado Rd between Jefferson Blvd & Sepulveda Blvd, and Slauson Ave between W Jefferson Blvd & Washington Blvd) to 205 feet (along W Centinela Ave between Jefferson Blvd & Sepulveda Blvd) from the roadway centerline. For the majority of these roadway links, the 70 dBA CNEL contours extend beyond the edge of ROW.

Sensitive Receptors

A noise-sensitive receptor would be any location where excessive noise levels would interfere with an individual's normal sleeping activities, normal conversation, or ability to work. Some land uses are more sensitive to high noise levels than others, due to the usage of the occupants at these land uses. Such land uses include residential neighborhoods, hotels and motels, trailer parks, schools, churches and other places of worships, hospitals, long-term medical or mental care facilities, libraries, concert halls, and other land uses that include outdoor active uses with people spending a good amount of time periods in their outdoor areas.

4.12.5 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to noise if the project would result in:

- Threshold NOI-1:** Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- Threshold NOI-2:** Generation of excessive groundborne vibration or groundborne noise levels.
- Threshold NOI-3:** For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

The Initial Study (Appendix A) found no potentially significant impacts related to airport land use plans (Threshold NOI-3); therefore, this issue is not evaluated in this section. Please see Appendix A for further discussion.

Methodology

Construction Noise and Vibration

For construction-related noise from development of future projects under the General Plan and Zoning Code Update, typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, are taken from the FHWA Roadway Construction Noise Model (RCNM).²¹

Construction vibration impacts were evaluated using FTA methodology from the FTA Transit Noise and Vibration Impact Assessment Manual.²² Building or structure setback distances for preventing vibration damage were evaluated using reference vibration levels for specific construction equipment.

Traffic Noise

During operation of future projects under the General Plan and Zoning Code Update, noise generated from mobile noise sources such as vehicular traffic is assessed with the FHWA-approved traffic noise source noise modeling guidelines. For stationary sources, equipment source noise levels included in the FHWA RCNM are used for the impact analysis.²³

Railway Noise

Specific details on future railway expansions or improvements are unknown at this time, neither are the specific noise sources that might occur in conjunction with development of land uses near the railway under the Project. Therefore, railway noise and vibration impacts are discussed on a qualitative basis.

Stationary Noise

Specific details on future mechanical equipment or HVAC equipment and layout are unknown at this time, neither are the specific noise sources that might occur in conjunction with development of land uses allowable under the Project. Therefore, stationary and other noise source impacts are discussed on a qualitative basis.

Project Impacts Analysis

Temporary or Permanent Increase in Ambient Noise Levels

Threshold NOI-1: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code Update would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

²¹ FHWA, Roadway Construction Noise Model User's Guide, 2006.

²² FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

²³ FHWA, Roadway Construction Noise Model User's Guide, 2006.

Impact Statement NOI-1: The Project would result in a potentially significant impact during construction and operation of future development projects that could exceed the significance thresholds. Implementation of mitigation would help to reduce the severity of the impacts; however, impacts could still exceed the significance thresholds and impacts would be significant and unavoidable.

Construction Noise

Construction of future development under the General Plan 2045 would require the use of heavy equipment during the demolition, grading, excavation, and other construction activities within the Planning Area. During each stage of development for any given construction project, a different mix of equipment would be used. As such, construction activity noise levels would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Individual pieces of representative construction equipment types that could be expected to be used during construction activities of future projects could produce maximum noise levels of 75 dBA to 101 dBA Lmax at a reference distance of 50 feet from the noise source, as shown in **Table 4.12-9, Construction Equipment Noise Levels**. These maximum noise levels would occur when equipment is operating at full power. The estimated usage factor for the equipment is also shown in Table 4.12-9. The usage factors are based on FHWA's RCNM User's Guide.²⁴

The exact locations of future projects and construction that would occur under the proposed General Plan 2045 are not known at this time, though it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the City is generally built out. The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration and intensity of the activity. While the details of these factors are not available for future projects, it is assumed that individual projects would be implemented in compliance with the restrictions of the CCMC. Proposed General Plan 2045 Policies N-4.1, N-4.2, and N-4.4 are related to minimizing noise generated from construction activities.

In addition, for future development projects requiring discretionary approval, a project-specific noise analysis would be prepared to determine significance in accordance with CEQA. Through each environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require the implementation of mitigation measure(s). Even with mandatory compliance with Municipal Code requirements, it is possible that some future development projects requiring discretionary approval could be large in construction intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Therefore, project-related construction activities could result in a significant impact and mitigation measure(s) would be required.

²⁴ FHWA, Roadway Construction Noise Model User's Guide, 2006.

**TABLE 4.12-9
CONSTRUCTION EQUIPMENT NOISE LEVELS**

Construction Equipment	Estimated Usage Factor	Noise Level at 50 Feet (dBA Lmax)
Air Compressors	40%	78
Bore/Drill Rig	20%	79
Cement and Mortar Mixer	40%	79
Compactor	20%	83
Concrete Saw	20%	90
Crane	16%	81
Dumpers/Tenders	40%	76
Excavator	40%	81
Forklift	10%	75
Generator Sets	50%	81
Jackhammers	20%	89
Off-Highway Trucks	20%	76
Other Equipment	50%	85
Paver	50%	77
Paving Equipment	20%	90
Roller	20%	80
Rough Terrain Forklift	10%	75
Rubber Tired Loader	50%	79
Surfacing Equipment	50%	85
Tractor/Loader/Backhoe	25%	80
Vacuum Street Sweeper	10%	82
Vibratory Pile Driver	20%	101

SOURCE: FHWA, Roadway Construction Noise Model User's Guide, 2006.

Traffic Noise

Future development under the General Plan 2045 would generate traffic that would increase noise levels along existing and future roadways. Proposed General Plan 2045 Policies N-3.1, N-3.2, N-3.3, N-3.4, N-3.5, N-3.6, and N-3.7 are related to minimizing noise generated from roadway mobile sources. The FHWA TNM methodology was used to evaluate future (2045) traffic-related noise conditions in the City for 62 roadway segments located in the city, using data for future (2045) VMT and traffic volumes for non-truck vehicles and light-duty, medium-duty, and heavy-duty trucks on study roadway segments from the Culver City Citywide Travel Demand Forecasting Model (see Appendix F2 of this Draft EIR for traffic data). The FHWA TNM methodology calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions.

Table 4.12-10, Future Roadway Noise Levels, provides the future buildout noise levels at 50 feet from the centerline of these roadway segments and the distances to the 60, 65, and 70 dBA

CNEL future roadway noise contours shown in **Figure 4.12-4, Future Roadway Noise Contour Map**. As shown in Table 4.12-10, traffic noise along the analyzed roadway segments would not be discernably different for the majority of the segments when future no project levels are compared to future roadway noise levels with implementation of the General Plan 2045. The maximum increase would be 4.2 dBA (from 66.0 to 70.2 dBA CNEL) along Washington Boulevard between Inglewood Boulevard and S Centinela Avenue, which is characterized by a mix of commercial and multi-family residential uses. All other modeled segments would increase by less than 3 dBA CNEL. An increase in traffic noise levels measured at the property line of affected uses of 3 dBA CNEL or more, to or within the “normally unacceptable” or “clearly unacceptable” categories, or an increase of 5 dBA CNEL or more, within the “normally acceptable” or “conditionally acceptable,” categories is considered a significant impact. Therefore, as the traffic noise increase along Washington Boulevard between Inglewood Boulevard and S Centinela Avenue could exceed 3 dBA CNEL, to or within the “normally unacceptable” or “clearly unacceptable” categories, the impact from traffic noise would potentially significant and unavoidable.

**TABLE 4.12-10
FUTURE ROADWAY NOISE LEVELS**

Roadway Segment	Future Plus Project Distance (feet) to Centerline to			Future No Project Noise Levels	Future Plus Project Noise Levels	Increase
	60 dBA CNEL Contour	65 dBA CNEL Contour	70 dBA CNEL Contour	dBA CNEL at 50 Feet from Centerline		
Adams Blvd between Washington Blvd & Fairfax Ave	130	40	15	63.9	64.2	0.3
Culver Blvd between Overland Ave & Sepulveda Blvd	1,225	390	125	73.5	73.9	0.4
Culver Blvd between Sepulveda & Sawtelle Blvd	1,210	380	120	73.5	73.8	0.3
Culver Blvd between Washington Blvd & Duquesne Ave	575	180	60	70.3	70.6	0.3
Culver Blvd between Washington Blvd & Washington Blvd	625	195	60	70.7	71.0	0.3
Culver Blvd between Duquesne Ave & Overland Ave	1,545	490	155	74.4	74.9	0.5
Fairfax Ave between Washington Blvd & La Cienega Blvd	770	245	75	71.8	71.9	0.1
Jefferson Blvd between Slauson Ave & Inglewood Blvd	895	280	90	72.2	72.5	0.3
Jefferson Blvd between Sepulveda Blvd & Slauson Ave	195	60	20	68.4	65.9	-2.5
Jefferson Blvd between Overland Ave & Sepulveda Blvd	600	190	60	72.4	70.8	-1.6
Jefferson Blvd between Duquesne Ave & Overland Ave	790	250	80	72.9	72.0	-0.9
Jefferson Blvd between Overland Ave & Sawtelle Blvd	285	90	30	69.4	67.6	-1.8
Jefferson Blvd between Obama Blvd & Duquesne Ave	935	295	95	73.5	72.7	-0.8
Machado Rd between Jefferson Blvd & Sepulveda Blvd	90	30	10	61.6	62.5	0.9
Overland Ave between Venice Blvd & Washington Blvd	500	160	50	69.9	70.0	0.1
Overland Ave between Washington Blvd & Culver Blvd	750	235	75	71.5	71.8	0.3
Overland Ave between Culver Blvd & Jefferson Blvd	815	260	80	71.6	72.1	0.5
Overland Ave between Jefferson Blvd & Sawtelle Blvd	640	205	65	68.6	71.1	2.5
S Centinela Ave between Washington Blvd & Culver Blvd	380	120	40	70.4	68.8	-1.6

Roadway Segment	Future Plus Project Distance (feet) to Centerline to			Future No Project Noise Levels	Future Plus Project Noise Levels	Increase
	60 dBA CNEL Contour	65 dBA CNEL Contour	70 dBA CNEL Contour	dBA CNEL at 50 Feet from Centerline		
S Centinela Ave between Venice Blvd & Washington Pl	1,020	325	100	72.9	73.1	0.2
S Centinela Ave between Washington Pl & W Washington Blvd	710	225	70	71.4	71.5	0.1
S Fairfax Ave between Venice Blvd & Washington Blvd	755	240	75	71.8	71.8	0.0
S La Cienega Blvd between Fairfax Ave & W Jefferson Blvd	1,330	420	135	74.1	74.3	0.2
S La Cienega Blvd between Venice Blvd & Washington Blvd	940	300	95	72.6	72.8	0.2
S La Cienega Blvd between Washington Blvd & Fairfax Ave	1,370	435	135	74.2	74.4	0.2
Sepulveda Blvd between Slauson Ave & W Centinela Ave	1,140	360	115	73.6	73.6	0.0
Sepulveda Blvd between Culver Blvd & Jefferson Blvd	550	175	55	71.2	70.4	-0.8
Sepulveda Blvd between Washington Blvd & Culver Blvd	305	95	30	68.6	67.9	-0.7
Sepulveda Blvd between Venice Blvd & Washington Pl	495	155	50	70.1	70.0	-0.1
Sepulveda Blvd between Washington Pl & Washington Blvd	355	110	35	69.0	68.5	-0.5
Sepulveda Blvd between Jefferson Blvd & Slauson Ave	1,275	405	125	75.5	74.1	-1.4
Sepulveda Blvd between Sawtelle Blvd & Jefferson Blvd	1,245	395	125	76.1	74.0	-2.1
Sepulveda Blvd between Jefferson Blvd & Sawtelle Blvd	975	310	100	73.9	72.9	-1.0
Slauson Ave between Jefferson Blvd & Sepulveda Blvd	925	290	90	71.6	72.7	1.1
Slauson Ave between W Jefferson Blvd & Washington Blvd	1,205	380	120	73.1	73.8	0.7
Venice Blvd between Sepulveda Blvd and Sawtelle Blvd	640	200	65	71.0	71.1	0.1
Venice Blvd between Overland Ave and Sepulveda Blvd	615	195	60	70.8	70.9	0.1
W Centinela Ave between Sepulveda Blvd & Green Valley Cir	1,405	445	140	74.6	74.5	-0.1
W Centinela Ave between Jefferson Blvd & Sepulveda Blvd	3,660	1,155	365	78.2	78.6	0.4
W Jefferson Blvd between National Blvd & Obama Blvd	555	175	55	69.9	70.4	0.5
W Jefferson Blvd between Obama Blvd & Duquesne Ave	940	300	95	73.5	72.8	-0.7
Washington Blvd between Overland Ave & Washington Pl	560	175	55	70.3	70.5	0.2
Washington Blvd between Duquesne Ave & Overland Ave	440	140	45	69.3	69.4	0.1
Washington Blvd between Washington Pl & Sepulveda Blvd	255	80	25	66.3	67.1	0.8
Washington Blvd between Culver Blvd & Duquesne Ave	215	70	20	66.4	66.4	0.0
Washington Blvd between Washington Pl & Lincoln Blvd	265	85	25	66.7	67.2	0.5
Washington Blvd between Inglewood Blvd & S Centinela Ave	525	165	55	66.0	70.2	4.2
Washington Blvd between Sawtelle Blvd & Inglewood Blvd	305	95	30	67.3	67.9	0.6
Washington Blvd between S Centinela Ave & W Washington Blvd	280	90	30	66.9	67.5	0.6
Washington Blvd between Sepulveda Blvd & Sawtelle Blvd	290	90	30	66.8	67.7	0.9
Washington Blvd between La Cienega Blvd & National Blvd	565	180	55	70.2	70.5	0.3
Washington Blvd between National Blvd & Culver Blvd	415	130	40	68.8	69.2	0.4
Washington Blvd between Fairfax Ave & La Cienega Blvd	565	180	55	70.2	70.5	0.3
Washington Blvd between S Centinela Ave & Washington Pl	345	110	35	67.9	68.4	0.5

Roadway Segment	Future Plus Project Distance (feet) to Centerline to			Future No Project Noise Levels	Future Plus Project Noise Levels	Increase
	60 dBA CNEL Contour	65 dBA CNEL Contour	70 dBA CNEL Contour	dBA CNEL at 50 Feet from Centerline		
Washington Blvd between Duquesne Ave & Overland Dr	435	135	45	69.2	69.4	0.2
Washington Blvd between National Blvd & Overland Ave	465	145	45	69.2	69.7	0.5
Washington Blvd between Overland Ave & Sepulveda Blvd	535	170	55	70.0	70.3	0.3
Washington Pl between Washington Blvd & Sepulveda Blvd	330	105	35	68.5	68.2	-0.3
Washington Pl between Inglewood Blvd & S Centinela Ave	320	100	30	68.4	68.1	-0.3
Washington Pl between S Centinela Ave & W Washington Blvd	320	100	30	68.3	68.1	-0.2
Washington Pl between Washington Blvd & Washington Blvd	320	100	30	68.1	68.1	0.0
Washington Pl between Sepulveda Blvd & Sawtelle Blvd	340	105	35	68.8	68.3	-0.5

NOTE: Bold value indicates significant impact.

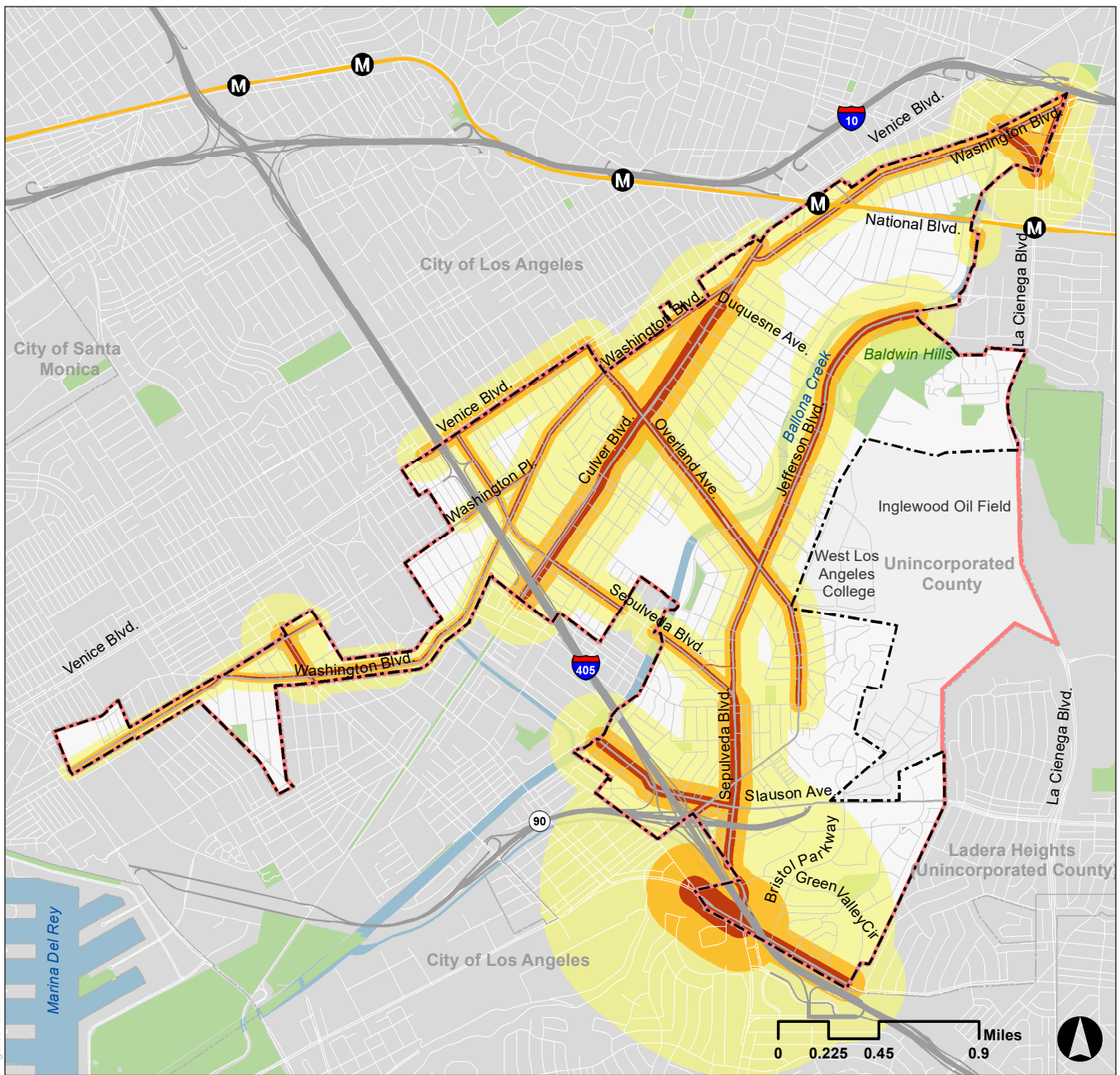
SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT and traffic volume data). Refer to noise modeling provided in Appendix F.

Railway Noise

As previously discussed, the Metro E Line passes through the northeast portion of the City along National Boulevard and crosses Washington, Robertson, and Venice Boulevards. The Culver City Station is located just east of the intersection of Venice Boulevard and S. Robertson Boulevard. Proposed General Plan 2045 Policies N-3.3, N-3.5, and N-3.8 are related to minimizing noise generated from mass transit railway sources. New or renovated noise-sensitive uses proposed along the Metro E Line route in Culver City and requiring discretionary approval would be required to evaluate potential train noise levels at the individual site and, if required, incorporate building designs or mitigation measures to meet applicable exterior and/or interior noise standards. Therefore, the impact from railway noise would be less than significant.

Stationary Noise

Future development under the General Plan 2045 could expose existing and new sensitive receptors to stationary noise sources, such as rooftop heating, ventilation, and air conditioning units. In addition, growth anticipated under the General Plan 2045 could expose existing and new sensitive receptors to stationary noise sources, particularly those associated with industrial uses. Any new development under the General Plan 2045 would be subject to the Culver City Municipal Code noise control ordinance. In addition, future projects would need to demonstrate consistency with the proposed General Plan policies aimed at reducing noise levels from adjacent properties. Proposed General Plan 2045 Policies N-5.1 and N-5.2 are related to minimizing noise generated from stationary sources. Through compliance with the Culver City Municipal Code noise control ordinance and General Plan policies, the impact from stationary noise would be less than significant.



- | | |
|----------------------|----------------------------|
| City Limits | Future Noise Levels |
| Sphere of Influence | 70 dB Contour |
| Metro Station | 65 dB Contour |
| E Line (Expo) | 60 dB Contour |
| Major Roads | |
| Local Roads | |
| Parks and Open Space | |
| Waterbody | |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 4.12-4
Future Roadway Noise Contour Map



Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. Future development would be required to comply with applicable noise control ordinances and standards as discussed above. Nonetheless, it is possible that some future development projects requiring discretionary approval could be large in construction intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise could exceed project-level significance thresholds. It is also possible that some future development projects could be large enough in size and/or intensity such that operational roadway traffic noise could exceed project-level significance thresholds. Therefore, future development within the City under the Project would result significant impact related to a substantial temporary or permanent increase in ambient noise levels and mitigation measures would be required.

Applicable Proposed General Plan Goals and Policies

Noise Element

Goal N-1: A peaceful community. A community with a peaceful noise environment that reduces or prohibits new sources of intrusive noise and effectively enforces noise standards.

N-1.1: Interior and exterior noise restrictions. Enforce the City's interior and exterior noise restrictions.

N-1.2: Land use decisions. Consistently apply noise standards and criteria in all land use decisions.

N-1.3: Noise evaluation. For proposed development in areas louder than 60 dBA CNEL, require noise evaluation for compliance with the State's 45 dBA CNEL interior noise levels standards.

N-1.4: Noise reduction measures. If new development does not meet the City's interior and exterior noise standards, require that noise reduction features are implemented in the development.

N-1.5: Noise reduction strategies. Implement noise reduction strategies in new developments that would generate noise that could impact nearby sensitive land uses.

N-1.6: Noise reduction strategies. Implement noise reduction strategies in new developments that would generate noise that could impact nearby sensitive land uses.

N-1.7: Noise regulation enforcement coordination. Ensure the Code Enforcement Division continues to coordinate with the Culver City Police Department on enforcing noise regulations set forth in the Culver City Municipal Code.

Goal N-2: Adjacent uses. A City review and approval process for new development that ensures projects are compatible with adjacent land uses.

N-2.1: Noise compatibility. In the land use planning process, consider noise compatibility with existing and proposed land uses, along with the anticipated increase in development needed to accommodate growth.

N-2.2: Land Use and Noise Compatibility Matrix. Use the “Land Use and Noise Compatibility Matrix” to assess the compatibility of proposed land uses with the noise environment.

N-2.3: Noise analysis and implementation methods. As appropriate, require a noise analysis and implementation of methods to minimize noise for land uses that are not “clearly compatible” as indicated by the Land Use and Noise Compatibility Matrix.

N-2.4: Land use incompatibility. Evaluate and identify ways to avoid locating incompatible land uses adjacent to freeways, and noisy industrial or recreational activities in the land use planning and development/environmental review process.

Goal N-3: Mobile sources of noise. A community that experiences minimal noise disturbance from transportation sources.

N-3.1: Roadway noise. Minimize noise impacts to noise-sensitive land uses from vehicles traveling on major and minor arterial roadways within the city.

N-3.2: Noise exposure from future planning. Coordinate land use and circulation plans to protect against noise exposure from future projects.

N-3.3: Coordination with regional transportation agencies for noise abatement measures. Coordinate with regional transportation agencies in the planning and development, maintenance, or redevelopment of existing and future transportation corridors, including mass transportation, to include noise abatement measures that comply with the City’s standards.

N-3.4: Truck movements. Evaluate truck movements and routes within the city to provide effective separation from residential or other noise-sensitive land uses. Review the City’s Municipal Code Traffic Regulations to ensure that designated truck routes do not negatively impact residential areas or other noise-sensitive land uses. Limit truck movements to those arterials designed to handle the traffic and those located further from the noise-sensitive areas.

N-3.5: Noise reduction technology. Mitigate City-controlled transportation-related noise sources through a program of technological improvements, like converting to electric vehicles.

N-3.6: Noise reduction measures from roadway projects. Consider noise reduction measures when designing roadway projects that may adversely affect sensitive land uses. Noise control measures may include increased vegetation, improving and maintaining roadway pavement, those related to site and building design features, and adding sound wall barriers.

N-3.7: Freeway noise impact coordination. Consult with the California Department of Transportation to minimize noise impacts from major freeways adjacent to residential or other sensitive land uses like SR-90, I-405, and I-10. Noise attenuation measures may include using alternative paving materials that can reduce traffic noise depending on roadway conditions and cost-efficiency, or constructing noise barriers, that break the “line of sight” between the noise source and potential receptors.

N-3.8: Noise from Metro transportation system. Minimize noise impacts from the Metro transportation system on residential and other sensitive land uses. For example,

coordinate with Metro to install noise attenuation features if the system negatively affects residential and other sensitive land uses.

N-3.9: Aircraft noise. Minimize noise impacts from aircraft flyovers through ground based mitigation strategies such as enhanced building shell noise reduction to comply with interior noise standard of 45 dBA CNEL.

N-3.10: Coordination with the Los Angeles World Airports and Federal Aviation Administration. Monitor LAX development process for potential impacts on Culver City, including the expansion of terminals and gates that may be used to accommodate increased operations, and make recommendations for mitigation.

N-3.11: LAX/Community Noise Roundtable. Continue to participate in the LAX/Community Noise Roundtable.

N-3.12: Monitor changes to aircraft operations implemented by the Federal Aviation Administration. Continue to work with Los Angeles International Airport and the Federal Aviation Administration to ensure that all applicable mitigation, both operational and construction, is provided.

Goal N-4: Construction noise. Minimized noise and vibration generated from construction activities.

N-4.1: Limit disturbance from new construction. Minimize construction noise and vibration impacts to reduce the disturbance from new development.

N-4.2: Construction hour enforcement. Enforce limits on construction hours as included in the City's Municipal Code.

N-4.4: Noise-sensitive construction techniques. Encourage using construction techniques that minimize noise and vibration levels.

Goal N-5: Stationary sources of noise. Minimize noise generated from operational stationary sources, including industrial and commercial activity, entertainment, sporting and other outdoor events, maintenance activity, and machinery.

N-5.1: Event noise. Minimize noise impacts from major outdoor events at educational institutions, parks, and other locations within the city.

N-5.2: Machinery noise. Minimize noise impacts from machinery, including pool and spa pumps, power tools in garages, gardening tools, and gasoline-powered leaf blowers. Enforce restrictions included in the Noise Ordinance limiting noise generated from these sources. Require screening or other noise reducing methods in the Building Permit process.

Mitigation Measures

As discussed above, it is possible that some future development projects under the General Plan 2045 and Zoning Code Update requiring discretionary approval could generate construction-period or operational-period roadway traffic noise levels that exceed the significance thresholds and result in a significant impact. Therefore, the following mitigation measure would be required.

MM NOI-1: Construction Noise. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
- Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
- Limit non-essential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM NOI-1 would help to reduce the potentially significant construction-related impacts resulting from a substantial temporary increase in ambient noise levels in the vicinity of future development projects in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. However, even with implementation of Mitigation Measure MM NOI-1, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

There are no feasible mitigation measures to reduce traffic noise levels. While General Plan 2045 policies would serve to limit traffic noise exposure to sensitive receptors, these policies cannot ensure that noise levels would be reduced to levels within the City's noise standards at all sensitive receptors. The ability to reduce impacts along roadways with measures such as sound walls or berms may not be feasible. The installation of traffic noise barriers along Washington Boulevard between Inglewood Boulevard and S Centinela Avenue, which is characterized by a mix of commercial and multi-family residential uses, is not possible as such barrier would prohibit the ability for pedestrians, visitors, and occupants to access the commercial and multi-family residential buildings. Barriers with breaks or gaps for standards and emergency access would negate intended noise reduction benefits. No additional feasible mitigation measures are available beyond consistency with proposed General Plan 2045 policies. Therefore, traffic noise impacts would be significant and unavoidable.

Excessive Groundborne Vibration or Groundborne Noise

Threshold NOI-2: The Project would have a significant impact if future development allowed by the General Plan and Zoning Code updates would generate excessive groundborne vibration or groundborne noise.

Impact Statement NOI-2: The Project would result in a potentially significant impact during construction of future development projects that could exceed the significance thresholds. While implementation of mitigation measures would reduce the severity of the impacts, impacts could still exceed the significance thresholds. Thus, groundborne vibration or groundborne noise during construction would be significant and unavoidable. The Project would result in a less than significant impact related to excessive groundborne vibration or groundborne noise during operation of future development projects.

The General Plan 2045 would allow for the construction of new developments or renovations to existing developments to achieve the objectives of the Project as outlined in Chapter 2, *Project Description*. The exact locations of future projects and construction methods for the future projects are not known at this time. However, it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the City is generally built out. Proposed General Plan 2045 Policies N-4.1, N-4.2, N-4.3, and N-4.4 are related to minimizing groundborne noise and groundborne vibration generated from construction activities. The severity of construction-related vibration impacts depends on the proximity of construction activities to sensitive receptors, the types of equipment used, and the duration and intensity of the activity.

Vibration levels measured in RMS are best for characterizing human response to vibration and vibration levels measured in PPV are best for characterizing the potential for building or structure damage. Therefore, vibration impact analyses describe the potential for human annoyance impacts using vibration levels in VdB and the potential for building damages using vibration levels in PPV (inch/sec).

Groundborne vibration and groundborne noise impacts occur normally within building interiors or at a physical structure. Therefore, groundborne vibration and groundborne noise impacts are normally assessed based on the distance from the source of the vibration, which is typically vibration-generating equipment used within the construction area boundary, to the nearest building or structure. Reference vibration levels in PPV (inch/sec) and VdB for construction equipment at a reference distance of 25 feet are provided in **Table 4.12-11, *Vibration Source Amplitudes for Construction Equipment***.

**TABLE 4.12-11
VIBRATION SOURCE AMPLITUDES FOR CONSTRUCTION EQUIPMENT**

Equipment	Reference PPV/L _v at 25 Feet	
	PPV (inch/sec)	L _v (VdB)
Pile Driver (impact), upper range	1.518	112
Pile Driver (impact), typical	0.644	104
Pile Driver (sonic), upper range	0.734	105
Pile Driver (sonic), typical	0.170	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall), in soil	0.008	66
Hydromill (slurry wall), in rock	0.017	75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

NOTES: PPV = peak particle velocity; L_v = velocity in decibels; inch/sec = inches per second; VdB = vibration velocity decibels
SOURCE: FTA 2018, Table 7-4.

Structural Damage During Construction

Based on Table 4.12-2, a vibration level of more than 0.12 inch/sec PPV, 0.2 inch/sec PPV, 0.3 inch/sec PPV, or 0.5 PPV inch/sec would potentially result in building or structure damage, depending on the building or structure category, with fragile buildings or structures at the lowest end of the range and reinforced buildings or structures at the higher end of the range. Table 4.12-11 shows that most construction equipment would not result in a vibration level that would exceed 0.12 inch/sec PPV measured at a distance of 25 feet with the exception of certain types of pile driving and clam shovel equipment. However, if equipment were to operate closer than 25 feet to a building or structure, groundborne vibration levels would be higher than shown in Table 4.12-11 and may exceed the threshold levels, depending on the actual distance.

Depending on the proximity of the future developments to vibration-sensitive buildings or structures, construction activities could generate excessive ground vibration and potentially exceed damage criteria for surrounding existing structures. Construction-generated groundborne vibration may exceed the criteria for structural damage at structures near future projects, which would result in a significant impact. The intensity of construction activities and locations of the future projects would dictate whether the level of groundborne vibration and groundborne noise during construction would be above or below the significance thresholds.

For future development requiring discretionary approval, a project-specific groundborne vibration and groundborne noise analysis would be prepared to determine significance in accordance with

CEQA. Through each environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require the implementation of mitigation measure(s). It is possible that some future projects facilitated by the General Plan 2045 would be large in construction intensity or located near vibration-sensitive buildings or structures, such that multiple pieces of equipment or other sources of groundborne vibration and/or groundborne noise would cause levels to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual. Therefore, construction activities for future projects facilitated by the General Plan 2045 could result in significant construction groundborne vibration and groundborne noise levels in excess of standards and result in a significant impact and mitigation measure(s) would be required.

Human Annoyance During Construction

Based on the reference vibration levels from construction equipment shown in Table 4.12-11, some equipment could exceed groundborne vibration human annoyance criteria. As previously discussed, Table 8-3 in the FTA's Transit Noise and Vibration Impact Assessment Manual states that the vibration criteria for analysis is typically 78 VdB for residential uses during daytime hours. During nighttime hours, the vibration criterion is 72 VdB. For office and commercial buildings, the FTA guidelines suggest that a vibration level of 84 VdB should be used for detailed analysis. Table 4.12-11 shows that some equipment would exceed these values at a reference distance of 25 feet.

Depending on the proximity of the future developments to vibration-sensitive receptors, construction activities could generate excessive ground vibration and potentially exceed the human annoyance criteria for surrounding receptors. The construction intensity and locations of the future projects would dictate whether the level of groundborne vibration and groundborne noise during construction would be above or below the significance thresholds. For future development requiring discretionary approval, a project-specific groundborne vibration and groundborne noise analysis would be prepared to determine significance in accordance with CEQA. Through each environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require the implementation of mitigation measure(s). It is possible that some future projects facilitated by the General Plan 2045 would be large in construction intensity or located near vibration-sensitive receptors, such that multiple pieces of equipment or other sources of groundborne vibration and/or groundborne noise would cause levels to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual. Therefore, construction activities for future projects facilitated by the General Plan 2045 could result in significant construction groundborne vibration and groundborne noise levels in excess of standards and result in a significant impact and mitigation measure(s) would be required.

Structural Damage and Human Annoyance During Operation

The operation of future development requiring discretionary approval facilitated by adoption of the General Plan 2045 could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors.

With respect to groundborne vibration and groundborne noise from vehicle and truck traffic, Caltrans has studied the impacts of propagation of vehicle vibration on sensitive land uses and notes that “heavy trucks, and quite frequently buses, generate the highest earthborne vibrations of normal traffic”.²⁵ Caltrans further notes that the highest traffic-generated vibrations are along freeways and state routes. Their study finds that “vibrations measured on freeway shoulders (5 m [meters] from the centerline of the nearest lane) have never exceeded 2 mm/s [millimeters per second], with the worst combinations of heavy trucks” and that “[t]his amplitude coincides with the maximum recommended ‘safe level’ for ruins and ancient monuments (and historic buildings)”.²⁶

A vibration level of 2 millimeters per second is approximately 0.08 in/sec. Typically, groundborne vibration generated by human-made activities attenuates rapidly with distance from the source of the vibration. Vehicles traveling along freeways and state routes would cause infrequent and inconsistent vibration events that would attenuate quickly after onset. Sensitive receptors would likely be located further away than 15 meters from a freeway or highway and would therefore experience levels lower than 0.08 in/sec. Further, the FTA guidelines state that buildings that are extremely susceptible to building damage (e.g., historic buildings) could experience structural damage at 0.12 in/sec. Thus, roadway traffic is not expected to generate excessive vibration in excess of the FTA’s threshold of 0.12 in/sec for extremely susceptible buildings and associated impacts would be less than significant. Similarly, the infrequent and inconsistent vibration events combined with typical distances of buildings from freeways and highways would ensure impacts related to human annoyance would be less than significant and no mitigation is required.

With respect to groundborne vibration and groundborne noise from stationary mechanical equipment, according to the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), stationary equipment such as pumps and compressors generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot (ASHRAE 1999). At 25 feet, this vibration level drops to approximately 0.004 in/sec PPV at 25 feet (approximately 60 VdB). Any future project that includes stationary equipment would locate such equipment on building rooftops or within or near buildings such that the equipment would not generate groundborne vibration off the project site. Therefore, groundborne vibration from the operation of such mechanical equipment is not expected to generate excessive vibration. Groundborne vibration and groundborne noise impacts during operation would be less than significant and no mitigation is required.

Zoning Code Update

The Zoning Code Update would establish new zoning districts and associated development standards to correspond with and implement the General Plan 2045 within the city. It is possible that some future development projects requiring discretionary approval could be large in construction intensity or located near vibration-sensitive receptors, such that multiple pieces of equipment or other sources of groundborne vibration and/or groundborne noise would cause

²⁵ Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.

²⁶ Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.

levels to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance. Therefore, construction of future development within the City under the Project would result significant impact related to excessive groundborne vibration or groundborne noise and mitigation measures would be required. Operation of future development projects requiring discretionary approval within the City under the Project could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. As discussed above, groundborne vibration and groundborne noise from operational sources would be characterized as typically low and would be expected to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance. Groundborne vibration and groundborne noise impacts during operation would be less than significant and no mitigation is required.

Applicable Proposed General Plan Goals and Policies

Noise Element

Goal N-4: Construction noise. Minimized noise and vibration generated from construction activities.

N-4.1: Limit disturbance from new construction. Minimize construction noise and vibration impacts to reduce the disturbance from new development.

N-4.2: Construction hour enforcement. Enforce limits on construction hours as included in the City's Municipal Code.

N-4.3: Construction vibration analysis. Require analysis of construction vibration in accordance with established construction vibration guidelines.

N-4.4: Noise-sensitive construction techniques. Encourage using construction techniques that minimize noise and vibration levels.

Mitigation Measures

As discussed above, it is possible that some future development projects under the General Plan and Zoning Code Update requiring discretionary approval could generate construction-period groundborne vibration and groundborne noise levels that exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance and result in a significant impact. Therefore, the following mitigation measure would be required.

MM NOI-2: Construction Vibration. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential

project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.

Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet.
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet.
- Roller (for site ground compaction or paving): 75 feet.
- Impact pile-driving: 280 feet.

This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM NOI-2 stated above would reduce the severity of the impacts to excessive groundborne vibration or groundborne noise. However, even with implementation of Mitigation Measure MM NOI-2, impacts during construction could exceed the significance thresholds and construction impacts would be significant and unavoidable. Groundborne vibration and groundborne noise impacts during operation would be less than significant and no mitigation is required.

4.12.6 Cumulative Impacts Analysis

The geographic context for the analysis of cumulative noise and vibration impacts depends on the impact being analyzed. For construction and operational stationary source impacts, only the immediate area around an individual development site would be included in the cumulative context. For operational roadway related impacts, the context is existing and future development in Culver City, in conjunction with ambient growth and other development within the vicinity of the City.

Noise

Construction

An increase in noise at sensitive uses would occur as a result of the construction of multiple development projects allowed under the Project. Where projects in the vicinity are adjacent to the construction of development projects allowed under the General Plan and Zoning Code Update, the combined construction noise levels would have a cumulative effect on nearby

sensitive uses. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels, but would result in a 3 dBA increase over a single source. However, cumulative construction noise levels could be in excess of the noise standards established in the CCMC Noise Ordinance standards, thus resulting in a cumulative construction noise impact.

Determining the exact location and potential noise levels of future construction activities would be considered speculative at this time. Further, construction noise levels would be considered a temporary nuisance, as the increase in noise levels would only occur during the use of construction equipment associated with each development project. As discussed earlier, construction at each site within the City would be required to comply with the CCMC Noise Ordinance. Noise is a localized phenomenon, and because the City is predominately developed with urban uses, it is possible that multiple construction projects could occur simultaneously and in close enough proximity to each other to create a significant combined noise impact. Therefore, the contribution of the Project to any potential cumulative construction noise impact would be cumulatively considerable.

Stationary

Future development that would occur as a result of the Project would include stationary noise sources such as, rooftop heating, ventilation, and air conditioning units. Any new development would be subject to the CCMC noise control ordinance and to General Plan and Zoning Code Update policies aimed at reducing noise levels from adjacent properties. The City is predominately developed with urban uses; thus, periodic infill development or redevelopment of existing uses in various areas of the City would be expected to occur. Through compliance with the CCMC noise control ordinance, the impact from stationary noise would not be cumulatively considerable.

Traffic

Permanent increases in noise would occur primarily as a result of increased traffic on local roadways due to development that would occur under the Project and ambient growth through 2045 throughout the region. Related development in adjacent jurisdictions may contribute traffic to the city roadway network. Cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future cumulative base traffic volumes in the project vicinity. **Table 4.12-12, *Cumulative Traffic Noise Impacts***, shows the impact of cumulative traffic noise at General Plan buildout on existing sensitive receptors, such as the residences near the roadway segments. The 2045 General Plan Buildout traffic volumes, which includes increases in traffic due to ambient growth in surrounding areas, is compared to existing traffic volumes. As shown, existing sensitive receptors located near roadway segments would experience cumulative noise level increases greater than 3.0 dBA CNEL for two roadway segments. More specifically, an increase of 3.8 dBA CNEL would occur along the segment of Slauson Avenue between Jefferson Boulevard and Sepulveda Boulevard and 11.2 dBA CNEL increase along the segment of Slauson Avenue between W Jefferson Boulevard and Washington Boulevard. Therefore, the increase in traffic noise from the Project in conjunction with ambient growth and other development within the vicinity of Culver City would result in a significant cumulative impact. As shown in Table 4.12-10, future project increases in future traffic noise levels compared to future no project would reach 4.2 dBA CNEL along one roadway segment

(Washington Boulevard between Inglewood Boulevard and S Centinela Avenue). Therefore, the contribution of the Project to this cumulative traffic noise impact would be cumulatively considerable and impacts would be potentially significant.

**TABLE 4.12-12
CUMULATIVE TRAFFIC NOISE IMPACTS**

	Existing Noise Levels	Future Plus Project Noise Levels	Increase
Roadway Segment	dBA CNEL at 50 Feet from Centerline		
Adams Blvd between Washington Blvd & Fairfax Ave	64.8	64.2	-0.5
Culver Blvd between Overland Ave & Sepulveda Blvd	72.7	73.9	1.2
Culver Blvd between Sepulveda & Sawtelle Blvd	72.5	73.8	1.3
Culver Blvd between Washington Blvd & Duquesne Ave	69.1	70.6	1.6
Culver Blvd between Washington Blvd & Washington Blvd	70.9	71.0	0.0
Culver Blvd between Duquesne Ave & Overland Ave	72.6	74.9	2.3
Fairfax Ave between Washington Blvd & La Cienega Blvd	72.6	71.9	-0.7
Jefferson Blvd between Slauson Ave & Inglewood Blvd	71.4	72.5	1.1
Jefferson Blvd between Sepulveda Blvd & Slauson Ave	69.5	65.9	-3.6
Jefferson Blvd between Overland Ave & Sepulveda Blvd	70.8	70.8	0.0
Jefferson Blvd between Duquesne Ave & Overland Ave	73.4	72.0	-1.4
Jefferson Blvd between Overland Ave & Sawtelle Blvd	66.3	67.6	1.2
Jefferson Blvd between Obama Blvd & Duquesne Ave	73.4	72.7	-0.7
Machado Rd between Jefferson Blvd & Sepulveda Blvd	62.9	62.5	-0.4
Overland Ave between Venice Blvd & Washington Blvd	69.5	70.0	0.5
Overland Ave between Washington Blvd & Culver Blvd	69.8	71.8	2.0
Overland Ave between Culver Blvd & Jefferson Blvd	69.4	72.1	2.8
Overland Ave between Jefferson Blvd & Sawtelle Blvd	69.7	71.1	1.4
S Centinela Ave between Washington Blvd & Culver Blvd	69.2	68.8	-0.4
S Centinela Ave between Venice Blvd & Washington Pl	72.7	73.1	0.4
S Centinela Ave between Washington Pl & W Washington Blvd	71.1	71.5	0.4
S Fairfax Ave between Venice Blvd & Washington Blvd	70.0	71.8	1.8
S La Cienega Blvd between Fairfax Ave & W Jefferson Blvd	72.6	74.3	1.7
S La Cienega Blvd between Venice Blvd & Washington Blvd	70.9	72.8	1.9
S La Cienega Blvd between Washington Blvd & Fairfax Ave	72.7	74.4	1.6
Sepulveda Blvd between Slauson Ave & W Centinela Ave	72.0	73.6	1.6
Sepulveda Blvd between Culver Blvd & Jefferson Blvd	72.0	70.4	-1.5
Sepulveda Blvd between Washington Blvd & Culver Blvd	70.0	67.9	-2.1
Sepulveda Blvd between Venice Blvd & Washington Pl	71.4	70.0	-1.5
Sepulveda Blvd between Washington Pl & Washington Blvd	70.9	68.5	-2.4
Sepulveda Blvd between Jefferson Blvd & Slauson Ave	73.1	74.1	1.0
Sepulveda Blvd between Sawtelle Blvd & Jefferson Blvd	75.5	74.0	-1.5

4. Environmental Impact Analysis

4.12. Noise

	Existing Noise Levels	Future Plus Project Noise Levels	Increase
Roadway Segment	dBA CNEL at 50 Feet from Centerline		
Sepulveda Blvd between Jefferson Blvd & Sawtelle Blvd	71.8	72.9	1.1
Slauson Ave between Jefferson Blvd & Sepulveda Blvd	68.8	72.7	3.8
Slauson Ave between W Jefferson Blvd & Washington Blvd	62.6	73.8	11.2
Venice Blvd between Sepulveda Blvd and Sawtelle Blvd	69.8	71.1	1.2
Venice Blvd between Overland Ave and Sepulveda Blvd	70.1	70.9	0.8
W Centinela Ave between Sepulveda Blvd & Green Valley Cir	72.3	74.5	2.2
W Centinela Ave between Jefferson Blvd & Sepulveda Blvd	76.1	78.6	2.5
W Jefferson Blvd between National Blvd & Obama Blvd	70.8	70.4	-0.4
W Jefferson Blvd between Obama Blvd & Duquesne Ave	73.4	72.8	-0.7
Washington Blvd between Overland Ave & Washington Pl	70.9	70.5	-0.4
Washington Blvd between Duquesne Ave & Overland Ave	69.2	69.4	0.3
Washington Blvd between Washington Pl & Sepulveda Blvd	66.5	67.1	0.6
Washington Blvd between Culver Blvd & Duquesne Ave	67.6	66.4	-1.2
Washington Blvd between Washington Pl & Lincoln Blvd	68.3	67.2	-1.1
Washington Blvd between Inglewood Blvd & S Centinela Ave	69.0	70.2	1.2
Washington Blvd between Sawtelle Blvd & Inglewood Blvd	68.8	67.9	-1.0
Washington Blvd between S Centinela Ave & W Washington Blvd	67.4	67.5	0.0
Washington Blvd between Sepulveda Blvd & Sawtelle Blvd	68.4	67.7	-0.7
Washington Blvd between La Cienega Blvd & National Blvd	71.6	70.5	-1.0
Washington Blvd between National Blvd & Culver Blvd	70.7	69.2	-1.5
Washington Blvd between Fairfax Ave & La Cienega Blvd	71.3	70.5	-0.7
Washington Blvd between S Centinela Ave & Washington Pl	68.5	68.4	-0.1
Washington Blvd between Duquesne Ave & Overland Dr	69.1	69.4	0.3
Washington Blvd between National Blvd & Overland Ave	70.6	69.7	-0.9
Washington Blvd between Overland Ave & Sepulveda Blvd	70.7	70.3	-0.4
Washington Pl between Washington Blvd & Sepulveda Blvd	69.2	68.2	-1.0
Washington Pl between Inglewood Blvd & S Centinela Ave	70.4	68.1	-2.3
Washington Pl between S Centinela Ave & W Washington Blvd	70.2	68.1	-2.2
Washington Pl between Washington Blvd & Washington Blvd	70.8	68.1	-2.7
Washington Pl between Sepulveda Blvd & Sawtelle Blvd	69.7	68.3	-1.4

NOTE: Bold value indicates significant impact.

SOURCE: ESA, 2024; Fehr & Peers, 2024 (VMT and traffic volume data). Refer to noise modeling provided in Appendix E.

Groundborne Vibration or Groundborne Noise

Construction

Vibration generated by the construction of multiple development projects allowed under the Project could combine if located in proximity to each other and could exceed vibration thresholds at sensitive receptors, thus resulting in a potential cumulative construction vibration impact.

Determining the exact location and potential vibration levels of future construction activities would be considered speculative at this time. Further, construction vibration levels would be considered a temporary nuisance, as the increase in noise levels would only occur during the use of construction equipment associated with each specific development project. As discussed earlier, construction of future development projects requiring discretionary approval within the city would be required to undergo site specific environmental review as required by CEQA. Vibration is a localized phenomenon. Since the City is predominately an urban landscape and primarily built out, future development would be periodic infill development in various areas of the city. It is possible that multiple construction projects would occur simultaneously and in close enough proximity to each other to create a significant combined vibration impact. Therefore, the contribution of the Project to potential cumulative construction vibration impact would be cumulatively considerable.

Traffic

Permanent increases in vibration would occur primarily as a result of increased traffic on local roadways due to future development under the Project and ambient growth through 2045 throughout the region. Vibration from these sources, while remote, could combine and exceed vibration thresholds at sensitive receptors, thus resulting in a potential cumulative operational (traffic) vibration impact.

As discussed above, vibration from vehicles is temporary and intermittent and generates up to 61 Vdb or 0.005 in/sec PPV.²⁷ As a result, vibration levels from traffic generated by growth anticipated by the Project would be well below the thresholds for human annoyance and structural damage. Therefore, the contribution of the Project to any potential cumulative operational (traffic) vibration impact would not be cumulatively considerable.

²⁷ FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

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4.13 Population and Housing

4.13.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts related to the population, employment, and housing associated with the implementation of the Project. The analysis includes a review of the potential to induce population growth and subsequently require additional housing from future development allowed under the Project, as well as the potential displacement of people or housing. The section provides context regarding the current population, housing, and employment, growth trends and projections in the Planning Area, and relevant federal, state, and local regulations and programs. Future discretionary projects facilitated by the Project would be evaluated for project-specific impacts related to population and housing at the time they are proposed. Potential growth-inducing impacts from future development allowed under the Project are further addressed in Chapter 6, *Other CEQA Considerations*, of this Draft PEIR.

4.13.2 Environmental Setting

Population Growth Trends

Culver City is located within Los Angeles County, which is the most populous county in both California and the United States. As of 2020, Culver City accounted for approximately 0.4 percent of over 10 million residents in the county, and the city has added approximately 1,983 residents (approximately 5.1 percent growth) since 2000.¹ The city's overall population growth has kept pace with the county's growth of approximately 5.2 percent over the same period.

Following its incorporation in 1917, Culver City's population grew rapidly. Culver City had its most dramatic population increase in the decade after incorporation when the city's population grew from 503 residents to 5,669 residents (1,072 percent increase). From 1930 to 1960, the city's population continued to grow rapidly to 32,163 residents. However, the population growth rate began declining after 1960. Between 1970 and 1980, the population growth rate decreased to 7.1 percent and remained below 2 percent over the decade from 1990 to 2000. As noted in Chapter 2, *Project Description*, Culver City's population was 40,800 residents in 2020, representing a 5.1 percent growth since 2000.²

Housing Growth Trends

As described in Section 4.10, *Land Use and Planning*, of this PEIR, 39.6 percent of land in Culver City is currently made up of residential uses, the majority of which is single-family residential. Single-family residential uses are mostly situated on gridded neighborhood streets. Some neighborhoods, including Park West and Sunkist Park, are almost entirely comprised of single-

¹ Culver City, 2020a. Culver City General Plan Update: Housing Element Existing Conditions Report. Table 1: Population Trends in Culver City and LA County. <https://www.pictureculvercity.com/resources>. Accessed February 2023.

² Culver City, 2020a. Culver City General Plan Update: Housing Element Existing Conditions Report. Table 1: Population Trends in Culver City and LA County. <https://www.pictureculvercity.com/resources>. Accessed February 2023.

family uses. Other neighborhoods, including Park East, Studio Village, Clarkdale, and Washington Culver, have a mix of single-family and multi-family housing. Multi-family housing in these neighborhoods is generally low density (fewer than approximately 20 dwelling units per acre).

The most common multi-family housing types in these neighborhoods are townhomes, duplexes, triplexes, and fourplexes or "dingbats" (two- to three-story stucco apartment buildings with tuck-under parking). Many single-family residences, particularly in the Park East and West neighborhoods, have either stand-alone or above-garage accessory dwelling units (ADUs). ADUs, also known as granny flats, are small housing units built on a property.

Housing is also located on regional arterials, including Washington, Venice, and Sepulveda Boulevards. Most of this housing stock is in the form of mixed-use apartment or condominium buildings that are between two and five stories high, with some ground-floor commercial uses. The Fox Hills neighborhood has a significant amount of multi-family residential development, particularly along Green Valley Circle, Buckingham Parkway, and Canterbury Drive. Apartments and condominiums in this area are mostly garden or courtyard-style buildings and are usually at least three stories.

Table 4.13-1, *Housing Units 2000–2020*, shows growth in housing units in Culver City and Los Angeles County from 2000 to 2020. The number of housing units in the city increased from 17,130 housing units in 2000 to 17,819 housing units in 2020, a 4.02 percent increase. The County grew from 3,270,909 housing units in 2000 to 3,591,981 housing units in 2020, a 9.82 percent increase. During the same period, the city’s number of housing units comprised, on average, approximately 0.5 percent of the county’s housing units.

**TABLE 4.13-1
 HOUSING UNITS 2000–2020**

	2000	2010	2020	2000–2020 Change
Culver City	17,130	17,491	17,819	4.02%
Los Angeles County	3,270,909	3,443,087	3,591,981	9.82%
Culver City Share of County	0.52%	0.51%	0.49%	—

SOURCES: Culver City, 2022a. Housing Element. <https://www.pictureculvercity.com/housing-element>; California Department of Finance, 2021. E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011–2020, with 2010 Census Benchmark. May 2021.

Table 4.13-2, *Household Size 2000–2019*, compares household sizes in the Culver City and Los Angeles County from 2000 to 2019. Average household size in the city increased slightly from 2.31 persons per household in 2000 to 2.33 persons per household in 2019. Average household size in the County increased from 2.98 persons per household in 2000 to 2.99 persons per household in 2019. Overall, the city has maintained a lower average household size than the County over the last 19 years.

**TABLE 4.13-2
HOUSEHOLD SIZE 2000–2019**

	2000	2010	2019
Culver City	2.31	2.30	2.33
Los Angeles County	2.98	2.98	2.99

SOURCES: California Department of Finance, 2012. E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000–2010. Sacramento, California, November 2012; California Department of Finance, 2021. E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011–2020, with 2010 Census Benchmark. May 2021; Culver City, 2022a. Housing Element. <https://www.pictureculvercity.com/housing-element>.

As of December 2019, the City has approximately 1,550 housing units in the development pipeline. Many low density (fewer than approximately 12 units) residential projects are infill developments in existing residential neighborhoods. Higher density residential developments are largely located along major roadways, in the Downtown, and near the Metro E Line station. Examples of significant multi-family projects include Jefferson Park (259 units), a senior housing development on Washington Boulevard (116 units), and 12717 Washington Boulevard (116 units). These projects are in the Studio Village, Clarkdale, and Culver West neighborhoods, respectively.³

Employment Growth Trends

Employment in Culver City has fluctuated over the past 20 years, partly due to the 2008 recession, but has generally been increasing, with an approximate 14 percent growth in jobs between 2010 and 2019.^{4,5} Based on data from the U.S. Census Bureau, there were approximately 68,039 jobs in Culver City in 2019 and the percentage breakdown by industry is as follows: Office Services (60.9 percent); Retail Services (9.6 percent); Medical Services (6.7 percent); Education (3.6 percent); Manufacturing (3.5 percent); Restaurants (3.1 percent); Accommodations (3.1 percent); Wholesale (2.6 percent); Other Retail (2.6 percent); Public Administration (1.8 percent); Construction (1.1 percent); Arts & Entertainment (0.8 percent); and Transportation/Warehouse (0.7 percent).⁶ Land uses within the SOI are comprised of the Inglewood Oil Field (IOF) and West Los Angeles College, as well as a cemetery.

Jobs to housing ratios relate the spatial match between jobs and housing and are often used as indicators of economic vitality and quality of life. A regional balance of jobs-to-housing helps ensure that the demand for housing is reasonably related to supply. A high ratio of jobs to housing indicates a housing shortage and may lead to an unbalance in the rental and for-sale housing markets, requiring households to pay a larger share of their income on housing, as well as issues of housing affordability, as there is not enough housing to accommodate all the workers. This results in overcrowding and increases traffic congestion from longer commutes as workers seek more affordable housing in outlying areas.

³ Culver City, 2020b. Culver City Land Use and Community Design Existing Conditions Report. <https://www.pictureculvercity.com/resources>. Accessed February 2023.

⁴ United States Census Bureau, 2010. OnTheMap web application, Work Area Profile Analysis by Place of Work. <https://onthemap.ces.census.gov/>. Accessed March 2023.

⁵ Raimi +Associates. 2022. Preferred Land Use Projections. November 2022.

⁶ Raimi +Associates. 2022. Preferred Land Use Projections. November 2022.

Based on 17,010 housing units and 68,040 jobs in 2019, the jobs to housing ratio for the baseline year of 2019 is 4.00.⁷ Although there are 4.00 jobs per every housing unit under the 2019 baseline conditions, many people who work in Culver City live in nearby Westside cities, including Santa Monica, Beverly Hills, and West Hollywood, and commute relatively short distances. This could mean the workforce residing nearby could offset the imbalanced jobs to housing ratio. However, various studies have found that over 65 percent of the Westside cities' workforce commutes from outside the Westside.^{8,9}

4.13.3 Regulatory Framework

This section provides the relevant state, regional, and local regulations applicable to the Project. There are no federal regulations which apply to the Project.

State

California Government Code

Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth that would occur in each county based on California Department of Finance (DOF) population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, HCD provides the RHNA to the council, which for the region is the Southern California Association of Governments (SCAG). SCAG then assigns a share of the regional housing need to each of its cities and counties.

State law recognizes the vital role local governments play in the supply and affordability of housing. California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including persons with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.

⁷ Raimi + Associates, Preferred Plan Growth Projections. November 2022.

⁸ Southern California Association of Governments, 2009. Westside Cities Workforce Housing Study. February 2009. https://scag.ca.gov/sites/main/files/file-attachments/westsideworkforcehousingstudy_ppt.pdf?1604179191. Accessed March 2023.

⁹ Los Angeles County Metropolitan Transportation Authority, 2015. Subregional Mobility Matrix Westside Cities Final Report. March 2015. https://media.metro.net/projects_studies/Irtp/images/report_mobility_westside.pdf. Accessed March 2023.

- Assist in the development of adequate housing to meet the needs of low and moderate income households.
- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve for lower-income households the publicly assisted multifamily housing developments in each community.

The State of California housing element laws (Sections 65580 to 65589 of the California Government Code) require that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community commensurate with local housing needs.

Housing Element Law (Article 10.6)

The “No Net Loss” provisions in Section 65583.2 of the Housing Element law were established to make sure that housing elements identify sufficient sites to accommodate the jurisdiction’s RHNA or include programs to ensure that sites will be available throughout the planning period. Under the “No Net Loss” requirements, a jurisdiction may not reduce residential density or allow development at a lower residential density unless the jurisdiction makes findings supported by substantial evidence that the reduction is consistent with the general plan and there are remaining sites identified in the housing element adequate to meet the jurisdiction’s outstanding RHNA.

Housing Crisis Act of 2019 – (Senate Bill 330, Skinner)

On October 9, 2019, the Governor signed into law the Housing Crisis Act of 2019 (Senate Bill [SB] 330). SB 330 seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020, but is temporary in nature as the bill’s provisions expire on January 1, 2025.

California Relocation Law, Public Resources Code Section 7260 et seq.

The California Relocation Law requires the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity. The law requires agencies to prepare a relocation plan, provide relocation payments, and identify substitute housing opportunities for any resident that is to be displaced by a public project.

Sustainable Communities and Climate Protection Act of 2008 (Chapter 728, Statutes of 2008)

The Sustainable Communities and Climate Protection Act of 2008, otherwise known as SB 375, requires the integration of land use, housing, and transportation planning to achieve regional greenhouse gas (GHG) emission reductions, adopted by the California Air Resources Board. SB 375 requires Metropolitan Planning Organizations (MPOs) to develop a Sustainable Communities Strategy (SCS)—a new element of the regional transportation plan (RTP)—to plan for achieving these GHG reduction targets. The SCS must demonstrate the attainment of the regional GHG emissions reduction targets while accommodating the full projected population of the region.

Regional

Southern California Association of Governments

The Planning Area is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and state law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the MPO for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), RTP/SCS, and RHNA, in coordination with other state and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions. Subregions play an important role as a conduit between SCAG and cities and counties of the region by participating and providing input on SCAG's planning activities, which helps the Regional Council and its committees make better-informed decisions. The Planning Area is located within the Westside Cities Council of Governments (WCCOG) Subregion.

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in the SCAG 2020 RTP/SCS serve as the bases for demographic estimates in this analysis of Project consistency with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and procedures.

SCAG data is periodically updated to reflect changes in development activity and provisions of local jurisdictions (e.g., zoning changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

SCAG Connect SoCal (2020 RTP/SCS)

The 2020 RTP/SCS, known as Connect SoCal, was developed through a four-year planning process that involved rigorous technical analysis, extensive stakeholder engagement and robust policy discussions with local elected leaders, who make up SCAG's policy committees and Regional Council. The 2020 RTP/SCS charts a path toward a more mobile, sustainable and prosperous region by making key connections: between transportation networks, between

planning strategies and between the people whose collaboration can make plans a reality. The 2020 RTP/SCS was completed in May 2020 and approved and adopted by the Regional Council on September 3, 2020.

The 2020 RTP/SCS embodies a collective vision for the region's future, through the horizon year of 2045. It is developed with input from a wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura, including public agencies, community organizations, elected officials, tribal governments, the business community and the general public. The 2020 RTP/SCS is an important planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and state funding. The plan includes robust financial analysis that considers operations and maintenance costs to ensure the existing transportation system's reliability, longevity, resilience and cost effectiveness. In addition, the 2020 RTP/SCS is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.¹⁰

In addition, the 2020 RTP/SCS establishes policies pertaining to regional growth and efficient development patterns to reduce development impacts on traffic congestion and related increases in air quality emissions.

SCAG Regional Housing Needs Assessment

The RHNA is mandated by state housing law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods, or cycles. In prior cycles, factors such as household growth and household income distribution were the primary factors considered in determining a jurisdiction's RHNA allocation. SCAG's 6th Cycle RHNA quantifies the regional need for housing and then allocates the regional need to each jurisdiction for a planning period between October 2021 and October 2029. The 6th Cycle RHNA is focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine the 2020 RTP/SCS's projected growth.¹¹ Therefore, the 6th Cycle RHNA allocation for the city results in a higher allocation of housing than what is represented in the 2020 RTP/SCS, which is focused solely on projected or future growth. For the 6th RHNA Cycle, SCAG considers other factors in addition to household growth. These factors include transit accessibility, job accessibility, and indicators that influence a community's environmental, educational, and economic resource accessibility.

¹⁰ Southern California Association of Governments, 2020a. Connect SoCal (2020 RTP/SCS), page 8. Adopted September 3, 2020.

¹¹ Southern California Association of Governments, 2020b. Final RHNA Allocation Methodology, page 5. Adopted March 5, 2020.

On October 15, 2019, SCAG received the Final Regional Determination from HCD. On November 7, 2019, SCAG Regional Council approved a Draft RHNA Allocation Methodology for HCD's review. The Regional Council approved the Final RHNA Methodology on March 5, 2020, and released the Draft RHNA Allocation by jurisdictions.¹² The RHNA underwent Appeals Board Hearings throughout January 2021. In February 2021, the RHNA Appeals Board concluded its determination of appeals and issued the proposed final RHNA Allocation Plan and recommended the Plan for approval by SCAG's Community, Economic & Human Development (CEHD) Committee and Regional Council.¹³ The final 6th Cycle RHNA methodology and allocations were adopted by the Regional Council on March 4, 2021, and approved by HCD on March 22, 2021. As part of the RHNA draft allocations, the city's allocation of housing between October 2021 and October 2029 is 3,341 units.¹⁴

Consistent with the state housing law, the primary objectives the 6th Cycle RHNA allocation plan are:

- Increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- Promote infill development and socioeconomic equity, the projection of environmental and agricultural resources, and the encouragement of efficient development patterns
- Promote an improved interregional relationship between jobs and housing
- Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution
- Affirmatively furthering fair housing

Local jurisdictions are required to plan and zone to accommodate their respective RHNA allocation (housing units) by income categories through the process of updating the Housing Elements of their General Plans. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and housing unit growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, addresses social equity, and fair share housing needs.

Los Angeles County General Plan

Provisions of the Los Angeles County General Plan apply to unincorporated areas of Los Angeles County, including the SOI for Culver City analyzed in this PEIR.

¹² Southern California Association of Governments, 2023. Regional Housing Needs Assessment. <https://scag.ca.gov/rhna>. Accessed April 2023.

¹³ Southern California Association of Governments, 2021a. 6th Cycle RHNA Appeals Timeline, posted online on February 9, 2021. <https://scag.ca.gov/sites/main/files/file-attachments/anticipated-scag-6th-cycle-rhna-appeals-timeline.pdf?1612908970>. Accessed April 2023.

¹⁴ Southern California Association of Governments, 2021b. SCAG 6th Cycle Final RHNA Allocation Plan. Approved on March 22, 2021, and modified on July 7, 2021.

Local

Culver City Zoning Code

Title 17, *Zoning Code*, of the City's Municipal Code contains development standards that regulate the type, location, density, and scale of residential development. The Zoning Code serves to implement the General Plan and the development standards are designed to protect and promote the public health, safety, comfort, convenience, and general welfare of residents. The Zoning Code also helps to preserve the character and integrity of existing neighborhoods.

4.13.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to population and housing if the project would:

- Threshold POP-1:** 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).
- Threshold POP-2:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Methodology

The population growth projections provided in this section use the year 2020 as the baseline, while the housing and employment growth projections use the year 2019. Therefore, 2019 serves as the baseline year for housing and employment growth, and 2020 serves as the baseline year for population growth. Although the Housing Element determined that, as of 2020, the number of housing units in the City was 17,819 units, the 2019 baseline year projection for housing units used throughout the analysis is 17,010 units. While less than the number used in the Housing Element, this provides a worst-case scenario to analyze growth and is a more conservative analysis.

The General Plan 2045 has a year 2045 horizon; however, the General Plan 2045 does not speculate when the development projections would occur, as long-range demographic and economic trends are difficult to predict. The designation within the General Plan 2045 of a site for certain use (as depicted in Figure 2-6, *Draft General Plan Land Use Map*, in Chapter 2, *Project Description*) does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development will depend on property owner initiative. For the purposes of this PEIR, the environmental analysis assumes that sites would be developed or redeveloped with the designated land use by the 2045 horizon year.

With much of the city currently "built out," or developed, undeveloped land available for development is limited in Culver City. The General Plan 2045 includes updated land use

designations, as described in Section 4.10, *Land Use and Planning*, of this PEIR, which would be implemented by the Zoning Code Update as part of a strategy to enable development of walkable mixed-use activity centers and corridors. Major land use changes are planned to take place as opportunities for infill development result in provision of a wider range of housing, employment, and recreational uses to meet the needs of families, young people, senior citizens, and residents of all incomes. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the city's commercial corridors through parking management strategies, active street frontage guidelines, and public realm improvements. To support the community's housing vision, the land use vision allows for new residential and mixed-use development within the city's industrial areas.

Project Impact Analysis

Induce Unplanned Population Growth

Threshold POP-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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).

Impact Statement POP-1: The Project would accommodate regional growth in an orderly manner for the next 25 years and would result in a less significant impact related to inducing unplanned population growth.

General Plan 2045

According to SCAG projections, which do not account for the anticipated growth in the General Plan 2045, by 2045, the population in Culver City is anticipated to increase to 41,600 residents, the number of housing will increase to 18,000 units, and employment will increase to 64,100 jobs.¹⁵ As shown in Table 2-3, *General Plan 2045 Population, Household, and Job Growth Projections*, in Chapter 2, *Project Description*, the existing population in Culver City would increase from 40,800 to 62,400, the existing housing units would increase from 17,000 to 28,310, and the existing jobs would increase from 68,040 to 84,300 in 2045. This would translate to a 52.9 percent increase in residents, 66.5 percent increase in housing units, and a 23.9 percent increase in jobs over the next 25 years. The population, housing, and employment projections assumed for the General Plan 2045 are higher than SCAG's 2045 estimates since the Project provides for additional population, housing, and employment capacity not anticipated by SCAG. However, since SCAG projections are based on the existing General Plan land uses, future SCAG planning documents would be updated to reflect General Plan 2045 projections, if the General Plan 2045 is approved, provided in this PEIR.

As mentioned above in Section 4.13.3, *Regulatory Framework*, Culver City has a RHNA allocation of 3,341 new units, which is a 17-fold increase from the 5th housing element cycle (185 units for

¹⁵ Southern California Association of Governments, 2020c. Final Connect SoCal Demographics and Growth Forecast. Adopted September 3, 2020.

2014–2021 and 3,341 units for 2021–2029).¹⁶ Recognizing that market trends are difficult to predict, RHNA numbers, which are allocated every eight years and are subject to change in the future, and growth is not a linear process, the General Plan 2045 anticipates the development of 12,700 units between 2019 and 2045. New residential opportunities would be a result of targeted residential and mixed-use development in activity centers and along commercial corridors to provide housing near jobs, neighborhood amenities, and health care facilities. This type of infill development would focus on redevelopment and revitalization of areas already served by infrastructure and would not require extensions of roads or other infrastructure. Additionally, the General Plan 2045 policies seek to provide housing that meets the diverse needs of Culver City’s growing population while preserving existing neighborhoods (Policy LU-1.2, Goal LU-2 and associated policies, Policies LU-11.2, LU-11.7, LU-13.4), as well as ensure that public facilities, services, and infrastructure maintain a level of service that supports a high quality of life for all residents (Policy LU-18.1).

As discussed in Section 4.13.2, *Environmental Setting*, existing land uses within the SOI are designated as open space, comprised of the IOF and West Los Angeles College, as well as a cemetery, and do not include any housing. Under the General Plan 2045, no significant land use changes would occur in the SOI and thus, would not generate any additional population or housing within the Planning Area.

Table 4.13-3, *Culver City Jobs-Housing Ratio*, shows the jobs to housing ratio for the baseline year of 2019 and the planning horizon year of 2045.

**TABLE 4.13-3
 CULVER CITY JOBS-HOUSING RATIO**

	2019	2045	Percent Change
Housing Units	17,000	29,710	75%
Jobs	68,040	84,300	24%
Jobs to Housing Ratio	4.00	2.84	-29%

SOURCE: Raimi + Associates, Preferred Plan Growth Projections. November 2022.

As stated in Section 4.13.2, *Environmental Setting*, a high ratio of jobs to housing indicates a housing shortage as there is not enough housing to accommodate all workers, resulting in overcrowding and increased traffic congestion from longer commutes. Based on the SCAG housing and employment growth estimates, the jobs to housing ratio is predicted to decrease over the next 25 years to 2.99, which indicates improved housing conditions in the city. While an increase in employment opportunities within the Planning Area is expected during the 2045 planning horizon, the city has adequate capacity to meet the current RHNA allocation for housing in all household income categories. In addition, policies and programs in the General

¹⁶ Culver City, 2022b. Housing Element. Appendix B: Residential Sites Inventory. <https://www.pictureculvercity.com/housing-element>. Accessed March 2023.

Plan 2045 would ensure that housing needs, including future housing needs for the projected increase in employment, would be met.

The IOF is planned to be phased out. However, due to decommissioning activities, no impacts to employment are anticipated.

By virtue of the fact that the General Plan 2045 is the long-range blueprint for growth and development in the city, the population growth (both in housing and employment) anticipated to occur as a result of the Project would be considered planned growth. The General Plan 2045 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth (see also Section 4.9, *Hydrology and Water Quality*; Section 4.14, *Public Services*; Section 4.15, *Recreation*; Section 4.16, *Transportation*; and Section 4.18, *Utilities and Service Systems*). Moreover, because the city has supported urban growth and development for more than 100 years and is served with infrastructure (e.g., roads, freeways, railroads, transit, water, sewer, storm drainage, electricity, natural gas, etc.) implementation of the Project would not result in indirect growth. Impacts would be less than significant. As such, the Project would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant.

Zoning Code Update

Title 17, *Zoning Code*, of the City's Municipal Code implements the City's General Plan and provides a precise guide for the physical development of the city, consistent with the goals and policies of the General Plan. As such, the Zoning Code Update would not result in unplanned direct or indirect population growth and impacts would be less than significant.

Future expansion of City services has been planned for in the General Plan 2045 to accommodate expected growth and therefore would not be expected to allow for indirect unplanned growth. Future development would be reviewed by the City for compliance with the policies and actions of the General Plan 2045, the Zoning Code Update, and the mitigation measures referenced in other sections of this PEIR and project-specific environmental documentation, further ensuring that unplanned direct or indirect population growth would not occur and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Land Use and Community Design Element

Goal LU-1: Transit-oriented communities. Transit-oriented communities within a half mile of high-quality transit mix well-designed development, affordable housing, community services, and improved mobility options.

LU-1.2: Mix of uses. Encourage more mixed use and affordable housing to support a regional jobs and housing balance, to promote walk-to-work options, and to incorporate public and neighborhood-service uses.

LU-1.5: Mobility hubs at transit stations. Create mobility hubs at the Metro rail stops.

Goal LU-2: Housing opportunity and equality. A diverse range of housing options create equitable opportunities for people of all ages, races/ethnicities, abilities, socio-economic status, genders, and family types to live in Culver City.

LU-2.1: Inclusionary housing provisions. Expand the City's Mixed Use Ordinance incentive program to all mixed use and multifamily residential General Plan Land Use Designations and Zoning Districts.

LU-2.2: Special needs and supportive housing. Support special needs and supportive housing through development incentives and development fee deferrals.

LU-2.3: Workforce housing program. Partner with large employers, residential developers, and/or the Culver City Unified School District to create housing opportunities via the development of housing units, contribution of land, or provision of funding for workforce housing.

LU-2.4: Equity homeownership models. Explore expanded use of shared equity homeownership models, including a community land trust, to increase home ownership.

LU-2.5: Amenity space for physical activity/healthy living in multifamily development. Encourage new multifamily housing development to provide amenity spaces (e.g., gyms, active spaces, outdoor open space, flex working spaces, etc.) which promote physical and healthy living options. Create incentives for developments to make such amenities available to the public so that they can benefit the neighborhood.

LU-2.6: Walkable connections in multifamily development. Encourage new multifamily developers to provide convenient, walkable connections to nearby trails, transit, and open space to promote active lifestyles.

- Place building lobbies adjacent to sidewalks and encourage multiple lobbies in larger projects.
- Locate required bicycle parking at the ground floor and convenient to sidewalk entrances.

LU-11.7: Neighborhood compatibility. Require new development to be compatible and well-integrated with existing residential neighborhoods, maintaining smooth transitions in scale, form, and character through building setbacks, step backs, and rear landscaping.

LU-13.4: Housing for all needs. Facilitate housing for seniors, special needs groups, including the developmentally disabled, and non-traditional family groups by requiring a diverse range of housing configurations that are Americans with Disabilities Act compliant and flexible.

LU-18.1: Adequate infrastructure and utilities. Ensure adequate infrastructure and utility services (electricity, water, internet) for all future development and when feasible, underground utilities (new and existing) to enhance the public realm.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts related to inducing unplanned population growth.

Require Construction of New Housing

Threshold POP-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Impact Statement POP-2: The Project would increase the overall number of dwelling units in the city as well as include policies that seek to ensure equity and protect diversity in Culver City's communities and would therefore, result in a less than significant impact related to requiring construction of new housing as a result of displacing substantial numbers of existing people or housing.

General Plan 2045

The Project would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. A substantial portion (approximately 22.9 percent) of developed land in the Planning Area consists of single-family residential uses, which are not anticipated to undergo significant land use changes under the Project. Proposed land use designations, as described and discussed in Chapter 2, *Project Description*, of this Draft PEIR, would introduce greater flexibility of uses, such as mixed-use, and allow residential uses in more areas of the city, including within industrial areas of the city. New mixed-use designations in activity centers and along commercial corridors would also enable greater opportunities for future residential development. As such, the Project is projected to increase the overall number of dwelling units and provide additional housing opportunities to serve the diverse needs of the community at various socioeconomic levels.

California Government Code Article 10.6 outlines the state's Housing Element requirements. A housing element must analyze existing and projected housing needs, examine special housing needs within the population, evaluate the effectiveness of current goals and policies, identify governmental and other constraints, determine compliance with other housing laws, and identify opportunities to incorporate energy conservation into the housing stock. The element must also establish goals, policies, and programs to maintain, enhance, and develop housing.

The City Council adopted the Culver City Housing Element 2021-2029 on August 8, 2022, and the Housing Element 2021-2029 was certified by HCD on October 10, 2022.¹⁷ The Land Use Element reflects the new land use designations that allow greater residential densities as described above in order to meet the RHNA obligation for the 2021–2029 housing element cycle. In addition, the Housing Element includes an in-depth analysis of the city's housing stock, past and anticipated trends, and housing needs that inform the element's goals, policies, and programs, which include provisions to conserve and improve the existing housing stock, provide housing

¹⁷ Culver City, 2023. Housing Element Update Timeline. <https://www.pictureculvercity.com/housing-element/#updatetimeline>.

for special needs populations, supply enough new housing to meet the city's fair share of the region's housing need, preserve at-risk affordable housing units, and affirmatively further fair housing opportunities. The General Plan 2045 includes policies that support these objectives, including those that seek to ensure equity and protect diversity in Culver City's communities.

For these reasons, growth anticipated under the General Plan 2045 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan are implemented through the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Furthermore, as the City receives development applications for subsequent development under the Project, those applications will be reviewed by the City for compliance with the policies and actions of the General Plan 2045 and the Zoning Code Update to ensure the displacement of housing or significant need for new housing does not occur. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Community Health and Environmental Justice

Goal CHEJ-5: Quality housing. Culver City maintains a supply of safe and quality housing.

CHEJ-5.1: Housing rehabilitation. Expand maintenance and abatement assistance programs for single (including mobile homes) and multi-family properties of low-income households. Support programs designed to rehabilitate deteriorated units through weatherization, modernization, and elimination of common home pollutants.

CHEJ-5.2: Rehabilitation without displacement. Enforce applicable provisions of the housing and building codes to ensure deteriorated housing units are rehabilitated. If implementing applicable provisions results in housing displacement, then identify opportunities to ensure residents remain housed.

Goal CHEJ-6: Housing and economic uncertainty. Culver City identifies and addresses the root causes of housing and economic injustices and inequities disproportionately experienced by low-income households and residents.

CHEJ-6.1: Equitable housing and economic strategies. Prioritize solutions that directly address the concerns of low-income households and residents.

CHEJ-6.2: Services for unhoused residents. Promote shelter and supportive services for people experiencing homelessness.

CHEJ-6.3: Limited-equity housing. Encourage resident controlled limited-equity ownership, such as limited-equity condominiums, limited-equity cooperatives, and community land trusts.

Land Use and Community Design

Goal LU-2: Housing opportunity and equality. A diverse range of housing options create equitable opportunity for people of all ages, races/ethnicities, abilities, socio-economic status, genders, and family types to live in Culver City.

LU-2.1: Inclusionary housing provisions. Expand the City's Mixed Use Ordinance incentive program to all mixed use and multifamily residential General Plan Land Use Designations and Zoning Districts.

LU-2.2: Special needs and supportive housing. Support special needs and supportive housing through development incentives and development fee deferrals.

LU-2.3: Workforce housing program. Partner with large employers, residential developers, and/or the Culver City Unified School District to create housing opportunities via the development of housing units, contribution of land, or provision of funding for workforce housing.

LU-2.4: Equity homeownership models. Explore expanded use of shared equity homeownership models, including a community land trust, to increase home ownership.

Goal LU-11: Residential neighborhoods. Complete, walkable single, two-family, and three-family residential neighborhoods provide a variety of housing types and forms and allow neighborhood supportive uses that sustain the needs of residents.

LU-11.2: Diversity of housing types. Encourage a variety of housing types to equitably serve varying household types, including, but not limited to, single-family attached and detached units, accessory dwelling units, duplexes, and triplexes.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts related to requiring construction of new housing.

4.13.5 Cumulative Impacts Analysis

The Project would result in less than significant cumulative impacts related to population and housing. The geographic context for the cumulative impacts associated with population and housing is the Westside region of Los Angeles County, which is comprised of the cities of Beverly Hills, Culver City, Malibu, Santa Monica, and West Hollywood as well as the communities of Bel Air, Brentwood, Century City, Hollywood, Marina Del Rey, the Miracle Mile, Pacific Palisades, Playa Vista, Venice, and Westwood.¹⁸ Future development in this portion of the county, including growth anticipated under the Project, would not induce substantial unplanned population growth in the area as future development would have to be consistent the general plans and zoning codes of local jurisdictions in the area, and therefore would not be unplanned. In addition, future development in the Westside region of Los Angeles County, including growth

¹⁸ Los Angeles County Economic Development Corporation, 2023. Westside. <https://laedc.org/thrive-in-la/regions-cities/westside/>. Accessed March 2023.

anticipated under the Project, would not result in the displacement of substantial numbers of existing people or housing as future development would be required to follow existing state law governing relocation of residents. Therefore, the Project would not contribute to cumulative impacts related to population and housing, and cumulative impacts would be less than significant.

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4.14 Public Services

4.14.1 Introduction

This section provides an analysis of the potential environmental impacts on public services associated with implementation of the Project, including potential impacts related to fire protection, police protection, schools, parks, and other public facilities (i.e., City Hall, Transportation Facility, Public Works/Parks Maintenance Yard, Transfer and Recycling Station, and Libraries). The section provides context regarding the existing fire protection services, police protection services, schools, and government facilities in the Planning Area, as well as relevant federal, state, and local regulations and programs.

Parks and recreational facilities are discussed in Section 4.15, *Recreation*, and fire hazards are discussed in Section 4.19, *Wildfire*, of this Draft PEIR.

4.14.2 Environmental Setting

Culver City Fire Department

Stations, Facilities, Staffing, and Equipment

The Culver City Fire Department (CCFD) provides fire protection and emergency services to the entirety of the city. CCFD was founded in 1922 and has since received an Insurance Services Office Class 1 rating and achieved accredited agency status from the Commission on Fire Accreditation International. CCFD provides Paramedic Advanced Life Support Services, Fire Suppression Community Risk Reduction and Education programs to the residents and businesses of the city. As of 2019, CCFD is made up of a total of 79 employees who are housed at three fire stations and three support facilities.¹ Fire Station #1 serves as the CCFD headquarters. Each fire station is equipped with unique equipment and personnel needed to serve the community, with at least 18 sworn personnel on duty at all times.² **Table 4.14-1, *Culver City Fire Department Station Equipment and Personnel***, provides a summary of on-site equipment and accompanying personnel at each station.

Other facilities that serve CCFD are the Community Risk Reduction and Fire Administration offices in City Hall, as well as a 4,965-square-foot Fire Drill Training Facility used for teaching firefighting techniques.³ **Figure 4.14-1, *Culver City Fire Department Fire Stations, Facilities, and Service Areas***, shows all the CCFD stations, support facilities, and service areas within city boundaries.

¹ City of Culver City, 2020. General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 22.

² Culver City Fire Department, 2019b. Community Risk Assessment, Standards of Cover. <https://www.culvercity.org/home/showdocument?id=17458>. Accessed March 2023.

³ Culver City Fire Department, 2023. Stations and Facilities. <https://www.culvercityfd.org/About-the-Department/Stations-and-Facilities>. Accessed March 2023.

**TABLE 4.14-1
 CULVER CITY FIRE DEPARTMENT STATION EQUIPMENT AND PERSONNEL**

Location	Apparatus	Staff	Equipment
Station 1 (Headquarters)	Engine Company	Captain, engineer, firefighter	Engine, life support medical equipment, emergency scene lighting, defensive hazardous materials mitigation tools, water rescue equipment, rehab supplies, 50 ft of ground ladders, wildland firefighting equipment, forcible entry tools, automobile extraction equipment, and thermal imaging camera
	Paramedic Resources	2 firefighter/paramedics with ALS certification	Advanced life support equipment, basic life support equipment, airway/ventilation equipment, vascular therapy supplies, monitor/defibrillators
	Battalion Chief Command Vehicle	Battalion chief	Communication equipment, mobile data computer, command desk
Station 2	Engine Company	Captain, engineer, firefighter	Engine, life support medical equipment, emergency scene lighting, defensive hazardous materials mitigation tools, water rescue equipment, rehab supplies, 50 ft of ground ladders, wildland firefighting equipment, forcible entry tools, automobile extraction equipment, and thermal imaging camera
	Ambulance	2 EMTs	Basic life support equipment
Station 3	Engine Company	Captain, engineer, firefighter	Engine, life support medical equipment, emergency scene lighting, defensive hazardous materials mitigation tools, water rescue equipment, rehab supplies, 50 ft of ground ladders, wildland firefighting equipment, forcible entry tools, automobile extraction equipment, and thermal imaging camera
	Paramedic Resources	2 firefighter/paramedics with ALS certification	Advanced life support equipment, basic life support equipment, airway/ventilation equipment, vascular therapy supplies, monitor/defibrillators
	Engine Company	Captain, engineer, 2 firefighters	Aerial ladder truck, 100 ft mounted extension ladder, 200 ft of ground ladders, rescue, and automobile extraction equipment

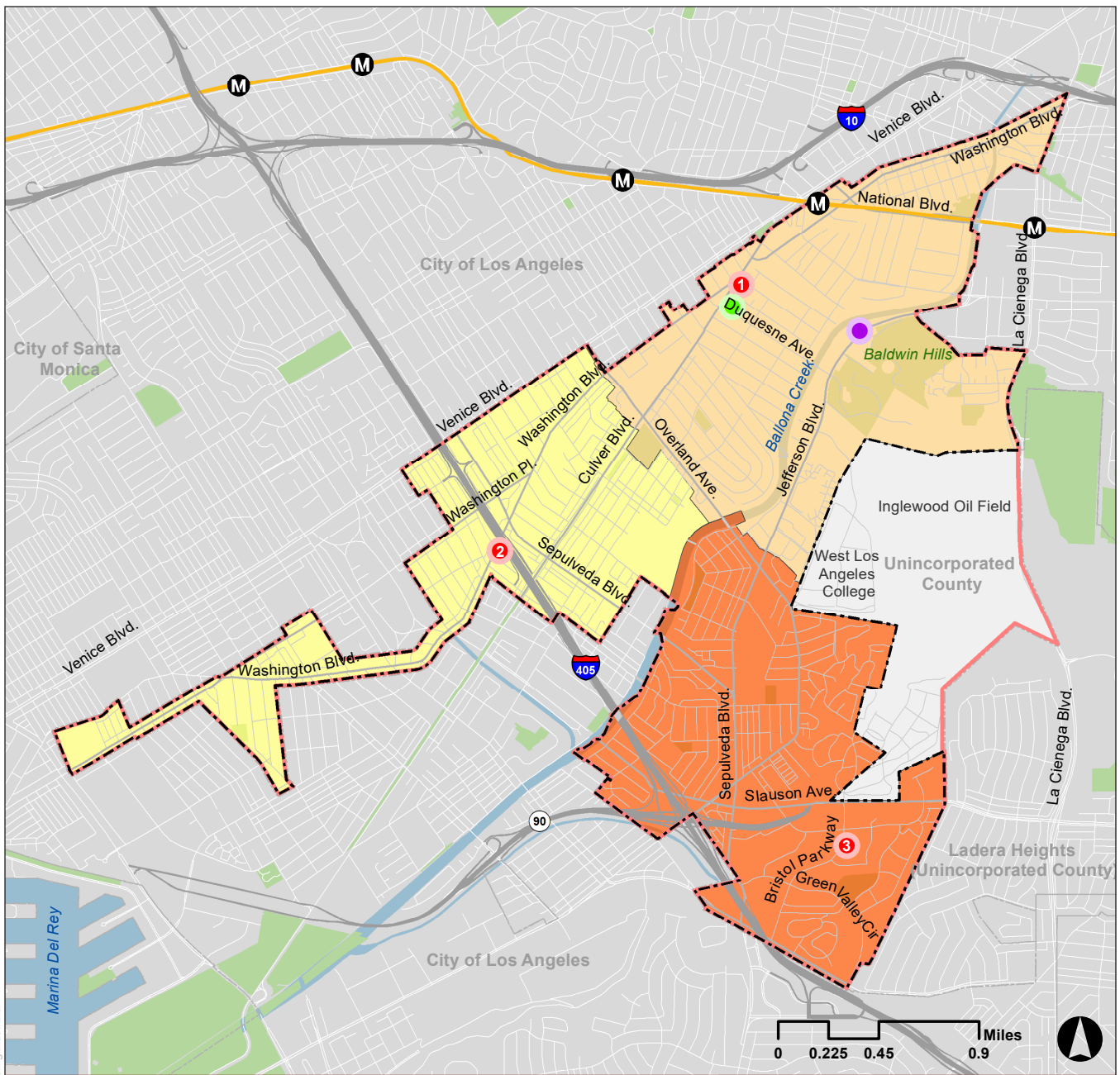
SOURCE: Culver City Fire Department. Stations and Facilities. <https://www.culvercityfd.org/About-the-Department/Stations-and-Facilities>. Accessed March 2023.

CCFD is supported, when needed, through mutual aid agreements with the fire departments in the City of Los Angeles and Los Angeles County, with further assistance from the cities of Beverly Hills, Santa Monica, and West Hollywood.⁴ CCFD in combination with these other supporting fire departments provide fire protection services for the entire Planning Area.

Fire Hazards

The Planning Area is classified as a Local Responsibility Area (LRA) for fire hazards, meaning that a City or County is financially responsible for wildfire suppression. CCFD would provide fire protection services related to wildfires. An analysis of potential impacts related to wildfires is provided in Section 4.19, *Wildfire*, of this Draft PEIR.

⁴ City of Culver City, 2020. General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Fire Station
- Community Risk Reduction office and Fire Administration
- Fire Drill Training Facility
- Fire District 1
- Fire District 2
- Fire District 3

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

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Figure 4.14-1
Culver City Fire Department Fire Stations,
Facilities, and Service Areas



CCFD Emergency Response Time

For each type of emergency response call, including fire suppression, wildland fire, emergency medical services (EMS), technical rescue, and hazardous materials emergency response calls, CCFD has established response time performance standards for high risk, moderate risk, and low risk incidents. These standards are described as benchmark performance objectives. Aggregate response times for CCFD are reported using the 90th percentile of the total response time performance per National Fire Protection Association and Commission on Fire Accreditation International standards. Total response time is comprised of three components including alarm handling time, the amount of time between a dispatcher receiving a 911 call and alerting fire station staff; turnout time, the amount of time between a station receiving an alert and being en route to an incident; and travel time, the amount of time it takes to drive from the fire station to the incident location.

The first-arriving unit is the first unit to arrive at the incident and generally has the responsibility of establishing command at the scene, evaluating the need for additional resources, and providing initial emergency response services. The effective response force (ERF) includes the total number of personnel necessary to address an emergency and/or terminate an incident. CCFD has differing staffing and capability requirements for the first-arriving unit and ERF dependent on incident type.

Table 4.14-2, CCFD Response Times, shows CCFD response time goals for 90 percent of the time and the five-year aggregate response times from 2014 to 2018.

**TABLE 4.14-2
 CCFD RESPONSE TIMES**

Incident Type	CCFD Goal^a	Aggregate 2014–2018 Response Time^b
High Risk Fire Incident		
First Due-In Unit	7:00	10:16
ERF	14:00	N/A
Moderate Risk EMS Incident		
First Due-In Unit	6:20	8:10
ERF	9:50	10:26
Moderate Risk Technical Rescue Incidents		
First Due-In Unit	7:30	9:40
ERF	12:00	N/A
Moderate Risk Hazardous Materials Incident		
First Due-In Unit	8:00	10:02
ERF	9:00	N/A

NOTES: N/A = not applicable.

SOURCES:

^a Commission on Fire Accreditation International, 2019. Accreditation Report, Culver City Fire Department, pages 25 to 31. <https://www.culvercityfd.org/files/sharedassets/fire/culvercityfdaccreditationr.pdf>. Accessed April 2023.

^b Culver City Fire Department, 2019b. Community Risk Assessment: Standards of Cover, pages 88 to 97. <https://www.culvercity.org/home/showdocument?id=17458>. Accessed March 2023.

Though CCFD was able to meet certain response time goals for particular call response types in some years, as shown in Table 4.14-2, their 90th percentile aggregate response time performance for the years 2014–2018 did not meet its overall benchmark response time goals for any emergency response call type.

Mutual Aid Agreements

As described above, CCFD has established mutual aid agreements with the City of Los Angeles, Los Angeles County, and other local municipalities, to increase response levels of service to residents of the city as well as surrounding areas, if aid were needed. CCFD and these neighboring agencies have shared standard operating procedures and regularly participate in joint training programs.⁵

Also, the Planning Area is located within the Los Angeles County Operational Area, which is located within mutual aid Region I of the Emergency Mutual Aid Regions established by the California Office of Emergency Services (OES) and is part of the OES Southern Administrative Region. Mutual aid in Los Angeles County is divided into mutual aid assistance "areas," of which the city is a part of Area A. Other jurisdictions that are included within Area A for mutual aid assistance are Beverly Hills, Santa Monica, and West Hollywood.⁶

Existing Deficiencies

CCFD faces several challenges related to growth in the city. These challenges relate to increased hazards within the city, resource limitations, meeting response time goals, as well as increased calls for service due to population growth.

Eastern portions of the city including the Blair Hills neighborhood and the northeastern section of the Blanco/Culver Crest neighborhood, as well as larger portions of the city's Sphere of Influence (SOI), are classified as Very High Fire Severity Zones.⁷ These areas are known as a wildland-urban interface (WUI). WUIs are areas where fires that start are dominated by brush or wildland vegetation and have the potential to spread to nearby homes and developments, threatening public safety and property.⁸

It is anticipated that changing climate patterns will result in increased severity and frequency of fires in the California region. This change could pose a threat to some residents, which may in turn increase demand on CCFD services to respond to these types of incidents.

Another area of concern for CCFD relates to "concurrent runs," which occur when emergency equipment is not available because it is deployed and in use for a prior call for service. Though CCFD attempts to reduce resource consumption by having the first responders cancel unneeded

⁵ City of Culver City, 2020. General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26.

⁶ City of Culver City, 2020. General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26.

⁷ California Department of Forestry and Fire Protection, 2011. Very High Fire Hazard Severity Zones in Local Responsibility Areas (Culver City). September 2011.

⁸ City of Culver City, 2020. General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 27.

resources, increased calls for service due to population growth increases the likelihood of concurrent runs and consequent resource limitations. Another aspect that depletes available emergency response resources is transportation to hospitals outside of city limits, and subsequent travel back. According to CCFD, approximately 70 percent of transports are taken outside the city and require travel on major arterials and freeways. Traffic congestion along these routes increases travel times and reduces emergency equipment available in the event of a subsequent emergency.⁹

CCFD's ability to meet response time standards is reduced as a result of increased emergency call volumes, increased traffic and congestion, and accessibility difficulties related to topographic conditions in certain areas of the city. Baldwin Hills is an area of concern for CCFD due to its topography and the IOF, which make it difficult to access, slowing response times.¹⁰

CCFD recognizes that as population increases, the number of emergency incidents, especially EMS calls, will also increase. The city's population has a greater percentage of residents over the age of 55 as compared to Los Angeles County as whole, which could also be a contributing factor to increases in emergency incidents. This increase in service demand may require additional emergency personnel staffing in the future.

Finally, CCFD makes use of Opticom systems to control traffic and provide green lights to emergency vehicles; however, this traffic control technology is outdated. If upgrades were made to the system, CCFD would increase their response time performance.¹¹

Los Angeles County Fire Department

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services to the city's SOI. LACFD services about 2,300 square miles, including 60 cities and unincorporated communities, and serves approximately 4.1 million residents. There are 4,700 total personnel working within the Fire Department's emergency and business operations bureaus, including firefighters, dispatchers, lifeguards, nurses, and administrative support. In 2020, LACFD responded to approximately 379,500 emergency dispatch calls, of which over 9,800 (2.6 percent) were fire incidents. A vast majority (about 307,000 calls, or 80.9 percent) were for emergency medical services (EMS).¹²

According to the 2021 Department Overview Booklet, LACFD's fire and rescue resources include 177 fire stations, 228 engine companies, 112 paramedic units, and 34 truck companies. Specialized resources include three hazardous materials squads, six swift water rescue units, two urban search and rescue squads, two fire boats, and additional specialized equipment. The Air and Wildland Division also maintains a fleet of ten helicopters for paramedic transport, hoist rescues, and wildland firefighting, and contract aircraft are also available during wildfire season.

⁹ Ibid

¹⁰ Ibid

¹¹ CCFD personal communication, 2019. Public Services, Infrastructure and Smart Cities Stakeholder Meeting with City Staff. September 3, 2019.

¹² Los Angeles County Fire Department, 2021. Department Overview Booklet. https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet_single-pages_9.09.21-A.pdf. Accessed April 2023.

LACFD is also home to California Task Force 2 (also known as USA Task Force 2), which is an urban search and rescue team that is qualified to respond to local, national, and international disasters.

Calls for emergency response are answered by nearly 100 dispatchers who dispatch units to approximately 400,000 incidents annually.¹³ LACFD follows national guidelines that require a five-minute response time for first-arriving fire and EMS units and eight minutes for paramedic units in urban areas, as well as an eight-minute response time for first-arriving fire and EMS units and 12 minutes for paramedic units in suburban areas.

The city's SOI is part of Division VII of the LACFD and is located within the service area of LACFD Station 58, located at 5757 Fairfax Avenue within the city of Los Angeles.¹⁴

Police Protection

Culver City Police Department

Police protection for the city is provided by the Culver City Police Department (CCPD), which is responsible for providing visible patrol, preliminary criminal investigations, follow-up investigations, traffic accident investigations, and specialized investigations of crimes such as identify theft, vice offenses, and similar crimes. CCPD promotes community safety through deterrence and prevention of crime, apprehension of offenders, and education of the public in self-protective measures to minimize victimization. Additionally, CCPD collaborates with the Los Angeles County Sheriff's Department (LASD), when needed, for large scale police related emergencies. CCPD, along with several other local cities, contracts with the South Bay Regional Public Communications Authority for dispatch services.

CCPD is staffed with two full time K-9 units, an Emergency Response Team (ERT), a Crisis Response Team (CRT), a Mental Health Evaluation Team (MET), and a Partnership in Policing Team (PIP). In addition, CCPD provides neighborhood and business watch programs to prevent criminal activities, which involve the PIP team. Crime patterns are routinely analyzed and dispersed to patrol officers and special crime suppression units. Monthly reports are prepared and made public that identify monthly statistics and information related to crime and arrests, staffing, parking and traffic citations and traffic collisions.

CCPD has 109 sworn officers and 52 professional staff that serve an area of approximately 5 square miles with a residential (nighttime) population of approximately 40,000, and a daytime population of 300,000+.^{15, 16, 17} **Table 4.14-3, CCPD Population, Officer, and Crime Comparison**

¹³ Los Angeles County Fire Department, 2021. Department Overview Booklet. https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet_single-pages_9.09.21-A.pdf. Accessed April 2023.

¹⁴ County of Los Angeles, 2023. LACoFD Fire Station Boundaries. Updated January 24, 2023. <https://geohub.lacity.org/datasets/lacounty::lacofd-fire-station-boundaries-feature-layer-/explore?location=33.993802%2C-118.387710%2C14.25>. Accessed April 2023.

¹⁵ Culver City Police Department, 2023a. About CCPD. <https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD>. Accessed May 2023.

¹⁶ Culver City Police Department, 2023b. 2023- Quarter 1 Report.

¹⁷ Daytime population is the number of people in a city during the day, including commuters and tourists. Nighttime population is the number of people who live in a city, typically residents.

(2023), provides a summary of the population, sworn officers, officer to population ratio, annual report crimes, and crimes per 1,000 population for both the daytime population and the residential (nighttime) population. As shown in Table 4.14-3, Based on the number of sworn officers provided in the 2023 Quarter 1 Report published by CCPD, the City has an officer to daytime population ratio of approximately 1:2,752 and a nighttime officer to population ratio of approximately 1:367.

**TABLE 4.14-3
 CCPD POPULATION, OFFICER, AND CRIME COMPARISON (2023)**

	Population	Sworn Officers	Officers/ Population Ratio	Annual Reported Crimes	Crimes per 1,000 Population
Daytime Population	300,000+	109	1/2,752 ^a	2,684 ^b	7.1 ^c
Residential (nighttime) Population	40,000	109	1/367 ^d	2,684 ^b	53.3 ^e

NOTES:

^a 300,000+ daytime population/109 officers = 2,752 residents/1 officer.

^b Crime data is provided for Quarter 4 of 2022 (the latest whole year for which annual crime data was available).

^c 2,684 crimes/300,000 daytime population = 0.0071 x 1,000 = 7.1 crimes per 1,000 daytime population.

^d 40,000 residential (nighttime) population/109 officers = 367 residents/1 officer.

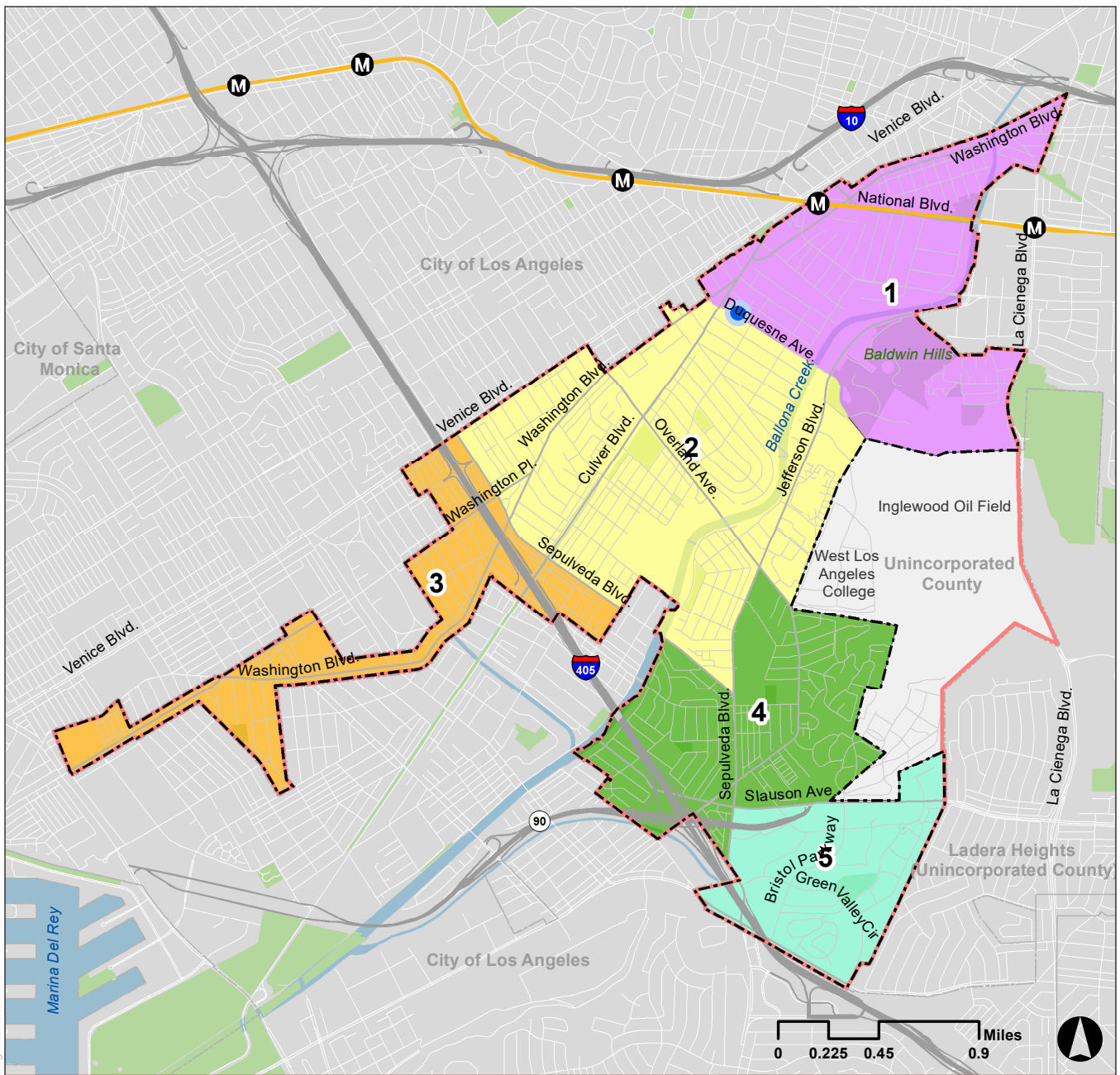
^e 2,684 crimes/40,000 residents = 0.0533 X 1,000 = 53.3 crimes per 1,000 residents.

SOURCE: ESA, 2023.

As shown in **Figure 4.14-2, Police Stations within the Planning Area**, CCPD is divided into five patrol districts and has one station located at 4040 Duquesne Avenue. The most current average response time documented in the CCPD December 2021 Monthly Report was 4 minutes and 18 seconds for emergency calls and 9 minutes and 36 seconds for non-emergency calls.¹⁸

Table 4.14-4, Culver City 2022 Crime Statistics, identifies crimes reported in the city in 2022 (the latest annual crime statistics). The crime statistics are based on the National Incident-Based Report System (NIBRS). As of January 1, 2021, the Federal Bureau of Investigation (FBI) made the nationwide implementation of NIBRS a top priority to provide more useful statistics to promote constructive discussion, measures, and informed policing. NIBRS establishes a new baseline that more precisely captures reported crime in a community.

¹⁸ Culver City Police Department, 2021. Monthly Report. December 2021. <https://www.culvercitypd.org/files/assets/police/documents/monthly-reports/december-2021.pdf>. Accessed April 2023.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Culver City Police Station
- Car District 1
- Car District 2
- Car District 3
- Car District 4
- Car District 5



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

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Figure 4.14-2
Police Stations within the Planning Area



**TABLE 4.14-4
 CULVER CITY 2021 CRIME STATISTICS**

Crime Type	Number	Percent of Culver City Crime^a
Murder	0	0%
Homicide	0	0%
Rape/Sexual Assault	26	1%
Aggravated Assault	144	5%
Simple Assault	243	9%
Kidnapping	11	0%
Human Trafficking	0	0%
Robbery	114	4%
<i>Subtotal Violent Crime</i>	<i>538</i>	
Burglary	280	10%
Larceny/Theft	1,590	59%
Motor Vehicle Theft	264	10%
Arson	12	0%
<i>Subtotal Property Crime</i>	<i>2,146</i>	
Total	2,684	

^a Percentages are rounded.
 SOURCE: Culver City Police Department, 2021. Monthly Report. December 2021.

As indicated in Table 4.14-4, a total of 2,684 violent and property crimes were reported in Culver City in 2021. No homicides were reported in the city in 2022. It should be noted that in 2022, 2,146 (or approximately 79 percent) of the reported crimes were property crimes (burglary, larceny/theft, motor vehicle theft, and arson), compared to the 538 (or approximately 19 percent) reported violent crimes (assault, kidnapping, robbery, etc.). Based on these numbers, and as shown above under Table 4.14-3, Culver City has an existing annual crime rate of approximately 7.1 crimes per 1,000 daytime population of 300,000+ people. In addition, as also shown in Table 4.13-3, based on a residential (nighttime) population of approximately 40,000, Culver City has an existing annual crime rate of approximately 53.3 crimes per 1,000 residential (nighttime) population.

Los Angeles County Sheriff’s Department

Los Angeles Community College District (LACCD) contracts with LASD to provide college law enforcement services at West Los Angeles College (WLAC), located within the City’s SOI. The WLAC Sheriff’s Department has authority to apprehend and arrest individuals involved in illegal activity on the campus and areas immediately adjacent to the campus. The WLAC Sheriff Station is located on the western portion of the campus along Freshman Drive and includes one LASD team leader and two LASD deputies.¹⁹ In addition to assigning its own officers to the WLAC

¹⁹ West Los Angeles College, 2021. 2021 Annual Security Report – West Los Angeles College, pg. 18. <https://www.wlac.edu/sites/wlac.edu/files/2022-08/2021AnnualSecurityReport.pdf>. Accessed April 2023.

Campus, the WLAC Sheriff Department/Vice President of Administrative Services supervised a corps of LACCD police cadets from January 2020 through April 2020. Police cadets provide college paraprofessional administrative support and parking enforcement. In 2020, there were no crimes reported on campus, off campus, or on public property.²⁰

Parks and Recreation Facilities

Please see Section 4.15, *Recreation*, of this Draft PEIR, for information pertaining to parks and recreation facilities.

Schools

Culver City Unified School District

The city is served by Culver City Unified School District (CCUSD), which offers public school programs from preschool and K–12, as well as adult education courses. CCUSD is comprised of five elementary schools, one middle school, one high school, one independent learning academy, and one adult education school.²¹

There are also six private elementary schools including Echo Center, Echo Horizon, Pacifica Montessori, Park Century Elementary, Willows Community School, and Turning Point School. Further, the Exceptional Children's Foundation (ECF) Kayne Eras Center and STAR Prep Academy offer private education opportunities to city students in grades K–12. There are a variety of higher education institutions located in the Planning Area including Antioch University Los Angeles, Otis, and WLAC.

Capacity and Enrollment

Enrollment varies at each of the CCUSD campuses, with the highest number of students enrolled in Culver City High School (CCHS). Student enrollment for the 2022–23 school year at each CCUSD school is shown in **Table 4.14-5, *Capacity of CCUSD Schools***. Attendance areas for El Rincon, Farragut, La Ballona, and Linwood E. Howe are shown in **Figure 4.14-3, *CCUSD Attendance Areas***. Student enrollment at El Marino is open to all residents in the CCUSD attendance area who wish to participate in the school's unique Language Immersion programs. Each of the five elementary schools funnel students into Culver City Middle School (CCMS) for sixth grade through eighth grade, which then leads to enrollment in CCHS for ninth grade through twelfth grade. An alternative independent study program is available for students in grades K–12 through iAcademy (CCUSD iAcademy).

²⁰ West Los Angeles College, 2021. 2021 Annual Security Report – West Los Angeles College, pg. 18. <https://www.wlac.edu/sites/wlac.edu/files/2022-08/2021AnnualSecurityReport.pdf>. Accessed April 2023.

²¹ Culver City Unified School District. 2023c. Our Schools. <https://www.ccusd.org/>. Accessed May 2023.

**TABLE 4.14-5
 CAPACITY OF CCUSD SCHOOLS**

Site	Capacity	2020-2021 Enrollment	2022-2023 Enrollment	Remaining Capacity as of 2022-2023
Culver City Middle School	1,917	1,619	1,583	334
Culver City High School	2,565	2,258	2,155	410
Total Middle and High School Capacity	4,572	3,877	3,738	834
<i>15% Efficiency Adjustment for Middle and High School</i>	<i>-645</i>			
Practical Total Middle and High School Capacity^a	3,927	3,877	N/A	189
El Marino Elementary	826	839	779	47
El Rincon Elementary	645	589	608	37
Farragut Elementary	549	565	560	(11)
La Ballona Elementary	657	560	568	89
Linwood E. Howe Elementary	511	554	559	(48)
Total Elementary School Capacity	3,188	3,107	3,074	114
Total District Capacity	7,115	6,984	6,812	303

^a Practical capacity accounts for the 15% efficient adjustment made for middle and high school capacity.

SOURCE: CCUSD, 2020. Draft Developer Fee Study; California Department of Education, 2020. California Department of Education, 2023.

Overall, enrollment in CCUSD has generally been increasing since the 2013–2014 school year from 6,691 students during the 2013–2014 school year to 6,812 students in the 2022–2023 school year.^{22,23} Although enrollment in CCUSD increased from 2013–2014 to 2018–2019, enrollment has decreased steadily from 2018–2019 to 2022–2023. Enrollment in Los Angeles County as a whole is projected to decrease by approximately 12 percent in enrollment by the 2023–2024 school year and by approximately 19 percent by the 2027–2028 school year.^{24,25}

Capacity

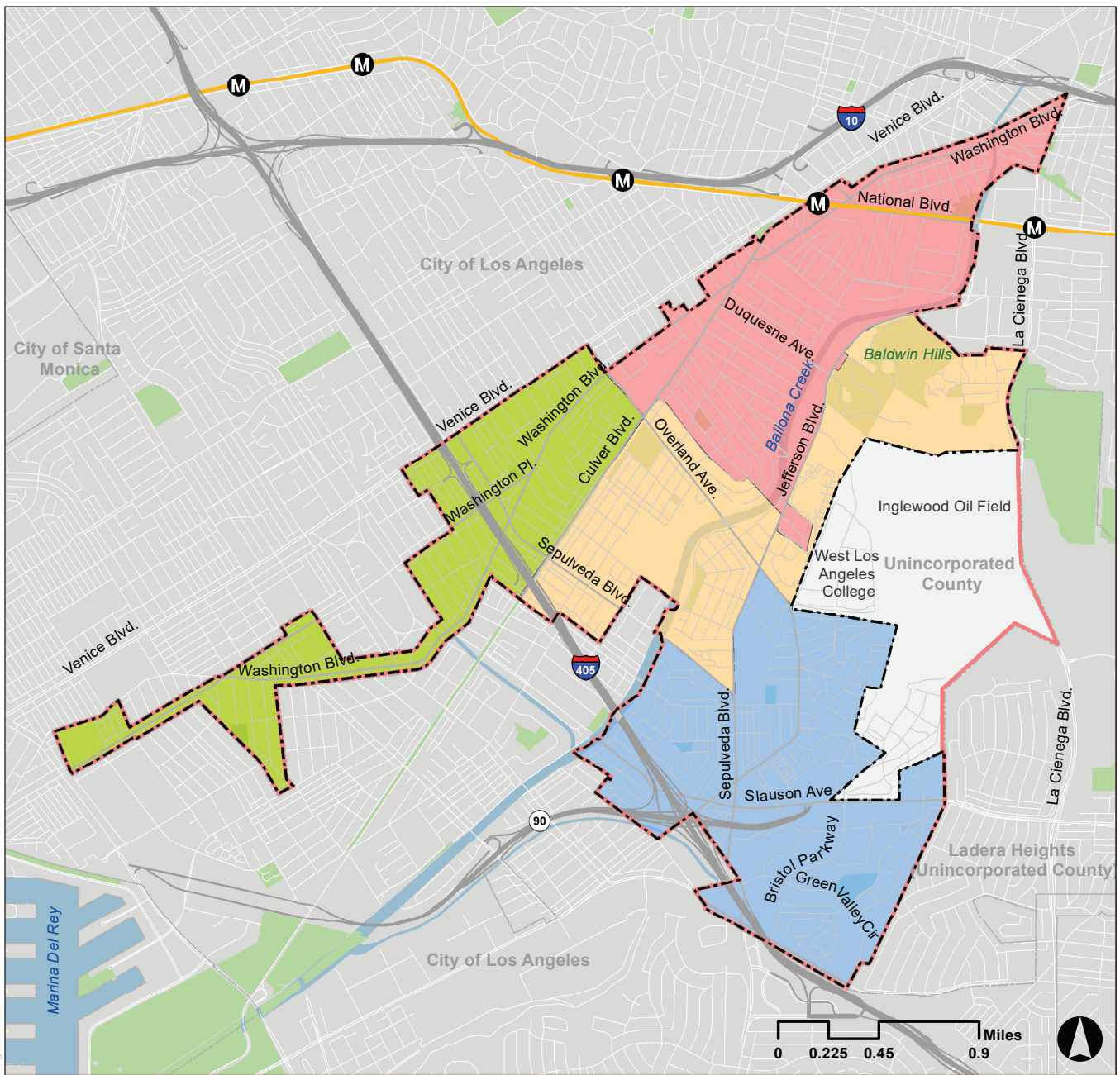
Table 4.14-5, Capacity of CCUSD Schools, shows the existing capacity, enrollment, and remaining capacity in the CCUSD schools. Although CCUSD is in the process of addressing existing deficiencies, including aging facilities and safety concerns in their school facilities, there is currently capacity remaining at all CCUSD schools, except for Farragut Elementary and Linwood E. Howe Elementary.

²² California Department of Education, 2019a. 2018–19 Enrollment by Ethnicity and Grade, Culver City Unified Report. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=1964444&aggllevel=district&year=2018-19>. Accessed March 2023.

²³ California Department of Education, 2014. 2013–14 Enrollment by Ethnicity and Grade, Culver City Unified Report. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=1964444&aggllevel=district&year=2018-19>. Accessed March 2023.

²⁴ California Department of Education, 2019b. 2018–19 Enrollment by Ethnicity and Grade, Los Angeles County Report. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=19&aggllevel=county&year=2018-19>. Accessed March 2023.

²⁵ California Department of Finance, 2022. California Public K–12 Graded Enrollment Projections Table, 2022 Series. <https://dof.ca.gov/forecasting/demographics/public-k-12-graded-enrollment/>. Accessed March 2023.



- | | | | |
|--|----------------------|------------------------------|--------------|
| | City Limits | CCUSD Attendance Area | |
| | Sphere of Influence | | El Rincon |
| | Metro Station | | Farragut |
| | E Line (Expo) | | La Ballona |
| | Major Roads | | Linwood Howe |
| | Local Roads | | |
| | Parks and Open Space | | |
| | Waterbody | | |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

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Figure 4.14-3
CCSUD Attendance Areas



CCUSD has two middle school campuses and one high school campus that are currently not operational due to a decline in enrollment: Betsy Ross and Washington Middle Schools and Culver Park High School. The Middle School campuses are currently under long-term leases and are operated as private schools (Echo-Horizon School and Wildwood School). CCUSD had a third elementary school campus (Linda Vista/Ohr Eliyahu Academy), which was sold to the Westside Children's Center in 1992. The property was redeveloped as the Stoneview Nature Center operated by the State of California's Baldwin Hills Conservancy. The Westside Children's Center (renamed to Allies for Every Child) relocated to the Fox Hills neighborhood of the city.

Government and Other Community Facilities

Government Facilities

Figure 4.14-4, *Government and Civic/Cultural Facilities within the Planning Area*, shows the City-owned government facilities located within Culver City as described below. There are no government facilities located within the SOI.

City Hall. Culver City's City Hall is located at 9770 Culver Boulevard and is a three-story, 75,964-square-foot structure built in 1995 with a two-level parking structure located beneath the building.²⁶ The following City Departments are housed within City Hall:

- Administrative Services
- City Attorney
- City Manager
- Economic Development
- Planning and Development
- Housing and Human Services
- Finance
- Fire Administration & Community Risk Reduction
- Public Works Engineering, Mobility & Traffic Engineering
- Technology

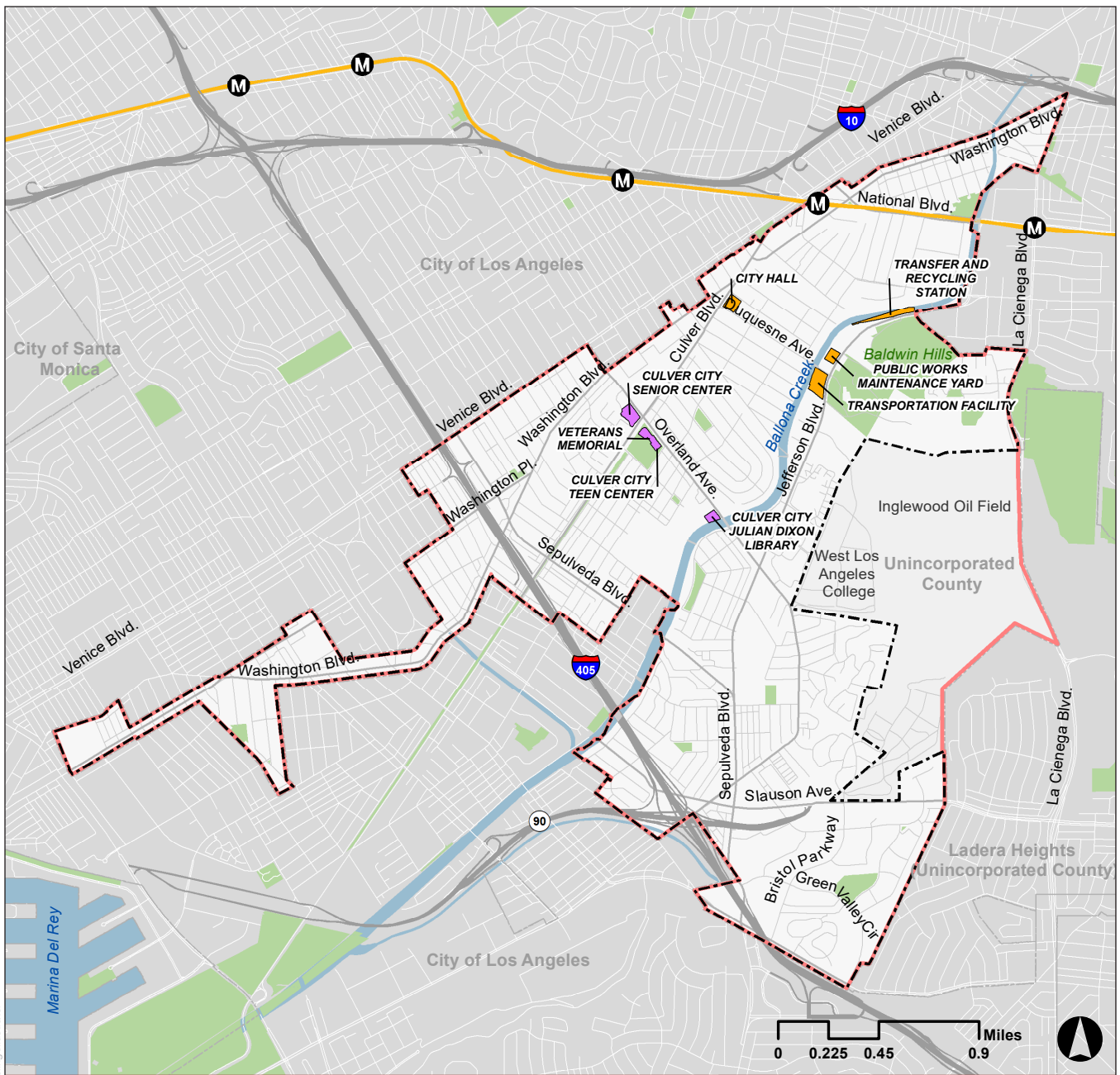
Transportation Facility. This 49,000-square-foot facility is located at 4343 Duquesne Avenue and houses the City's Transportation Department. This facility has been serving the community since 1998.²⁷

Public Works/Parks Maintenance Yard. This 82,112-square-foot facility is located at 9505 Jefferson Boulevard and houses the City's public works and maintenance operations. This facility has been serving the community since 1978.²⁸

²⁶ Faithful and Gould, 2019a. Facility Condition Assessment for Culver City Hall. October 15, 2019.

²⁷ Faithful and Gould, 2019b. Facility Condition Assessment for Culver City Transportation Facility. October 15, 2019.

²⁸ Faithful and Gould, 2019c. Facility Condition Assessment for PW Maintenance Yard. October 8, 2019.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Government Facilities
- Civic and Cultural Facilities



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 4.14-4
Government and Civic/Cultural Facilities
within the Planning Area



Transfer and Recycling Station. This 29,144-square-foot facility is located at 9255 West Jefferson Boulevard and has been serving the city since 1983. It is a processing site for the temporary deposition of waste and recycling and accepts waste from construction and demolition, dry industrial, municipal solid waste, and recyclable materials and organic waste.²⁹

Media Park Renovation. The City has a long-term lease with the City of Los Angeles to improve and operate Media Park adjacent to the Downtown. A proposed conceptual park renovation plan was prepared and shared with the public in April 2021. The plans are still under consideration by the Culver City Council and Los Angeles Department of Parks and Recreation.

Libraries

The Los Angeles County Public Library (LACPL) provides library services to the city through its branch, the Culver City Julian Dixon Library, located at 4975 Overland Avenue as shown in Figure 4.14-4. The Julian Dixon Library, which began as the Culver City Library, was established in 1915 in the Pacific Electric Railroad Depot. Over the years, the library moved to several locations as it grew larger until it came to its current location, where it has been since 1970. The library was renamed the Culver City Julian Dixon Library by the Los Angeles County Board of Supervisors in honor of U.S. Congressman Julian Dixon who represented the 32nd U.S. Congressional District from 1979 to 1993. After being closed for more than a year for renovations, the Culver City Julian Dixon Library re-opened on February 20, 2016.³⁰ The facility is approximately 21,406 square feet in size, with sustainability and energy efficiency features, and includes amenities such as new computers, iPad catalogs, digital signage, new furniture, and a security system.

4.14.3 Regulatory Framework

This section provides the relevant federal, state, regional, and local regulations applicable to the Project.

Federal

Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA) as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure;

²⁹ Culver City, 2016. Americans with Disabilities Act (ADA) Self Evaluation and Transition Plan, PS0061 RFP Number 1590, Addendum No. 1. <https://www.culvercity.org/home/showdocument?id=2339>. Accessed on October 23, 2019.

³⁰ Culver City News, 2016. Dixon Library re-opens after renovation. February 18, 2016. <https://www.culvercitynews.org/dixon-library-re-opens-after-renovation/>. Accessed March 2023.

properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include the following:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

State

California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings,

which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code, building standards based on a national model code that have been changed to address particular California conditions, and building standards authorized by the California legislature but not covered by the national model code. The 2022 edition of the California Building Code became effective on January 1, 2023.³¹ The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas.

Uniform Fire Code

The Uniform Fire Code contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The code contains specialized technical regulations related to fire and life safety.

California Health and Safety Code

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, including regulations for building standards (also set forth in the California Building Code), and fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8, Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Equipment, Cal/OSHA has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials; fire hose size requirements; restrictions on the use of compressed air; requirements for access roads; and guidelines for testing, maintaining, and using all firefighting and emergency medical equipment.

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Air Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

³¹ California Building Code (CCR, Title 24, Part 2).

California Vehicle Code, Section 21806

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.³² This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety ... (c) All pedestrian upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50 percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have “a constitutional obligation to provide adequate fire protection services.”³³ The Hayward ruling also concluded that “assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings” and the “need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.”³⁴

California Governor’s Office of Emergency Services

In 2009, the State of California passed legislation creating the California Governor's Office of Emergency Services (Cal OES) and authorized it to prepare a Standard Emergency Management

³² A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

³³ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 843, 847.

³⁴ *Ibid.*

System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

California Fire Service and Rescue Emergency Aid System

CCFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which Cal OES, Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).³⁵ The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and state levels, and divides the state into six mutual aid regions to facilitate the coordination of mutual aid. CCFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.³⁶

California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

Senate Bill 50 (Chapter 407, Statutes of 1998)

Under Senate Bill (SB) 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities, and payment of these fees is considered full and complete mitigation of the impacts, according to California Government Code Section 65995. However, Government Code Section 65995 limits the power of cities and

³⁵ California Governor's Office of Emergency Services, Fire and Rescue Division, 2023. California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan. Revised February 2023.

³⁶ Los Angeles Fire Department, 2014. Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts. July 3, 2014.

counties to require mitigation of school facilities impacts as a condition of approving new development.

California Education Code

Part 10.5, Chapter 1 School Sites

Sections 17210 to 17224 of the California Education Code governs the evaluation and selection of new sites and additions to existing sites for public schools, and for charter schools seeking state funding for school property acquisition or construction. Section 17211 requires the governing board of a school district to evaluate property proposed for a new school site or addition to an existing site at a public hearing prior to acquisition. Section 17212 requires the governing board of a school district to evaluate expert investigations into all factors affecting the public interest regarding a proposed school site prior to acquisition, including geological and soil engineering studies of such a nature as to preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the building safe for occupancy is economically infeasible. Under Section 17212, the evaluation should also include the site's location in respect to population, transportation, water supply, waste disposal, utilities, traffic hazards, and surface drainage conditions, and other factors affecting the costs of the project. The chapter precludes the selection of a site where hazardous geological or soil conditions, hazardous substances, or proximity to an airport would pose a danger to public health or safety.

Part 10.5, Chapter 3 Construction of Buildings

The California Department of Education (CDE) establishes standards for the selection of school sites pursuant to Education Code Section 17251. In 2000, CDE's School Facilities Planning Division (SFPD) updated the Guide to School Site Analysis and Development, which was originally published in 1966. The guide assists school districts in determining the amount of land needed to meet their educational purposes according to CDE recommendations.

California Public Resources Code Section 21151.8

Public Resources Code Section 21151.8 requires that an EIR or negative declaration for a project involving the purchase of a school site or the construction of a new elementary or secondary school by a school district must include information on potential safety and health hazards to school occupants, including the presence of hazardous waste, hazardous substance release, pipelines, and air quality risks.

Regional

Los Angeles County Fire Code

The County Fire Code consists of fire prevention provisions, development specifications and fuel modification requirements. Fire prevention provisions covered in the County Fire Code include fire apparatus access roads, adequate road widths, all-weather access requirements, fire flow requirements, and fire hydrant spacing. The code also requires clearance of brush around structures located in hillside areas that are considered at risk for wildland fire.

Los Angeles County Operational Area Emergency Response Plan

The County approved an Operational Area Emergency Response Plan in 1998, which was updated in 2012. The plan establishes the County's emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts among the various emergency departments, agencies, special districts, and jurisdictions that make up the County Operational Area. The plan ensures the most effective allocation of resources for the protection of the public in the event of an emergency.

Los Angeles County General Plan

The 2015 Los Angeles County General Plan has two chapters that pertain to police and fire services: the General Plan Public Services and Facilities Element and the General Plan Safety Element. The Public Services and Facilities Element establishes goals and policies for effective service and facilities planning and maintenance. The General Plan Safety Element establishes goals and policies for reducing the potential risk of death, injury, and economic damage from natural and human-caused disasters. As it relates to public services, the General Plan Safety Element has goals and policies related to effective emergency response and preparing for and/or preventing fire hazards. Most of the General Plan goals and policies for fire hazard preparation and prevention pertain to wildland fire hazards.

County of Los Angeles Office of Emergency Management

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.³⁷

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to the Los Angeles Police Department using only its own available resources.

Local

CCUSD Facilities Master Plan

CCUSD adopted its Facilities Master Plan in 2014, which outlined planned improvements to school facilities throughout its campuses. These changes were designed to increase student safety and health, familiarize students with the use of technology, and facilitate student learning and engagement. Planned improvements include asbestos and hazardous materials removal, exterior/site illumination improvements, fire alarm upgrades, security system installation, construction of shade structures, seismic retrofitting of existing structures, and installation of technology/telecom systems and electrical infrastructure. Overall, the cost of improvements to

³⁷ County of Los Angeles Chief Executive Office, Office of Emergency Management, 2023. OEM at a Glance. <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>. Accessed March 2023.

all CCUSD facilities identified in the Facilities Master Plan, along with construction contingencies, cost escalations, general conditions, liability, and design costs was estimated at \$165,300,161.³⁸ The CCUSD is currently in the process of developing an updated Facility Master Plan.³⁹

Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires that a community have an approved hazard mitigation plan in order to be eligible to apply for and receive FEMA hazard mitigation funds. The City and CCUSD received a grant to prepare a Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) which was approved by Cal OES and FEMA on June 1, 2017. The MJHMP presents a strategy for reducing the city's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan identifies the types of hazards that threaten the city, evaluates the city's vulnerability to those threats, and outlines a strategy to reduce or eliminate the risk posed by those threats.⁴⁰ The Act requires that the plan be updated every five years. The City and CCUSD are in the process of updating the MJHMP as required and to address recent state legislation (Assembly Bill 747 and Senate Bill 99) regarding evacuation routes.

Culver City Municipal Code

Sections of the City's Municipal Code applicable to fire protection, police protection, and EMS services include but are not limited to the following:

Section 9.02.005 (Adoption of the 2022 CFC): Adopts the 2022 CFC with amendments as the Fire Code of Culver City (Fire Code).

Section 9.02.035 (Keysets, Handles, Locks and Keys): All noted exterior doors shall be provided with locksets and handles for Fire Department Access. Keys for required access shall be provided by the owner and made readily available in the KNOX Box.

Section 9.02.040 (Automatic Fire-Extinguishing System): An automatic fire-extinguishing (sprinkler) system shall be installed in every new building in the city, including any new residential building, hereinafter constructed or moved into the city, regardless of area separation or type of construction.

Section 9.02.055 (Fire Hydrant Spacing): Fire hydrant spacing in commercial/industrial/residential areas shall be 300 feet apart. The maximum distance of a fire hydrant to a Fire Department Connection (FDC) shall not exceed 100 feet.

Section 9.08.385 (Authority to Close Streets): This section requires coordination with the Public Works Department to notify the Police Department and Fire Department prior to street closure for construction or repair work.

³⁸ Culver City Unified School District, 2014. Facilities Master Plan. https://www.ccusd.org/CapitalProjects/CCUSD_Facilities_Master_Plan.pdf. Accessed March 2023.

³⁹ Culver City Unified School District, 2023a. Culver City USD Future-Ready Facilities Plan. <https://www.ccusdfutureready.org/>. Accessed March 2023.

⁴⁰ Culver City, 2023. Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed March 2023.

Section 11.04.045 (Excessive False Alarms): This section allows the City to assess services charges to property owners for each false alarm that results in a CCPD response in excess of three false alarms in a 12-month period.

Section 11.04.065 (Police Chief Discretion): This section states that the Chief of Police shall have discretion to enforce rules, regulations, policies, procedures and directives necessary to implement the provisions of Chapter 11.04, Alarm Systems. Such powers shall include, but are not limited to, the power to promulgate, execute and enforce a policy regarding dispatch of police to alarm signals, as well as the discretion to discontinue police response to alarm signals due to the user's failure to comply with the provisions of Chapter 11.04, or to properly repair alarm systems deemed to constitute runaway alarms.

Section 17.300.040 (Outdoor Lighting): This section requires that security lighting be provided at all building entrances and exits.

Section 17.540 (Site Plan Review): This section provides procedures and standards for the comprehensive review of proposed development projects to: ensure compliance with the required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial, and public areas of the city. As such, this section may require new projects to be reviewed by CCFD and CCPD to ensure that fire-related, public safety, and site security measures are incorporated.

Section 17.560 (Comprehensive Plans): This section provides procedures and standards for Comprehensive Plans, including required findings to ensure that the proposed development is capable of creating an environment of sustained desirability and stability and will not be substantially detrimental to present and potential surrounding uses. As part of the Comprehensive Plan process, the Planning Department circulates project plans to other City departments for review and comment, including to CCFD and CCPD.

Culver City Fire Department 2019 Community Risk Assessment & Standards of Cover

CCFD's 2019 Community Risk Assessment & Standards of Cover (CRA) serves as CCFD's Integrated Risk Management Plan. The CRA defines the process, known as "deployment analysis," as a written procedure which determines the distribution and concentration of fixed and mobile resources of an organization. The purpose for completing such a document is to assist the agency in ensuring a safe and effective response force for fire suppression, emergency medical services, and specialty response situations. The CRA serves as: (1) the basis for continually measuring service level performance; (2) a predictive tool for helping to determine workload and ideal unit utilization; (3) a management tool for determining apparatus type and staffing levels; (4) a descriptive tool for validating service levels; and (5) a baseline tool for defining service level objectives. Performance measures set forth in the CRA applicable to the Project include, but are not limited to, the following:⁴¹

- **Response Time Goals:** Response time goals for fire suppression, technical rescue and HazMat are 7 minutes for the first due-in unit and 8 minutes for the Effective Response Force (ERF), 90 percent of the time. Response time goals for emergency medical services

⁴¹ Culver City Fire Department, 2019b. Community Risk Assessment, Standards of Cover. <https://www.culvercity.org/home/showdocument?id=17458>. Accessed March 2023.

(EMS) are 6 minutes, 20 seconds for the first due-in unit and 9 minutes, 50 seconds for the ERF, 90 percent of the time. It is noted that the above are goals, not standards.

- **Fire Flow Requirements:** Fire flow requirements range from 2,000 gallons per minute (gpm) in low-density residential areas up to 12,000 gpm in commercial and industrial areas.
- **High/Special Risk Fire Response:** High and Special Fire Risk incidents in the city represent unique critical tasking situations where there is very little historical response information to base tasking upon. These types of incidents are addressed with the region’s mutual aid agreements to help augment City resources. For example, the minimum mutual aid request to meet the demands of a high/special risk fire is an “A Assignment,” (i.e., one truck company (5 personnel), three engine companies (12 personnel), two rescue ambulances (4 personnel), two battalion chiefs (4 personnel), and one EMS Supervisor (1 personnel), requiring a total of 26 personnel to assist with the incident).

4.14.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold PS-1:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
- Fire Protection;
 - Police Protection;
 - Schools;
 - Parks;
 - Other Public Facilities.

Impacts related to parks and recreational facilities are addressed in Section 4.15, *Recreation*, of this Draft PEIR.

Methodology

As discussed in Chapter 2, *Project Description*, of this Draft PEIR, this analysis uses a Planning Area population projection of 62,400 for the year 2045 with implementation of the General Plan 2045 and Zoning Code Update. This population number is derived from a projected 29,710 housing units by the year 2045.

Fire protection needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of future development. The

analysis of impacts on fire protection evaluates the Project's effects on the demand for fire prevention and protection services to determine if implementation of the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Beyond the standards included in the Fire Code and other applicable regulations and plans, consideration is given to the anticipated growth projected to result from implementation of the Project, land uses proposed, fire flow necessary to accommodate the Project, the increase in demand for service created by the Project, and impacts to emergency response times. Based on these factors, a determination is made as to whether CCFD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. The Project would require new facilities if the projected increase in service population would reduce CCFD's inability to meet their emergency response times goals.

Police protection needs also relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of future development. The Project's police service population takes into consideration nighttime population (residents) and daytime population (employees) and considers the ratio of existing sworn police officers to the 2045 projected service population to determine if the Project would reduce CCPD's existing officer to service population ratio.

Projected demand for school facilities is based on 2022–2023 student enrollment data from CDE and the increase in housing units and population resulting from implementation of the Project. The increase in the number of elementary school, middle school, and high school student is projected based on the 2045 population projections under the Project. For example, projected elementary school enrollment was calculated by using 55 percent of the rate of 0.513 students per resident (0.28 students per unit) multiplied by the number of new housing units (12,700), and then added to the existing enrollment of students. The projected increase in student enrollment for 2045 is then compared to the remaining capacity within the District as of 2023 to determine if there is a need for additional school facilities as a result of the Project.

Project Impact Analysis

Fire Protection

Threshold PS-1.i: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would require the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Statement PS-1.i: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities as new facilities would be required to comply with existing regulations and Project policies, the concentration of new development would be in areas already well-served by fire protection services, and the Project includes additional policies to reduce fire hazards in the city. Therefore, the Project would result in a less-than-significant impact related to fire protection facilities.

General Plan 2045

Implementation of the General Plan 2045 would add an estimated 12,700 housing units, 21,600 residents, 3.7 million square feet of nonresidential uses, and 16,260 employees to the city, increasing the demand for fire protection services. While the projected population increase by 2045 would likely increase the demand for fire protection and emergency response services in the Planning Area, the increase in population is anticipated to occur incrementally over the next 25 years. Moreover, the Planning Area is a predominantly urban area that is built out, with limited land available for development. As discussed in Chapter 2, Project Description, and as shown in **Figure 2-6, Draft General Plan Land Use Map**, the Project's proposed land use approach would primarily concentrate growth as infill development and maintain existing parks and open space resources. However, as described above, CCFD is not currently meeting their emergency response time goals and has plans to augment their existing staff by seven staff members. Population growth as a result of the General Plan 2045 would primarily occur within developed areas served by CCFD; however additional staff may be needed to serve future development and the resulting population growth in order to meet their emergency response time goals.

Existing regional and local policies would minimize calls for fire protection services. The Fire Prevention Code of Culver City adopts an amended version of the California Fire Code. As noted in Section 4.14.2, Environmental Setting, the Planning Area is within an LRA, with the eastern portion of the city, including the Blair Hills neighborhood, a portion of the Culver Crest neighborhood, and areas within the IOF, located in a VHFHSZ. Refer to Section 4.19, Wildfire, for a detailed discussion pertaining to the potential impacts of the Project related to wildfire and fire hazards.

Public safety in Culver City, including fire protection and emergency services provided by CCFD, is funded from the City's general fund. Revenue sources that contribute to the general fund, including property and sales taxes, are anticipated to grow in rough proportion to the increase in residential dwelling units and nonresidential space in Culver City resulting from implementation of the General Plan 2045. In addition, the Project promotes compact development patterns through infill development and redevelopment, ensuring new development would be located close to existing fire stations. In general, new development anticipated under the Project would be located in activity centers and along commercial corridors. Furthermore, proposed policies that promote traffic calming, alternative transportation, and road diets contain language to ensure that emergency vehicles could efficiently access all parts of the Planning Area, thereby reducing the need for new facilities located closer to new development.

As Culver City's population increases, additional fire stations or expansions may be required. The 2019 Standards of Cover and Community Risk Assessment and the Culver City Fire Department Strategic Plan outline recommendations to increase CCFD performance regarding deployment, response time, data collection, and mutual aid. To augment current emergency services deployment capabilities, CCFD plans to add a third rescue ambulance at Fire Station #2 to assist in instances of concurrent runs and to augment their existing employees by seven additional staff. To address response time deficiencies, CCFD has moved to a new dispatch center, implemented turnout timers in stations, and will publish performance reports to crew members to reduce turnout times. The 2019 Standards of Cover and Community Risk Assessment also recommends continued CCFD use of the heedful audio alert system alerting units to warn other motorists of emergency service vehicles in the area which will reduce overall travel time. CCFD plans to continue to monitor call response times to measure the success of implementing these strategies to achieve response time goals and focus improvement efforts. CCFD also plans to improve data collection methods by improving reporting consistency and including a layer for all fire management zones in the new Mark 43 CAD (computer-aided dispatch).^{42,43} If these planned improvements do not provide appropriate capacity for CCFD to meet their emergency response time goals, CCFD would increase staff as needed to maintain appropriate levels to meet these goals.

Future projects would be reviewed by the City and CCFD on an individual basis and would be required to comply with applicable requirements, such as the installation of automatic fire sprinkler systems and providing adequate emergency site access, in effect at the time building permits are issued. Policies and implementation actions in the proposed General Plan 2045 are designed to ensure collaboration between the City, CCFD, and other involved agencies. This collaboration would ensure sufficient revenue would be available for necessary service improvements through developer impact fees to provide adequate fire facilities, equipment, and personnel through the horizon year 2045.

While no additional fire stations are currently proposed, the Standards of Cover will be updated by CCFD during implementation of the General Plan 2045 to identify what new and/or expanded fire stations may be needed to service the Planning Area through the 2045 planning horizon.

The project-specific environmental impacts of constructing new or expanded fire facilities to support the growth anticipated under the Project cannot be determined at this time because the site-specific locations and designs of future new or expanded facilities are not known. However, it can be expected that construction and operation of future new or expanded fire facilities would have similar impacts as would construction and operation of other types of new development allowed under the General Plan 2045. Various localized environmental impacts related to new construction or redevelopment of fire stations could occur, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. Development and operation of new fire

⁴² Culver City Fire Department, 2019b. Community Risk Assessment, Standards of Cover. <https://www.culvercity.org/home/showdocument?id=17458>. Accessed March 2023.

⁴³ Culver City Fire Department, 2019a. Culver City Fire Department Strategic Plan 2019–2024. <https://www.culvercityfd.org/About-the-Department/Documents>. Accessed March 2023.

stations may result from implementation of Policy S-7.6 which seeks to strengthen the City's firefighting capability to respond to multiple fire incidents caused by earthquake, Santa Ana winds, climate change, or other extraordinary circumstances. New facilities would be located consistent with specified land use designations and would be subject to policies in the General Plan 2045 that serve to avoid or minimize environmental impacts. These policies would address potential impacts of siting, construction, and operation of new facilities to the extent assessed in other sections of this PEIR. Proposed policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources (Goals C-2 and C-3 and associated policies), air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures (Policies N-2.1 and N-4.1), and management of archaeological materials found during development. Additionally, new projects, including development of new fire protection facilities would be subject to CEQA requirements, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated.

Due to the minimal effects that the development of new facilities could have on the environment with compliance with applicable regulations and proposed General Plan policies, the concentration of new development in areas already well-served by fire protection services, and the addition of policies to reduce fire hazards in the city, the impact of the Project with respect to fire protection is considered less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan are implemented in the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Furthermore, as the City proceeds with the construction of new or expanded fire protection facilities, those projects would be reviewed by the City for compliance with the policies and actions of the General Plan 2045, the City's Zoning Code Update, and applicable mitigation measures recommended in other sections of this Draft PEIR. Therefore, the Zoning Code Update would not require the construction of new or expanded fire protection facilities and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.1: California Building Code and California Fire Code. Continue to adopt and enforce the most up-to-date California Building Code and California Fire Code, with local amendments as appropriate.

S-7.4: Fire prevention code enforcement. Develop design standards and strengthen performance review and code enforcement programs to ensure proposed development incorporates fire prevention features.

S-7.6: Firefighting capability. Strengthen City firefighting capability to respond to multiple fire incidents caused by an earthquake, Santa Ana winds, climate change, or other extraordinary circumstances.

S-7.7: Building Code and Fire Code provisions. Enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions. Require additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate. This shall include assurance that structural and nonstructural architectural elements of the building are designed not to:

- Impede emergency egress for fire safety personnel, equipment, and apparatuses; and
- Hinder evacuation from fire, including potential blockage of stairways or fire doors.

S-7.13: Fire code enforcement. Continue to enforce the California Fire Code and Municipal Fire Code Amendments for new construction in fire hazard areas, like using sprinklers in residential structures.

S-7.14: Evacuation routes. Require all development proposals to identify evacuation routes or establish new evacuation routes as needed.

Goal C-2 Biological resources. Habitats for sensitive, threatened, and endangered wildlife species are protected and enhanced to support healthy, diverse ecosystems, and carbon storage.

Goal C-3 Wildlife and plant species. Threatened and endangered wildlife and plant species are protected within the city.

N-2.1: Noise compatibility. In the land use planning process, consider noise compatibility with existing and proposed land uses, along with the anticipated increase in development needed to accommodate growth.

N-4.1: Limit disturbance from new construction. Minimize construction noise and vibration impacts to reduce the disturbance from new development.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to fire protection facilities.

Police Protection

Threshold PS-1.ii: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would require the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Statement PS-1.ii: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities as new facilities would be required to comply with existing regulations and Project policies, the concentration of new development would be in areas already well-served by police protection services, and the Project includes additional policies to address crime potential in the city. Therefore, the Project would result in a less-than-significant impact related to police protection facilities.

General Plan 2045

Implementation of the General Plan 2045 would add an estimated 12,700 housing units, 21,600 residents, 3.7 million square feet of nonresidential uses, and 16,260 employees to the city, increasing the demand for police protection services. The projected increase in population and employment in the city would add to the number of service calls received and to the number of patrols and staff from CCPD and LASD necessary to service the Planning Area. Future growth in accordance with the General Plan 2045 is expected to create the typical range of calls for police service. To serve future growth, new and/or additional police resources would be needed to maintain the established service ratios. The anticipated growth that would result from the Project would likely increase the number of police responses in the city, which would increase the need for equipment and personnel. Therefore, the City's costs to maintain facilities and equipment as well as train and equip police personnel would also increase. In addition, the redistribution and increase of the population and traffic density into areas proposed for growth, such as commercial corridors and activity centers, could necessitate the reassignment of certain resources pertaining to police services. The costs of additional personnel and materials are anticipated to be offset through the increased revenues and fees generated by future development. In addition, future projects would be reviewed by the City on an individual basis and would need to comply with any impact fee requirements in effect when the review is conducted and necessary permits are issued.

To maintain the existing sworn officers ratios to population based on daytime population (residents + employees) and nighttime population (residents)—1:2,752 and 1:367, respectively—implementation of the General Plan 2045 would require hiring a minimum of 14 new officers for the daytime and 59 new officers for the nighttime to maintain the current ratios.⁴⁴ The increase in population is anticipated to occur incrementally over the next 25 years. Therefore, impacts to police services are anticipated to be adequately funded by an increase in tax revenues over an extended period of time, relative to the increase in development intensity. Although there is no direct fiscal mechanism ensuring that funding for police services from the general fund will grow exactly proportional to the increased need for services, development over time would increase contributions to the general fund through tax revenues and are expected to grow in rough proportion to any increase in residential dwelling units and/or nonresidential floor area in Culver City.

Additional police personnel and resources would be provided through the annual budget and CCPD review process. Annually, CCPD needs would be assessed and budget allocations revised

⁴⁴ Net new daytime population projection for 2045 is calculated by adding 21,600 new residents + 16,260 new jobs (employees) for 37,860 people. Net new nighttime population for 2045 is 21,600 residents.

accordingly to ensure that adequate levels of service are maintained throughout the city. Additional resources and personnel funded by an increase in tax revenue would maintain the level of service needed to support the increase in growth. In addition, LASD services would not be affected by implementation of the General Plan 2045 as proposed land use designations within the City's SOI would be "Open Space" and "Cemetery," which would not result in additional residential or employment growth and thus, would not require additional police personnel or resources.

As discussed above, to maintain the existing ratio of sworn officers and civilian employees per capita, implementation of the General Plan 2045 would require hiring a minimum of 59 new officers. Given this level of staff increase and the fact that CCPD only has one existing police station, new facilities may be necessary at some point in the future to accommodate the projected increase in staff needed to maintain the service ratios. Such facilities would occur where allowed under the designated Institutional land use. In addition, the costs of additional police personnel and materials are anticipated to be offset through the increased revenues and fees, including property and sales taxes, generated by future residential and nonresidential development allowed under the General Plan 2045.

The project-specific environmental impacts of constructing new or expanded other police facilities to support the growth anticipated under the Project cannot be determined at this time because the site-specific locations and designs of future new or expanded facilities are not known. However, it can be expected that construction and operation of future new or expanded police facilities would have similar impacts as would construction and operation of other types of new development allowed under the General Plan 2045. The construction of new police facilities or alterations to existing police facilities in order to provide sufficient capacity could have environmental impacts, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces.

New facilities would be located consistent with specified land use designations and would be subject to policies in the General Plan 2045. These policies would address potential impacts of siting, construction, and operation of new facilities to the extent assessed in other sections of this PEIR. Proposed policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources, air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures, and management of archaeological materials found during development. Additionally, new projects, including development of new police protection facilities would be subject to CEQA requirements, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated.

Due to the minimal effects that the development of new facilities could have on the environment with compliance with existing regulations and proposed General Plan policies, impacts on police services related to implementation of the General Plan 2045 would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the General Plan 2045 are implemented in the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities. Therefore, the Zoning Code Update would not result in significant adverse effects related to police protection services, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

There are no proposed General Plan goals or policies related to police services.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to police protection facilities.

Schools

Threshold PS-1.iii: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would require the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain sufficient capacity.

Impact Statement PS-1.iii: The Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and school capacity. However, payment of school impact fees would fully mitigate the impacts of development on school facilities for purposes of CEQA per SB 50. In addition, implementation of CCUSD's updated Future-Ready Facilities Plan would ensure that there is sufficient capacity to accommodate future public-school students. Therefore, the Project would result in a less-than-significant impact related to schools.

General Plan 2045

The General Plan 2045 anticipates the construction of up to 12,700 new potential housing units and up to 62,400 new residents in the Planning Area by 2045. Based on student generation rates from the CCUSD⁴⁵, the Project projects to generate 3,556 elementary school students⁴⁶, 1,016

⁴⁵ Student generation rates for residential uses are based on a rate of 0.513 students per residence (CCUSD's *Level I Developer Fees Study for Culver City School District*, March 2022, P. 9). The student generation rate is multiplied by the grade level assumptions to calculate the generation factor for elementary, middle and high school students. Since the Developer Fee Study does not specify grade levels for the residential land uses, the students generated by the residential uses are assumed to be divided among the elementary school, middle school, and high school levels as follows: 55 percent elementary school, 15 percent middle school, and 30 percent high school.

⁴⁶ Number of new elementary school students is calculated by multiplying 12,700 housing units by 0.28 students per unit (12,700 x 0.28 = 3,556 elementary school students).

middle school students⁴⁷ and 2,032 high school students⁴⁸ in Culver City public school enrollment. This would result in 2045 CCUSD enrollment of 6,630 elementary school students⁴⁹, 2,599 middle school students⁵⁰, and 4,187 high school students.⁵¹ No new school facilities are included in the Project. Based on the elementary school capacity of 3,188 students, and middle and high school practical capacity of 3,927 students shown in Table 4.14-5, projected enrollment in 2045 with project-generated students would exceed the elementary, and middle and high school capacities by 3,442 elementary students and 2,859 middle and high school students.

The Project contains policies related to schools, including continued coordination with the CCUSD to inform the District on impacts of major developments and population growth trends that may impact school enrollment. Furthermore, CCUSD is currently in the process of preparing the Future-Ready Facilities Plan, which is an update to the current 2014 Facilities Master Plan that would provide the current status and future use of school facilities as well as possible renovations, additions and related construction to remedy deficiencies as well as support teaching and learning priorities.⁵²

The project-specific environmental impacts of constructing new or expanded other public facilities to support the growth anticipated under the Project cannot be determined at this time because the site-specific locations and designs of future new or expanded facilities are not known. However, it can be expected that construction and operation of future new or expanded schools would have similar impacts as would construction and operation of other types of new development allowed under the General Plan 2045. The construction of new schools or alterations to existing schools in order to provide sufficient capacity could have environmental impacts, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. The siting of new schools is regulated by CDE. The California Education Code contains various provisions governing the siting of new public schools that require school districts to consider potential hazards to school occupants as well as other factors relevant to the public interest prior to the acquisition of a proposed school site. Although in many cases the avoidance or mitigation of hazards to school occupants would reduce impacts to the surrounding environment, the provisions of the California Education Code would not eliminate the potential for all construction-based or operational impacts of a new school.

As described above, the growth anticipated by the Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and anticipated

⁴⁷ Number of new middle school students is calculated by multiplying 12,700 housing units by 0.08 students per unit (12,700 x 0.08 = 1,016 middle school students).

⁴⁸ Number of new high school students is calculated by multiplying 12,700 housing units by 0.16 students per unit (12,700 x 0.16 = 2,032 high school students).

⁴⁹ Projected 2045 elementary school students is derived by existing number of elementary school students plus project-generated students (3,556 + 3,074 = 6,630 elementary school students).

⁵⁰ Projected 2045 middle school students is derived by existing number of middle school students plus project-generated students (12,700 x 0.08) + 1,583 = 2,599 middle school students).

⁵¹ Projected 2045 high school students is derived by existing number of high school students plus project-generated students (12,700 x 0.16) + 2,155 = 4,187 high school students).

⁵² Culver City Unified School District, 2023b. Frequently Asked Questions. <https://www.ccusdfutureready.org/faq>. Accessed April 2023.

school capacity. CCUSD would continue to collect development impact fees throughout implementation of the Project, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per SB 50. In addition, as estimated housing growth and student generation under the General Plan 2045 are based on realistic development capacity of proposed land uses designations in the city, a student population that exceeds these estimates is unlikely. Impacts of the Project related to student generation and the potential need for additional school facilities would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan are implemented is the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools. Therefore, the Zoning Code Update would not result in significant adverse effects related to school facilities. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Parks, Recreation, and Public Facilities Element

Goal PR-8: Educational opportunities. Students have access to exceptional educational opportunities at institutions in Culver City and through partnerships cultivated by the City.

PR-8.1: Partnerships with CCUSD. Formalize partnerships with the CCUSD to apprise the District on major development and population trends that may impact student enrollment and share data.

PR-8.2: Sitting of school facilities. Work closely with educational institutions to site new schools and facilities near parks, bike paths, and trails.

PR-8.3: Opportunities for students. Collaborate with CCUSD and higher educational institutions in the city to develop internships, job shadowing, capstones, and other opportunities targeted to students.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to school facilities.

Other Public Facilities

Threshold PS-1.v: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would require the provision of other public facilities, the construction of which could cause significant environmental impacts, in order to maintain sufficient capacity.

Impact Statement PS-1.v: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities as new or expanded facilities would be required to comply with existing regulations and Project policies. Therefore, the Project would result in a less-than-significant impact related to other public facilities.

General Plan 2045

Implementation of the General Plan 2045 would add an estimated 12,700 housing units, 21,600 residents, 3.7 million square feet of nonresidential uses, and 16,260 employees to the city. Development and growth in the city would increase demand for other public facilities. As demand for other public facilities increases as a result of implementation of the Project, there may be a need to increase staffing and facilities (i.e., libraries) to maintain acceptable service ratios and other performance objectives. If an existing public facility is at capacity for staffing, this could require an expansion of an existing public facility or construction of a new public facility, the construction of which could cause environmental impacts.

The project-specific environmental impacts of constructing new or expanded other public facilities to support the growth anticipated under the Project cannot be determined at this time because the site-specific locations and designs of future new or expanded facilities are not known. However, public facilities are allowed within the “Institutional” land use designation as shown on **Figure 2-6, Draft General Plan Land Use Map**, in Chapter 2, *Project Description*. As shown in **Table 2-4, General Plan 2045 Projections by Land Use**, in Chapter 2, *Project Description*, there would be no increase in the amount of land designated for institutional uses. As such, the City would maintain its existing 3,076,600 square feet of institutional uses. However, there is still expectation for population growth resulting from implementation of the General Plan 2045, which could result in the expansion of existing public facilities or construction of new public facilities within the “Institutional” land use designations. It can be expected that construction and operation of future new or expanded public facilities would have similar impacts as would construction and operation of other types of new development allowed under the General Plan 2045. As the City proceeds with the construction of new or expanded public facilities, those projects would be reviewed by the City for compliance with the policies and actions of the General Plan 2045 and the mitigation measures recommended in other sections of this Draft PEIR. Therefore, the physical effects on the environment from the construction of new or expanded other public facilities would be less than significant, and future development allowed under the General Plan 2045 would not result in significant adverse effects related to other public facilities. Impacts would be less than significant.

Due to the minimal effects that the development of new facilities would have on the environment with compliance with existing regulations and proposed General Plan policies, the impact of the Project with respect to public facilities is considered less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City’s General Plan are implemented through the development that will occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045,

the Zoning Code Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities. Therefore, future development under the Project would not result in significant adverse effects related to public facilities, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Parks, Recreation, and Public Facilities Element

Goal PR-7: Public facilities. Public facilities in Culver City, including libraries and City-owned facilities, offer high-quality services to the community.

PR-7.1: Public facility maintenance. Maintain and continue to modernize and adjust configuration of public facilities, including City Hall, The Transportation Facility, the Public Works/Parks Maintenance Yard, and the Transfer and Recycling Station. Continue to reinvest in existing facilities to extend their useful lifetimes.

PR-7.2: Long-term operations and maintenance cost reduction. Identify ways to reduce the City's long-term operations and maintenance costs, such as adapting more energy-efficient technologies for facilities, using low-water landscape palettes, and using recycled water for irrigation.

PR-7.3: Programming on City-owned facilities. Continue to program events, update landscapes, and incorporate art on City-owned public facilities, including City Hall, to create more welcoming, activated, attractive, and unique places.

PR-7.4: Partnerships with the Los Angeles County Public Library. Establish and maintain partnerships with the Los Angeles County Public Library and collaborate to provide targeted programming and outreach to students in need of tutoring, mentoring, after-school programming and other support outside of the classroom.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to other public facilities.

4.14.5 Cumulative Impacts Analysis

Fire Protection

CCFD maintains mutual aid agreements with the City of Los Angeles, Los Angeles County, and Cities of Beverly Hills, Santa Monica, and West Hollywood. The geographic context for the cumulative analysis of fire protection is the service area of CCFD and LACFD, which includes Culver City and incorporated and unincorporated areas of Los Angeles County. A significant cumulative environmental impact would result if future growth in the county consistent the general plans and zoning codes of local jurisdictions in the area, in combination with the growth anticipated as a result of the Project would exceed the ability of CCFD and LACFD to adequately meet its commitments, thus requiring construction of new facilities or modification of existing facilities. The Project and general plan updates or other development in areas served by CCFD,

including those with mutual aid agreements, would increase the population of the service area, thereby increasing the need to provide staff, equipment, and facilities to maintain acceptable emergency response times and other indicators of fire protection services. Revenue sources that contribute to the Cities' and the County's general funds, including property and sales taxes, would be expected to grow in rough proportion to the increase in residential dwelling units and nonresidential space in areas served by CCFD resulting from implementation of general plan updates or other development. In addition, the Project promotes compact development patterns with infill development, thus ensuring that new development would be located close to existing fire stations. Furthermore, CCFD has established mutual aid agreements with both the City of Los Angeles and Los Angeles County to increase response levels of service to residents of the city as well as surrounding areas, if aid were needed. Therefore, the contribution of the Project to this impact would not be cumulatively considerable.

Police Protection

The geographic context for the cumulative analysis of police service is the service area of CCPD and LASD, which includes Culver City and incorporated and unincorporated areas of Los Angeles County. A significant cumulative environmental impact would result if future growth in the county would exceed the ability of CCPD and LASD to adequately meet its commitments, thus requiring construction of new facilities or modification of existing facilities. As the CCPD does not provide police protection services outside of the City boundary, development and growth associated with other nearby jurisdictions would not result in cumulative impact on CCPD resources and their service commitments. The costs of additional police personnel and materials are anticipated to be offset through the increased revenues and fees, including property and sales taxes, generated by future residential and nonresidential development allowed under general plan updates or other development. The Project also promotes compact development patterns with infill development, thus ensuring that new development would be located close to existing police stations. LASD services would not be affected by implementation of the Project as proposed land use designations within the City's SOI would be "Open Space" and "Cemetery," which would not result in additional residential or employment growth and thus, would not require additional police personnel or resources. As a result, the contribution of the Project to this impact would not be cumulatively considerable.

Schools

The geographic context for the cumulative analysis of schools is the boundaries of CCUSD. A significant cumulative environmental impact would result if future growth within the district would exceed the ability of the district to adequately meet the needs of its students, thus requiring construction of new facilities or modification of existing facilities. As discussed under Impact PS-1.iii, CCUSD would continue to collect development impact fees throughout implementation of the Project, meaning future development would incrementally pay for any needed facility upgrades and expansions that would ensure that there is sufficient capacity to accommodate future public-school students. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per SB 50. For this reason, the contribution of the Project to this impact would not be cumulatively considerable and cumulative impacts related to schools would be less than significant.

Other Public Facilities

The geographic context for the cumulative analysis of other public facilities, such as libraries, is the service area of the Los Angeles County Library system, which includes both incorporated and unincorporated areas of Los Angeles County. A significant cumulative environmental impact would result if future growth in the county would exceed the ability of the library system to adequately serve its patrons, thus requiring construction of new facilities or modification of existing facilities. Population growth anticipated under the Project may result in the need for new public facilities such as libraries, and new facilities would be subject to environmental review under CEQA, proposed General Plan land use designations, and proposed General Plan policies related to construction impacts. For this reason, the contribution of the Project to this impact would not be cumulatively considerable. The Project would result in less-than-significant cumulative impacts related to other public facilities.

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4.15 Recreation

4.15.1 Introduction

This section provides an analysis of the potential environmental impacts on recreation from future development allowed under the Project, including potential impacts related to deterioration of existing recreational facilities and construction or expansion of recreational facilities. The section provides context regarding the Planning Area's existing parks and recreational facilities, as well as relevant federal, State, and local regulations and programs.

4.15.2 Environmental Setting

Parks and Recreational Facilities

Culver City benefits from a diverse array of parks, open spaces, joint use facilities, and other outdoor open spaces that residents, employees, and visitors can visit within or near city limits.

Park Classifications

The City uses a classification system to divide parks and open spaces into eight types: regional parks, community parks, neighborhood parks, parkettes/mini parks, linear parks, special use areas, natural open space, and undeveloped land. These types vary in size, function, and amenities offered to residents, employees, and visitors of Culver City (see **Table 4.15-1, *Park and Open Space Classifications***).

City Parks

The City owns and operates two community parks, seven neighborhood parks, and five parkettes/mini parks within city limits that the City's Parks, Recreation and Community Services (PRCS) Department maintains and operates. Parks are listed in **Table 4.15-2, *Parks in the Planning Area***, and depicted in **Figure 4.15-1, *Existing Parks and Recreational Facilities in the Planning Area***. In total, the City owns and maintains approximately 85 park acres, excluding the Stoneview Nature Center, a facility owned and operated by Los Angeles County within city limits.

Other Outdoor Recreational Spaces

In addition to the parks that Culver City owns and maintains, Culver City residents, employees, and visitors can easily access other outdoor recreational spaces in the community, such as public plazas. In addition, there are some spaces outside the city's boundaries, but within a walkable distance (one half-mile) of Culver City residents and workers. In total, these spaces comprise approximately 700 acres (193 within the city limits and 506 within a half mile of the city limits) and include the following:

- **Public plazas owned by Culver City.** The City owns and operates two public plazas that provide limited passive use. These plazas are Heritage Park in front of City Hall and the Town Plaza.

**TABLE 4.15-1
 PARK AND OPEN SPACE CLASSIFICATIONS**

Type	Description
Regional Parks	Large recreation areas designed to serve the entire region beyond city limits. The City does not own any regional parks.
Community Parks	Usually between 15 and 40 acres, community parks are designed to serve people within a 2- to 3-mile radius. They provide for a variety of passive and active uses.* Community parks may include sports fields (lit or unlit), basketball courts, restrooms, indoor facilities, picnic areas, and specialized facilities (such as dog parks and skateparks).
Neighborhood Parks	Neighborhood parks are intended to serve neighborhood residents within a mile of the park and are usually between 3 and 15 acres. Neighborhood parks may have playgrounds, picnic areas, trails, open grass areas for passive use, outdoor basketball courts, and multi-use open grass areas for sports.
Parkettes/Mini Parks	Less than 3 acres, parkettes/mini parks are typically designed for use by small children or as green oases in the middle of an urban context. Parkettes/mini parks may have open grass areas, playgrounds, and a small picnic area.
Linear Parks	Linear parks are developed landscaped areas and other lands that follow linear corridors such as rivers, creeks, abandoned railroad rights-of-way, canals, powerlines, and other elongated features. This type of park usually contains trails, landscaped areas, viewpoints, and seating areas.
Special Use Areas	Special use areas are sites often occupied by a specialized recreation facility. Some uses that fall into this category include waterfront parks, boat ramps, botanical gardens, community gardens, single purpose sites used for a particular field sport, or sites occupied by recreation buildings.
Natural Open Space	Natural open space is defined as undeveloped land primarily left in its natural form with recreation uses as a secondary objective. It is usually owned or managed by a governmental agency and may or may not have public access. This type of land may include wetlands, steep hillsides, or other similar spaces. In some cases, environmentally sensitive areas are considered open space and can include wildlife habitats, stream and creek corridors, or unique and/or endangered plant species.
Undeveloped Land	This land is undeveloped and has not yet been designated for a specific park use.

* The term "passive use" refers to recreational activities that do not require specialized park equipment and management, such as walking, biking, and picnicking. "Active uses" require the use of special facilities, courses, fields, or equipment. Examples of active uses include playing basketball, swimming, and using playground equipment.

SOURCE: Culver City, 2023. Parks, Recreation, and Public Facilities Element.

- Parks owned by other agencies.** This includes parks owned by the State of California and the City of Los Angeles. The State of California’s Baldwin Hills Conservancy owns and operates the Baldwin Hills Scenic Overlook, which is within city limits. To the east of the city limits, the State owns and operates the Kenneth Hahn State Recreation Area. The City of Los Angeles owns and operates five parks within one half-mile of city limits. The City has a long-term lease with the City of Los Angeles to use Media Park.
- Joint Use Facilities.** The City has a joint use agreement with the Culver City Unified School District (CCUSD) that allows CCUSD to use City recreational facilities in exchange for use of school buildings and fields. The City does not have a formalized joint use agreement with West Los Angeles College, but the City rents space to West Los Angeles College as needed.
- Privately Owned Public Open Spaces.** Some private developers in the city operate privately owned public open spaces (POPOs) as conditions of development approval. These areas allow for passive uses like walking and sitting. This includes spaces like the Platform, Culver Steps, and the event lawn and town square at Ivy Station.

**TABLE 4.15-2
PARKS IN THE PLANNING AREA**

Facility	Amenities	Acres
Community Parks		50.2
Culver City Park	Play area, basketball half courts, baseball fields (including Bill Botts Field), open turf area, restroom, picnic area, skatepark, playground, trails, the Boneyard Dog Park	34.1
Veterans Park	Basketball courts (one with lights), tennis courts (with lights), softball fields (one with lights), open turf areas, handball walls, restroom, picnic shelter, playground, Veterans Memorial Building, aquatic center, teen center, community gardens, paddle tennis courts (with lights)	16.1
Neighborhood Parks		32.4
Blair Hills Park	Playground, basketball court, softball field, restroom, picnic shelter	1.8
Blanco Park	Tee-ball diamonds, recreation building, picnic shelter, open turf areas, walking path	3.1
Carlson Park	Open turf area, restroom, picnic shelter, sculpture, night lighting	2.5
Culver West Alexander Park	Playground, basketball court (with lights), tennis court (with lights), paddle tennis courts (with lights), handball courts (with lights), passive use area with mounds and shade trees, recreation building, picnic areas	3.1
El Marino Park	Playground, basketball court (with lights), handball wall, open turf area, restroom, recreation building, picnic area, ceramics hut	1.6
Fox Hills Park	Playground, basketball half courts (with lights), tennis courts (with lights), paddle tennis courts (with lights), volleyball court (with lights), softball fields, open turf areas, restroom, picnic area, fitness equipment, loop trail	10.0
Lindberg Park	Playground, basketball court, softball fields (with partial lights), soccer field, handball wall, open turf areas, restroom, recreation building, picnic shelters	4.2
Syd Kronenthal Park	Play area, basketball court (with lights), tennis court (with lights), paddle tennis courts (with lights), softball fields (with lights), recreation building, picnic shelters, fitness equipment, trail loop	6.1
Parkette/Mini Parks		2.8
Coombs Parkette	No amenities, open turf area	0.5
Fox Hills Parkette	Benches	0.8
Tellefson Park	Playground, open turf areas, restroom, picnic shelter	1.5
Special Use Area		5.0
Stoneview Nature Center ^a	Fitness zones, hiking trails, nature centers	5.0
Total Acres		90.4

^a Stoneview Nature Center is within Culver City limits but is operated by Los Angeles County.

SOURCES: Culver City, 2009. Parks and Recreation Master Plan. https://www.culvercity.org/files/assets/public/documents/building-development/city-documents/1_2009_parksandrecreationm.pdf. Culver City, 2023. Parks, Recreation, and Public Facilities Element.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Parks and Open Space
- Waterbody
- Recreation Facilities

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 4.15-1
Existing Parks and Recreational Facilities
in the Planning Area



Park Service

The City maintains park service standards for city parks, regional parks, and joint use facilities to evaluate park service. The park service ratio, or ratio of number of acres of parks per 1,000 residents, is a metric the City uses to measure park service and calculate park dedication requirements for new development. A higher service ratio indicates more acres of park per 1,000 residents.

The City’s current park service standard, established in the 1968 General Plan, aimed to provide 10 acres of park space per 1,000 residents. One acre per 1,000 residents may be satisfied with joint use agreements with the CCUSD and 6 acres per 1,000 residents may be satisfied by regional parks, leaving at least 3 acres per 1,000 residents to be satisfied by City-owned parks. As shown in **Table 4.15-3, Current Park Service**, the city is not currently meeting its park service standard. Based on a projected population of 62,400 in 2045, the city would need an additional 264 park acres to achieve its service standard.

**TABLE 4.15-3
CURRENT PARK SERVICE**

Park Type	Standard (in acres per 1,000 residents)	Current Park Acres	Current Service Ratio ^a
Culver City Parks	3.0	90.4	2.2
Joint use facilities	1.0	30.0 ^b	0.7
Regional parks	6.0	240.0 ^b	6.0
Total	10.0	360.4	8.9

NOTES:

^a Based on a 2019 population of 40,200.

^b Acreage totals based on 2009 Parks and Recreation Master Plan. Regional park acreage includes the Kenneth Hahn Regional Park, which is outside city limits and not operated by Culver City.

SOURCES: Culver City, 2023. Parks, Recreation, and Public Facilities Element.

Culver City has a lower than average park service ratio compared to the rest of Los Angeles County, as the parks service ratio (based on City parks alone) averages 2.2 in Culver City and 3.3 countywide.¹ However, the countywide ratio is inclusive of cities in more suburban settings, where there is generally more open space and greenery. For instance, compared to more suburban cities like Calabasas, Claremont, and Rolling Hills Estates, Culver City has a lower parks service ratio.² However, the City has a greater parks service ratio than cities that are similarly situated in the urban core of the Los Angeles region, including Inglewood, Redondo Beach, and Santa Monica, indicating a stronger level of park service than comparable cities.

¹ Los Angeles County Department of Parks and Recreation. 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment Appendix A: Study Area Profiles. <https://lacountyparkneeds.org/final-report/>. Accessed March 2023.

² Culver City. 2020. Parks, Public Facilities, and Public Services Existing Conditions Report, p. 8. <https://www.pictureculvercity.com/resources>. Accessed March 2023.

Park Access

The City's park service ratio provides an understanding of population relative to park acreage, and therefore provides a measure of the availability of park space to serve residents. However, this ratio alone is not sufficient to determine the quality of park service in Culver City. The park service ratio, for instance, does not consider park amenities that improve park usability, like illuminated space, which makes parks usable for more hours of the day, or active and passive space, which allow for a greater variety of uses and programming. Another important factor to consider is accessibility to parks and other public outdoor recreational spaces, or the quality of the pedestrian environment leading to and from a green space. Residents and workers are more likely to visit parks and outdoor recreational spaces if they live within a ten-minute, or one half-mile, walking distance of a park. Living within a walkable distance of a park or outdoor recreational space can benefit residents, as physical activity is linked to stress reduction, improved mental health, and respiratory fitness.

As shown in **Figure 4.15-2, Public Access to Existing Parks**, approximately 90 percent of Culver City residences are within a one half-mile walking distance of a park, trail, or open space, including facilities just outside city limits.

Recreational Facilities

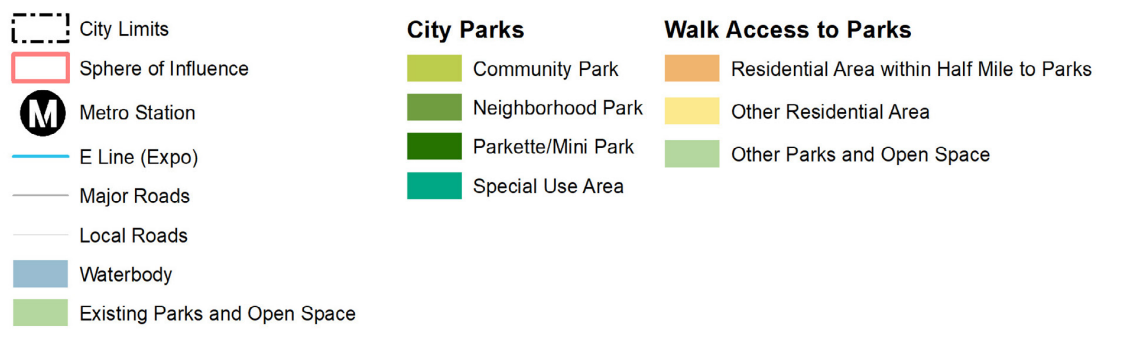
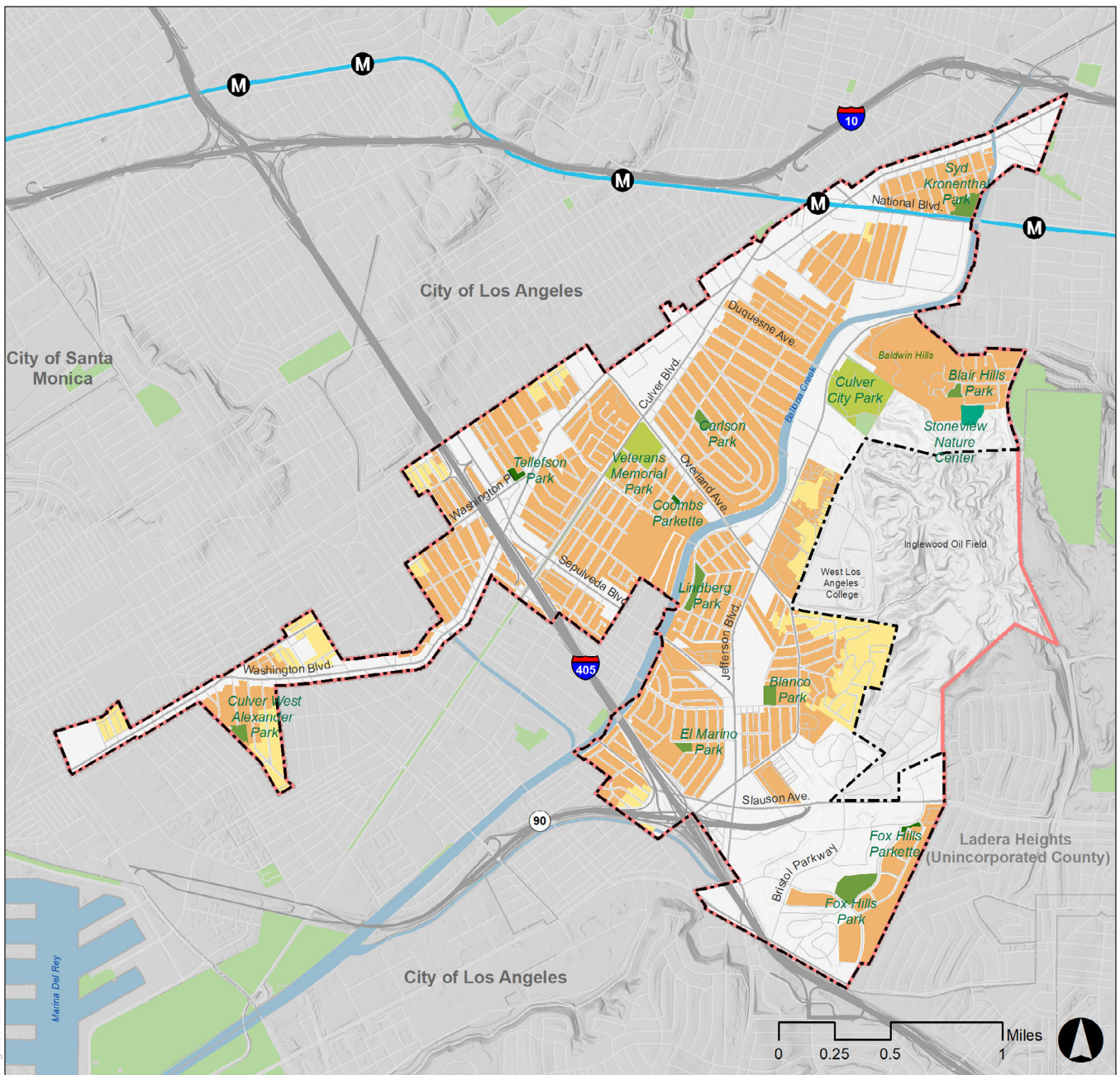
The City owns and operates a range of recreational facilities available for classes, sports, performances, social events, camps, and more. These include the Municipal Plunge; recreational buildings at Blanco Park, Culver West Alexander Park, El Marino Park, Lindberg Park, and Syd Kronenthal Park; Veterans Memorial Building, the Culver City Teen Center, and the Culver City Senior Center. These facilities are also shown in Figure 4.15-1.

Municipal Plunge. The Culver City Municipal Plunge is a public swimming pool operated by the City. The City's mission is to "...provide comprehensive aquatics programming that meets the needs of the community through highly accessible, enjoyable and varied opportunities for learning and recreation. We strive to offer a safe, responsive and welcoming aquatics environment that promotes the health and well-being of our City's residents."³ The City allows CCUSD to use the Municipal Plunge via a joint use agreement.

Recreation Buildings. Blanco, Culver West Alexander, El Marino, Lindberg, and Syd Kronenthal Parks have recreation buildings with rentable meeting rooms. Most buildings are used for contract classes and afterschool and preschool programs.

Veterans Memorial Complex. Veterans Memorial Complex is a community facility located at Veterans Memorial Park, a 16.1-acre community park that occupies a full block. The Complex includes Veteran's Memorial Building and the Teen and Senior Centers. All facilities in the complex are available for rentals and regularly accommodate concerts and other performances, workshops and conferences, film and television shoots, private parties, community meetings, indoor sport activities, trade shows and exhibitions, as well as other events.

³ Culver City. 2023a. Culver City Pool. <https://www.culvercity.org/Explore/Parks-Recreation/Culver-City-Pool>. Accessed July 28, 2023.



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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 4.15-2
Public Access to Existing Parks



Veterans Memorial Building (VMB). Built in 1951, VMB is a Culver City Historical Society designated historic building located at 4117 Overland Avenue and is approximately 11,259 square feet in size.⁴ VMB houses Veterans Memorial Auditorium and the Culver City Historical Society.

Culver City Teen Center. Built in 1956, the Teen Center is located at 4153 Overland Avenue and is approximately 10,897 square feet in size.⁵ The facility is one story and available for rentals with a capacity of 100+. Amenities include audio/visual equipment, chairs, tables, risers, podiums, and Wi-Fi.⁶

Culver City Senior Center. Built in 2003, the Senior Center is located at 4095 Overland Avenue and is approximately 27,237 square feet in size.⁷ The Senior and Social Services Division, a multi-service agency housed at the Culver City Senior Center, provides a variety of educational, recreational and social services that meet the needs and interests of seniors, residents with disabilities and members of the general community. The numerous programs and services offered provide access to information and support as well as opportunities for participation in activities that lead to personal growth and enrichment.⁸

Trails

The City manages a trail network that mostly consists of trails within existing parks. Several park facilities, including Culver City, Fox Hills, and Syd Kronenthal Parks have self-contained loop trails. Culver City's existing trail network has limited connectivity. In addition, a trail runs along a median in Culver Boulevard, connecting residents south to Del Rey. Culver City residents also have access to trails at regional parks, including the Culver City Stairs leading up to a scenic overlook at the Baldwin Hills Recreational Area.

The biggest opportunity for trail improvement in Culver City is the City's Ballona Creek Revitalization Project, which has potential to improve water quality, better connect residents to Ballona Creek, provide recreational, aesthetic, and ecological benefits. Currently, a multi-use bicycle and pedestrian path follows the north side of the Creek through almost the entire stretch through the city, ending at Syd Kronenthal Park at the northeast end of the path. The path connects to the Park to Playa Trail, managed by the City of Los Angeles, a 13-mile trail linking parks, trails, and open spaces from Baldwin Hills to the Pacific Ocean. Implementing the Ballona Creek Revitalization Project will better connect neighborhoods to Ballona Creek and extend the existing multi-use path in Ballona Creek's future development.

⁴ Culver City Historical Society, 2011. Historic Site #13 - Veterans Memorial Building. <https://www.culvercityhistoricalsociety.org/historic-sites/veterans-memorial-building/>. Accessed July 2023.

⁵ Culver City, 2016. Americans with Disabilities Act (ADA) Self Evaluation and Transition Plan, PS0061 RFP Number 1590, Addendum No. 1. <https://www.culvercity.org/home/showdocument?id=2339>. Accessed on October 23, 2019.

⁶ Culver City. 2023d. Teen Center. <https://www.culvercity.org/Explore/Parks-Recreation/Teen-Center>. Accessed March 2023.

⁷ Culver City, 2016. Americans with Disabilities Act (ADA) Self Evaluation and Transition Plan, PS0061 RFP Number 1590, Addendum No. 1. <https://www.culvercity.org/home/showdocument?id=2339>. Accessed on October 23, 2019.

⁸ Culver City. 2023b. Culver City Senior Center. <https://www.culvercity.org/City-Hall/Jobs/Culver-City-Senior-Center>. Accessed March 2023.

4.15.3 Regulatory Framework

This section provides the relevant State, regional, and local regulations applicable to the Project. There are no federal regulations regarding recreation that apply to the Project.

State

Quimby Act

California Government Code Section 66477, Subdivision Map Act, referred to as the Quimby Act, authorized cities and counties to pass ordinances requiring that developers set aside land, donate conservation easements, or pay park fees (often referred to as in-lieu fees) for park improvements. Under the Quimby Act, fees must be paid or land must be conveyed directly to the local public agencies that provide park and recreation services on a communitywide level; however, revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. The act states that the dedication requirement of parkland can be a minimum of 3 acres per 1,000 residents or equal to the existing parkland provision (up to 5 acres per 1,000 residents) if the existing ratio is greater than the minimum standard. The Quimby Act allows cities to require a higher dedication if the need can be demonstrated.

Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971, California Public Resources Code Sections 5400 through 5409 (the Act). Under the Public Park Preservation Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation, land, or both are provided to replace the parkland acquired. The Public Park Preservation Act only applies when a public agency both acquires real property that is in use as a public park and the public agency uses the property for non-park purposes.

Regional

Proposition A Funds

Proposition A Funds may be used to fund the development, acquisition, improvement, restoration and maintenance of parks; recreational, cultural and community facilities; and open space lands. These funds are administered by the Los Angeles County Regional Park and Open Space District. The Open Space District was created when voters approved Proposition A in 1992. Proposition A authorized an annual assessment on nearly all of the 2.25 million parcels of real property in the county. Proposition A funded \$540 million for the acquisition, restoration or rehabilitation of real property for parks and park safety, senior recreation facilities, gang prevention, beaches, recreation, community or cultural facilities, trails, wildlife habitats, or natural lands, and maintenance and servicing of those projects. In 1996, voters approved another Proposition A to fund an additional \$319 million for parks and recreation projects and additional funds for maintenance and to service those projects.

Landscaping and Lighting Districts

The California Landscaping and Lighting Act of 1972 authorizes local legislative bodies to establish benefit related assessment districts, or Landscaping and Lighting Districts (LLADs), and to levy

assessments for the construction, installation, and maintenance of certain public landscaping and lighting improvements. LLADs may be established to maintain local public parks.

Mello-Roos District

A developer may apply to the County to form a Mello-Roos District pursuant to the California Mello-Roos Community Facilities Act of 1982 to develop and maintain park improvements. Pursuant to County guidelines, the parks should be regional in nature, and have an impact or benefit beyond the associated subdivision.

Los Angeles County General Plan

The Los Angeles County General Plan applies to the unincorporated County land in the Planning Area. Chapters 10 and 13 address parks and recreation facilities. Policies identified in the Parks and Recreation Element of the Los Angeles County General Plan include parkland classifications, parkland dedication requirements, funding mechanisms for the planning and development of recreational facilities, and issuance of development fees.^{9,10} The following are applicable policies:

P/R 1.5: Ensure that County parks and recreational facilities are clean, safe, inviting, usable, and accessible.

P/R 1.7: Ensure adequate staffing, funding, and other resources to maintain satisfactory service levels at all County parks and recreational facilities.

P/R 2.2: Establish new revenue generating mechanisms to leverage County resources to enhance existing recreational facilities and programs.

P/R 3.1: Acquire and develop local and regional parkland to meet the following County goals: 4 acres of parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.

P/R 6.4: Ensure that new buildings on County Park properties are environmentally sustainable by reducing carbon footprints, and conserving water and energy.

Los Angeles Code of Ordinances

The Los Angeles County ordinance applies to the unincorporated County land in the Planning Area and contains provisions pertaining to park dedication. Title 21 – Subdivisions of the Los Angeles County General Plan contains guidance and requirements pertaining to the dedication of private and public park sites and identifies when park fees are required.

Local

Culver City Municipal Code

Chapter 15.10, Subdivisions of the Culver City Municipal Code (CCMC) requires developers subdividing land for residential uses to dedicate parkland or pay an in-lieu fee. Chapter 15.10 is

⁹ Los Angeles County, 2015a. Los Angeles County General Plan Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf. Accessed March 2023.

¹⁰ Los Angeles County, 2015b. Los Angeles County General Plan Chapter 13: Public Services and Facilities Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch13.pdf. Accessed March 2023.

consistent with the Subdivision Map and Quimby Acts, which allow cities whose general plan contains policies and standards for park and recreation facilities to adopt by ordinance a parkland dedication requirement or in-lieu fees. Subdivisions in Culver City exempt from this requirement include those containing senior housing and/or low- or moderate-income housing. Parkland dedications and in-lieu fees are based on residential density of a proposed development. Chapter 15.10 does not establish a service radius for dedications, but states that the parkland dedication or fees "shall be used only for the purpose of developing new or rehabilitating existing neighborhood or community park or recreational facilities reasonably related to serving the subdivision." The City must accept in-lieu fees for projects with 50 residential units or fewer per Chapter 15.10.

Further, Chapter 15.06 of the CCMC (Residential Development Park Dedication and In Lieu Parkland Fees) requires all residential development, not just residential development that is a result of a subdivision, to dedicate parkland and in-lieu fees. This allows the City to collect in-lieu fees from residential projects, additional units on the same property, and conversions of single-family homes to multi-family projects. Chapter 15.06 allows the City to acquire and dedicate parkland outside of the proposed residential development. For instance, if a developer owns a parcel adjacent to an existing park, and the City determines that this parcel would benefit the City's parks and recreation system, the City may allow the developer to dedicate that property instead of property within a proposed residential development.

The City, however, does not require non-residential developers to develop parkland or recreational facilities as a condition of development. Many other California cities, per the Fee Mitigation Act (Section 66000 of California Government Code), require non-residential developers to dedicate parkland or pay in-lieu fees. Park and public space dedications from non-residential development are negotiated between the City and developers on a project-to-project basis as conditions of development approval.

4.15.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold REC-1:** 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.
- Threshold REC-2:** Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Methodology

As discussed in Chapter 2, *Project Description*, of this PEIR, this analysis uses a Planning Area projected increase in population of 21,600 people and a total projected population of 62,400 for the Project. The Planning Area includes Culver City and the SOI. In addition, this analysis

considers the existing parkland ratio of 10 acres of parkland per 1,000 residents, which is equal to the General Plan 2045's parkland standard. The existing parkland ratio is comprised of 1 acre of parkland per 1,000 residents that may be satisfied with joint use agreements with the CCUSD and 6 acres of parkland per 1,000 residents that may be satisfied by regional parks. At least 3 acres of parkland per 1,000 residents are to be satisfied by City-owned parks.

The provision of recreational facilities and ability to fund their installation and maintenance is provided for at a statewide level under the Quimby Act, a regulation allowing cities to require dedication of land or payment of fees for parks and recreation as a condition of tentative or parcel map approval.

Project Impact Analysis

Deterioration of Existing Recreational Facilities

Threshold REC-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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.

Impact Statement REC-1: **The Project would not 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 and would therefore, result in a less than significant impact related to deterioration of existing recreational facilities.**

General Plan 2045

Implementation of the General Plan 2045 would result in 12,700 additional housing units and 21,600 new residents at full buildout. An increase in population could result in greater use of the City's existing parks and recreational facilities. The Project would also result in an increase of daytime population as a result of the increase in non-residential floor area.

As shown in Table 4.15-3, the current City park service ratio is 8.9 acres of parkland per 1,000 residents, inclusive of regional parks and joint use facilities. The current service ratio for City-parkland is 2.2 acres per 1,000 residents, which does not meet the standard of 3 acres per 1,000 residents. Although the General Plan 2045 maintains the park service standards, the City would continue to fall short of acres of parkland needed to meet future demand, in accordance with the City's service standard. Therefore, the Project would not meet the 3 acres of City-parkland per 1,000 residents service ratio.

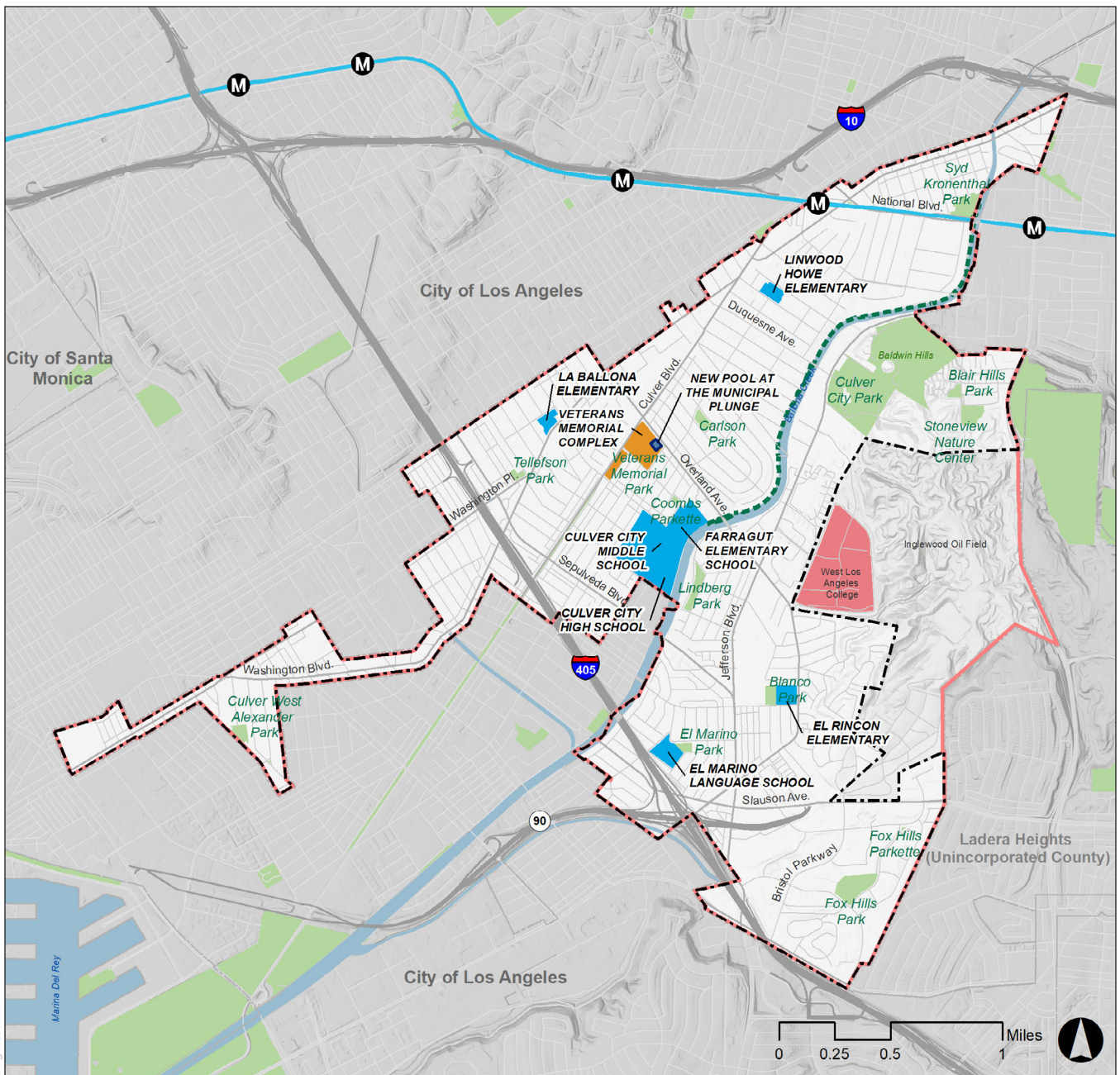
The City has identified locations for planned or proposed trails and recreational facilities throughout Culver City. While there are currently no planned or proposed parks, as part of the General Plan 2045, there are plans to bridge the City's aquatic center to the Teen Center and open new community meeting rooms in the planned bridge. In addition, the City plans to build a new lesson pool and update the Municipal Plunge as a warm pool for family use. Further, there are opportunities to strengthen the City's joint use agreement with CCUSD and West Los Angeles College to provide more access to recreational facilities and open spaces to residents. Joint-use

facilities are proposed throughout the City, as shown in Figure 4.15-3. A 2-mile extension of the multi-use path along Ballona Creek from Syd Kronenthal Park to Mid-City is also proposed under the Project. These locations are shown in **Figure 4.15-3, Proposed Recreational Facilities**.

While no new parks are currently proposed within the Planning Area, approximately 90 percent of Culver City residences are within one half-mile walking distance of an existing park, trail, or open space, including facilities just outside City limits. The General Plan 2045 includes policies to reduce park access inequities (Policy PR-1.1); ensure the pursuit of new parks and public space development opportunities (Policy PR-1.4), investment in (Policy PR-5.1 and Policy PR-5.4), and maintenance of public recreation facilities (Policy PR-3.1), which would minimize substantial physical deterioration of existing or new facilities due to use. Policies provided in the General Plan 2045 include securing funding for park and recreational facility maintenance and requiring developers to dedicate land and/or contribute fees to support park and recreational facility development. Policy PR-1.4 identifies specific ways to develop parks and public space such as incorporating more green space, landscaping, and passive recreational uses onto City-owned property or land; naturalizing the Ballona Creek and incorporating new mini parks along the Creek; developing parkettes/mini parks, woonerfs, and plazas. This policy also encourages the purchase of parcels to convert to parks in SB 1000¹¹ priority neighborhoods and areas beyond a ten-minute walk of a park, as opportunities arise. Policy PR-1.4 encourages development of community gardens throughout the city; and identifying potential locations to extend curb bump-outs to reclaim public space from roadways for uses such as parklets and gardens. Furthermore, the addition of new trails and recreational facilities proposed under the Project would help serve residents in the Planning Area, although trails are not counted toward public parkland.

Although the City is currently not meeting the park service ratio standard, the General Plan 2045 includes policies that would prioritize new park development. The City's park service ratio provides an understanding of population relative to park acreage, and therefore a measure of the availability of park space to serve residents, but this ratio alone does not determine the quality of park service available to residents. In addition to improving the amount of park space and access to parks, park amenities need to be enhanced to improve the park quality in the City. The park service ratio does not consider park amenities that improve park usability, like illuminated space, which makes parks usable for more hours of the day, or active and passive space, which allow for a greater variety of uses and programming. Accessibility to parks and other public outdoor recreational spaces, and the quality of the pedestrian environment leading to and from a green space is also an important factor in quality which relates to use of recreational facilities. Residents and workers are more likely to visit parks and outdoor recreational spaces within close proximity to a park. Living within a walkable distance of a park or outdoor recreational space can benefit residents, as physical activity is linked to stress reduction, improved mental health, and respiratory fitness. The General Plan establishes policies to reduce park access inequities, plans for parks and other outdoor recreational spaces in areas lacking convenient park access, and establishes a performance metric to track the percent of population within walking distance of a park.

¹¹ SB 1000 requires local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans.



- City Limits
- Sphere of Influence
- Metro Station
- E Line (Expo)
- Major Roads
- Local Roads
- Waterbody
- Existing Parks and Open Space
- Trails
 - Ballona Creek Trail Extension
- Joint Use Facilities**
 - CCUSD Facilities
 - West Los Angeles College
- The Municipal Plunge**
 - New lesson pool and upgrade
- Veterans Memorial Complex**
 - Bridging the aquatics center to the Teen Center

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 4.15-3
Proposed Recreational Facilities



City staff identified several needed improvements for its park system, including trail expansion; lighting in active spaces; shade; new and updated sports fields; Internet access; accessibility amenities and features; updated playgrounds, restrooms, and park buildings; and turf renovations. Implementation of the General Plan 2045 as well as adoption and continual updates to the City's Park and Recreation Master Plan (PRMP) can ensure that City staff has direction and resources to make these improvements.

Policies in the proposed General Plan 2045 would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, the Project would not 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. Impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan are implemented in the development that would occur throughout the city over time. In addition, development resulting from the General Plan 2045 would be required to pay parks and recreation impact fees in accordance with the City's Municipal Code. Therefore, the Zoning Code Update would not result in significant adverse effects related to parks and recreational facilities and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Parks, Recreation, and Public Facilities Element

Goal PRI-1: Equitable access. Equitable and safe access to parks, recreation, open spaces, and programming.

PR-1.1: Park walkability. Strive for all residents to be within a ten-minute walk of parks, open spaces, and joint use facilities.

PR-1.4: New parks. Pursue new opportunities to develop parks and public space, including:

- Incorporating more green space, landscaping, and passive recreational uses onto City-owned property or land.
- Studying the potential to naturalize the Ballona Creek and incorporate new mini parks along the Creek.
- Developing parkettes/mini parks, woonerfs, and plazas, particularly in built-out areas (like Downtown) or neighborhoods in need of park space.
- Purchasing parcels to convert to parks in SB 1000 priority neighborhoods and areas not within a ten-minute walk of a park, as opportunities arise.
- Developing community gardens throughout the city, particularly in neighborhoods lacking convenient access to healthy foods.
- Identifying potential locations to extend curb bump-outs to reclaim public space from roadways for uses such as parklets and gardens.

Goal PR-3: Maintenance. Parks, recreational facilities, and public facilities are well-maintained and upgraded.

PR-3.1: Maintenance funding and standards. Secure funding for park and recreational facility maintenance and establish standards to ensure parks and facilities are adequately maintained.

Goal PR-5: Funding and resources. Parks, recreational facilities, and public facilities have improved funding mechanisms for maintenance and capital improvements projects.

PR-5.1: Dedications from private developers. Require developers to dedicate land/or contribute fees to support park and recreational facility development.

PR-5.4: Alternative funding sources for parks and recreation. Seek alternative sources of funding for parks and recreational facilities.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts related to deterioration of existing recreational facilities.

Require Construction or Expansion of Recreational Facilities

Threshold REC-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Statement REC-2: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the Project would result in a less than significant impact.

General Plan 2045

As stated under Impact REC-1, as part of the General Plan 2045, there are plans to bridge the City's aquatic center to the Teen Center and open new community meeting rooms in the planned bridge. The City also plans to build a new lesson pool and update the Municipal Plunge. In addition, the General Plan 2045 includes a 2-mile extension of the multi-use path along Ballona Creek from Syd Kronenthal Park to Mid-City. Construction of these facilities could result in physical impacts to the environment, including potential disturbance or conversion of habitat, impacts to water quality during construction, increased noise levels, and an increase in impermeable surfaces which could result in flooding or polluted runoff.

The Project encourages the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. The Project includes Policy PR-1.4 under Goal PR-1 which encourages the pursuit of new opportunities to

develop parks. This policy identifies specific ways to develop parks and public space including incorporating more green space, landscaping, and passive recreational uses onto City-owned property or land; naturalizing the Ballona Creek and incorporating new mini parks along the Creek; developing parkettes/mini parks, woonerfs,¹² and plazas; purchasing parcels to convert to parks in SB 1000 priority neighborhoods and areas beyond a ten-minute walk of a park.

The precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for individual development projects or master/specific plans. Future development would be consistent with the proposed land use designations and policies. Environmental impacts associated with construction of new and expanded of parks and recreational facilities identified above that are proposed as part of the Project development of parks and recreational facilities would be subject to additional environmental review under CEQA, as needed.

Various proposed goals and policies in the General Plan 2045 consider energy and water use efficiency and sensitive habitat preservation, encourage the use of native vegetation and/or drought-tolerant landscaping where reasonable; and promote sustainable stormwater management through the construction of on-site green infrastructure. In addition, the Conservation Element includes policies such as maintaining and improving Ballona Creek's capacity for flood control and ensuring City projects and other proposed projects along Ballona Creek include features and BMPs to increase capture of urban runoff and increase infiltration, which aim to reduce stormwater runoff and hydromodification effects, including erosion, siltation, and flooding related to Ballona Creek (Goal C-6 and associated policies). Further, future development would be subject to City Zoning Code requirements including setback requirements, landscape requirements, and outdoor lighting regulations designed to minimize environmental impacts associated with the construction of new or expanded parks and recreational facilities. Therefore, General Plan 2045 policies are designed to minimize environmental impacts associated with the construction of new parks or expanded recreational facilities. As such, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan are implemented in the development that would occur throughout the city over time. Furthermore, construction of new or expanded parks and recreational facilities that would occur under the Project would be reviewed by the City for compliance with applicable policies of the General Plan 2045, the Zoning Code Update, and applicable mitigation measures referenced in other sections of this PEIR. Therefore, the Zoning Code Update itself would not result in physical effects on the environment from the construction of new or expanded parks and recreational facilities. Impacts would be less than significant.

¹² Woonerfs are a streetscape design to accommodate pedestrians, bicyclists, and vehicles in a shared space.

Applicable Proposed General Plan Goals and Policies

Parks, Recreation, and Public Facilities Element

Goal PR-1: Equitable access. Equitable and safe access to parks, recreation, open spaces, and programming.

PR-1.4: New parks. Pursue new opportunities to develop parks and public space, including:

- Incorporating more green space, landscaping, and passive recreational uses onto City-owned property or land.
- Studying the potential to naturalize the Ballona Creek and incorporate new mini parks along the Creek.
- Developing parkettes/mini parks, woonerfs, and plazas, particularly in built-out areas (like Downtown) or neighborhoods in need of park space.
- Purchasing parcels to convert to parks in SB 1000 priority neighborhoods and areas not within a ten-minute walk of a park, as opportunities arise.
- Developing community gardens throughout the city, particularly in neighborhoods lacking convenient access to healthy foods.
- Identifying potential locations to extend curb bump-outs to reclaim public space from roadways for uses such as parklets and gardens.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts related to requiring construction or expansion of recreational facilities.

4.15.5 Cumulative Impacts Analysis

The geographic context for the analysis of cumulative impacts associated with parks and recreational facilities is the Westside region of Los Angeles County, which is comprised of the cities of Beverly Hills, Culver City, Malibu, Santa Monica, and West Hollywood as well as the communities of Bel Air, Brentwood, Century City, Hollywood, Marina Del Rey, the Miracle Mile, Pacific Palisades, Playa Vista, Venice, and Westwood.¹³ Future development in this portion of the county, including future development allowed under the Project, could have an adverse effect on existing parks and recreational facilities in the region, and thus could result in a potentially significant cumulative impact with respect to the overuse and degradation of existing park facilities. Future development and population growth anticipated by the Project would generate additional demand for parks and recreational facilities. While there are no new planned parks or park expansion identified for development through the Plan's 2045 planning horizon, the General Plan 2045 includes a trail extension, expansion of joint-use agreements,

¹³ Los Angeles County Economic Development Corporation, 2023. Westside. <https://laedc.org/thrive-in-la/regions-cities/westside/>. Accessed March 2023.

and a proposal to bridge the City's aquatic center to the Teen Center, construction of a new lesson pool and updates to the Municipal Plunge. The General Plan 2045 includes several policies to prioritize development of new parks, expand connections and access to existing and future parks and recreational facilities, and to improve existing facilities through 2045 to better serve the projected increase in population under the Project. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable.

Demand for parks and recreation facilities due to future development in this portion of the county, including future development allowed under the Project, could result in the construction or expansion of additional parks and recreational facilities, the construction of which might have adverse physical effects on the environment. As a result, the construction or expansion of additional parks and recreation facilities could result in a potentially significant cumulative impact. The Project contains plans for additional recreational facilities in the Planning Area. All new and expanded facilities would be subject to applicable General Plan land use designations and policies as well as applicable Zoning Code regulations related to construction and operational impacts. Elements of the General Plan 2045 and standards within the Zoning Code Update are designed to minimize potentially cumulatively considerable environmental impacts of new development, including sustainable park and recreational facility design, development, and planning standards. Therefore, the Project would not contribute to a cumulatively significant impact related to the construction or expansion of recreational facilities, the construction of which might have adverse physical effects on the environment.

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4.16 Transportation

4.16.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on transportation from future development allowed under the Project, including potential impacts related to circulation programs, plans, ordinances, and policies; vehicle miles traveled (VMT); geometric hazards and incompatible uses; and inadequate emergency access. The section provides context regarding the Planning Area's existing roadway network, bicycle and pedestrian conditions, and transit conditions, as well as relevant federal, state, and local regulations and programs.

4.16.2 Environmental Setting

The Planning Area, as shown in Figure 2-2, *Planning Area*, includes Culver City and its unincorporated sphere of influence (SOI). As shown in the figure, the Planning Area 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 SOI includes land within unincorporated portions of Los Angeles County located adjacent to the City. The SOI is located to the east of the City boundary in the Baldwin Hills area of Los Angeles County, west of La Cienega Boulevard.

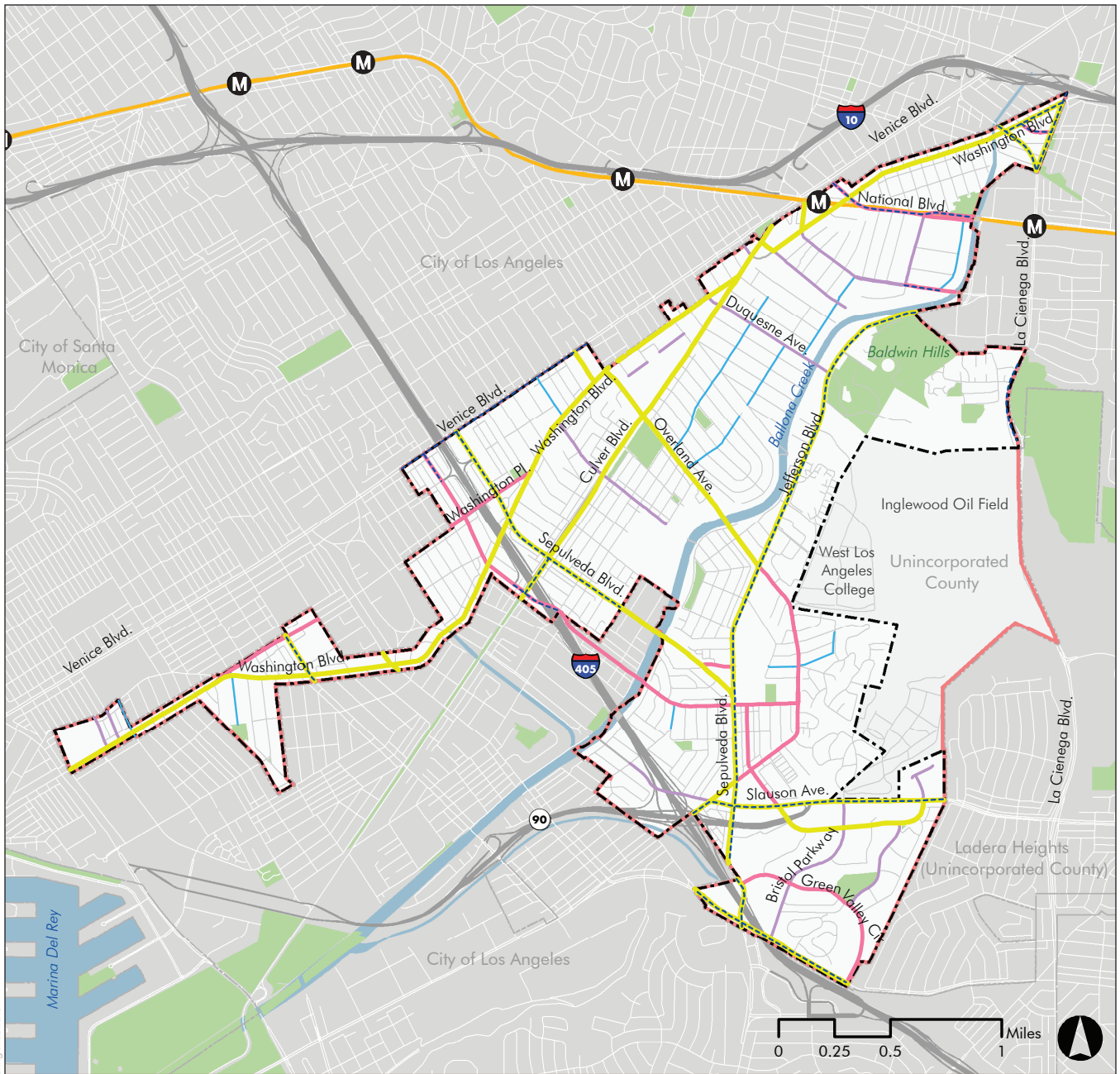
The Planning Area includes approximately 3,910 acres of land, including approximately 3,280 acres of land (84 percent) within the City's jurisdictional boundaries and approximately 630 acres of land (16 percent) in its SOI. Existing land uses in the Planning Area include residential (44 percent), commercial (15.7 percent), industrial (7.1 percent), open space (19.8 percent), cemetery (7.5 percent), studio (3.5 percent), Ballona Creek (2.3 percent), and institutional (0.1 percent).

Existing Roadway Network















The following describes the existing roadway network as it is classified in the current Culver City General Plan Circulation Element, amended through 2004. Under the General Plan 2045 Mobility Element, functional roadway classifications would change in accordance with the federal and State functional classification system. For reference, **Figure 4.16-1, Future Roadway Network**, shows the future roadway network with this classification system.

Freeways

Two freeways, the San Diego (I-405) and the Marina (SR-90), traverse Culver City. The Santa Monica Freeway (I-10) abuts the most northeast portion of the city. The California Department of Transportation (Caltrans) operates these facilities. From a roadway classification and hierarchy standpoint, freeways are the highest level of roadway in the Planning Area, providing limited access and grade-separated intersections from the rest of the roadway network. Their primary function is to carry large volumes of regional and interstate traffic at high speeds.



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- | | | |
|-------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------|
|  | City Limits | Future Roadway Network & Classification |
|  | Sphere of Influence |  Primary Arterial |
|  | Metro Station |  Secondary Arterial |
|  | E Line (Expo) |  Major Collector |
|  | Major Roads |  Minor Collector |
|  | Local Roads |  Local Street |
|  | Parks and Open Space |  Truck Route |
|  | Waterbody | |



SOURCE: Mobility Element, 2023

Culver City General Plan 2045

Figure 4.16-1
Proposed Roadway Network



Primary Arteries

Primary arteries serve primarily through, non-local traffic and provide limited local access. They have a curb-to-curb width of 95 feet or more; however, many primary arterials in the city are not as wide due to existing development. High vehicular volumes and speeds characterize traffic flow on primary arteries. The number of lanes on primary arteries ranges from four and six lanes plus left-turn lanes, with limited occurrences of private driveways. Some primary arteries, such as Culver Boulevard and Venice Boulevard,¹ accommodate landscaped medians and on-street parking. Designated primary arteries in Culver City include Adams Boulevard, Centinela Avenue, Culver Boulevard, Fairfax Avenue, Jefferson Boulevard, La Cienega Boulevard, Overland Avenue, Playa Street, Robertson Boulevard, Sepulveda Boulevard, Slauson Avenue, Venice Boulevard, Washington Place, and Washington Boulevard. Several of these primary arteries are also designated truck routes.

Secondary Arteries

Secondary arteries connect primary arteries and neighborhood feeders serving both non-local through traffic and local access. They have a right-of-way ranging from 80 to 94 feet, although some streets within the city serving this function are observed to be narrower. The number of travel lanes on secondary arteries ranges from two and four lanes. Designated secondary arteries in Culver City include Bristol Parkway, Buckingham Parkway, Duquesne Avenue, Glencoe Avenue, Green Valley Circle, Hannum Avenue, National Boulevard, and Sawtelle Boulevard.

Neighborhood Feeders

Neighborhood feeder streets are primarily located in residential neighborhoods connecting arteries and local streets. With one lane in each direction, neighborhood feeders are not designed to accommodate regional through traffic. However, many have become popular bypass routes due to heavy peak period congestion and the proliferation of smartphone-based traffic applications. Designated neighborhood feeder streets in Culver City include Beethoven Street, Braddock Drive, Elenda Street (Washington to Culver), Girard Avenue, Higuera Street (Washington to Hayden), Lucerne Avenue, Redwood Avenue, and Walgrove Avenue.

Local Streets

Local streets provide access between adjacent land uses and connect private parking and driveways to larger non-local streets. Local streets typically do not exceed 60 feet in right-of-way (40 feet in pavement width) or have a painted centerline and are found mostly in residential neighborhoods. Examples of designated local streets in Culver City include Irving Place, Kinston Avenue, Selmaraine Drive, and McConnell Avenue.

Bicycle and Pedestrian Conditions

Bicycle, walking, and micromobility services are integral to Culver City's transportation network and provide essential first/last-mile connections to transit. City staff have expressed the desire to provide a connected bicycle network, including Class II, Class III, and Class IV facilities (see

¹ It should be noted that for much of Venice Boulevard, the city limit runs along the south side of the street, with just the curb-side parking area west of Sawtelle Boulevard located within the city.

description of bicycle facility classifications, below), where appropriate. Potential locations for low-stress active travel improvements include Culver Boulevard, Elenda Street, and north-south arteries such as Overland Boulevard. As an important active transportation corridor, the Ballona Creek Bike Path, can also be improved, with lighting, safety, additional access points in permitted areas, and other related improvements. A comprehensive inventory of proposed bicycle facilities is outlined in Table 10 of the 2020 Bicycle and Pedestrian Action Plan. Additionally, Culver City released the Local Road Safety Plan in November 2021.

Bikeway Facilities

Culver City's existing network of Class I and Class II bicycle facilities is disconnected, with few routes intersecting others, forcing cyclists to share space with motor vehicles. Bicycle lanes along Washington Boulevard are inconsistent, changing between Class II and Class III multiple times. The Ballona Creek Bike Path is a popular regional bicycle route, but it has few access points into Culver City, and some access points are busy arterial streets without bicycle infrastructure (such as Sepulveda Boulevard and Overland Avenue). Other access points, such as Duquesne Avenue, were restriped with Class II bicycle lanes using green paint, providing a connection to downtown. Bicycle lanes along Jefferson Boulevard also provide a connection to the lanes on Duquesne Avenue to the north but do not continue to the south.

Overall, Culver City's location and boundaries present a challenge for a continuous, connected bicycle network. Surrounded by the City of Los Angeles and several unincorporated areas on all sides, many of Culver City's arterial streets function as regional connectors for motor vehicle traffic in all directions. Any reallocation of street space would require significant coordination from a regional traffic perspective. Further, streets such as Sepulveda Boulevard and Washington Place are not contiguously inside the city's boundaries, therefore requiring that the respective government agencies coordinate to design continuous bikeways along these corridors.

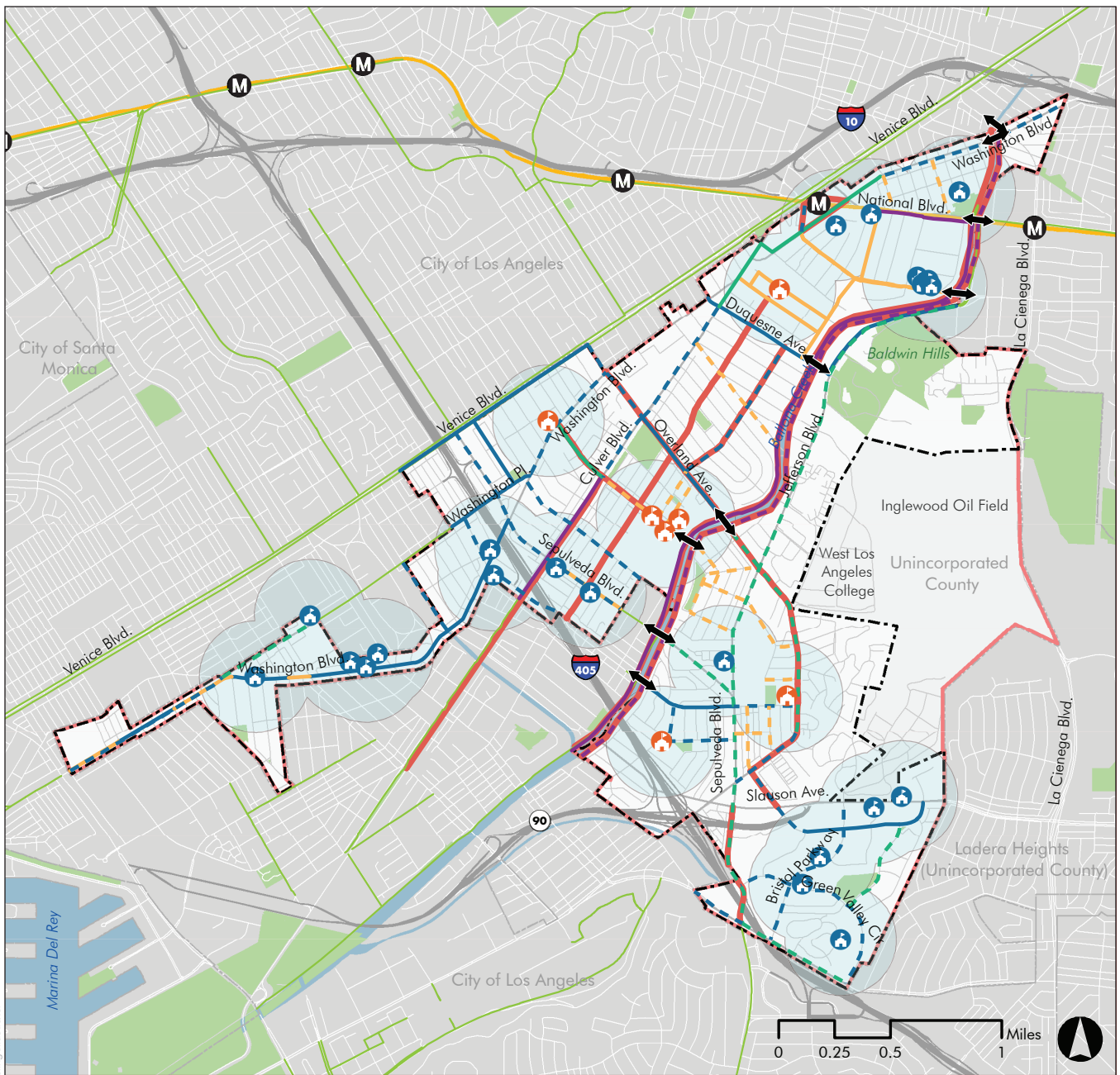
The following section provides a description of the functional classification of bicycle facilities within the Planning Area, as mapped in **Figure 4.16-2, Existing and Proposed Bicycle Network**. The general purpose of the bikeway network is to encourage access for both work and non-work trips by active modes within the city and adjoining communities, in addition to enhancing opportunities for recreation.

Class I Bicycle Path

Class I are shared-use bicycle paths, or paved trails. The facilities provide separate, exclusive right-of-way for bicycling, walking, and other non-motorized uses. They can be considered the lowest stress facilities, as there are few potential conflicts between bicycles and motor vehicles. Culver City has a total of 4.4 miles of shared-use path facilities, with Ballona Creek Bike Path the longest at 3.2 miles.

Class II Bicycle Lane

Class II are striped, preferential lanes on roadways for one-way bicycle travel. Some bicycle lanes include striped buffers that add a few feet of separation between the bicycle lane and traffic lane or parking aisle. These facilities are important for the overall bikeway network that Culver City strives to achieve because they provide a designated space for riders along a roadway. Culver City currently has 6.5 miles of roads with bicycle lanes.



- City Limits
 - Sphere of Influence
 - Metro Station
 - E Line (Expo)
 - Major Roads
 - Local Roads
 - Parks and Open Space
 - Waterbody
- Future Bicycle Network**
- Private School
 - Public School
 - Ballona Creek Crossing
 - Safe Routes to School (SRTS) Improvement Zone
 - Existing Regional Bicycle Facility
 - Active Transportation Corridor
 - Existing Class I: Bike Path
 - Proposed Class I: Bike Path
 - Existing Class II: Bicycle Lane
 - Proposed Class II: Bicycle Lane
 - Existing Class III: Bicycle Route
 - Proposed Class III: Bicycle Route
 - Existing Class IV: Separated Bikeway
 - Proposed Class IV: Separated Bikeway

*Bicycle network includes other forms of transportation vehicles such as scooters, e-bikes, etc.

SOURCE: Mobility Element, 2023

Culver City General Plan 2045

Figure 4.16-2
Existing and Proposed Bicycle Network



Class III Bicycle Route (Sharrow)

Class III are signed routes where people riding bicycles share a travel lane with people driving. Because they are mixed-flow facilities, bicycle routes are only appropriate for low-volume streets with slow travel speeds. Some routes are designated only by Caltrans-compliant Bicycle Route signs, while others are designated by signs and painted shared-lane markings, or "sharrows," to indicate a shared environment for bicycle riders and motorists. Among other benefits, shared-lane markings reinforce the legitimacy of bicycle traffic on the street, recommend proper bicyclist positioning, and may be configured to offer directional and wayfinding guidance. Class III on residential streets may be designated as "bicycle boulevards." Traffic calming measures that help to slow traffic and assist bicyclists and pedestrians in crossing busier roadways are included as needed to help reduce cut through vehicle trips. Culver City currently has about 3.5 miles of Class III bicycle routes.

Class IV Separated Bikeway

Class IV—or separated bikeways—also known as cycle tracks, are on-street facilities that are physically separated from motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle. This facility type provides extra separation between moving vehicles and people riding bicycles so that bicyclists feel more secure while traveling along a roadway. Culver City currently has no separated bikeway facilities.

Pedestrian Facilities

Most streets in Culver City have sidewalks in good condition. Downtown Culver City features wide promenade sidewalks with space for amenities like seating, planters, and public art. However, there are gaps in sidewalk coverage along Bentley Avenue from Venice Boulevard to Washington Place, on both sides of the street, and on the south side of Slauson Avenue, east of Hannum Avenue. A comprehensive inventory of proposed pedestrian facilities is outlined in Table 11 of the 2020 Bicycle and Pedestrian Action Plan along with recommended improvements and sample costs.

Transit Conditions

Culver City Transit Center

The Culver City Transit Center is located at the southeast corner of the Slauson Avenue and Sepulveda Boulevard intersection, north of the Westfield Mall and SR-90. The Transit Center is an outdoor facility that connects multiple bus services, including Metro Lines 110, 108/358, and 217; and Culver CityBus Lines 3, 4, and 6. City Bus Lines 2 and Rapid 6 also provide service to Slauson Avenue and Sepulveda Boulevard next to the Transit Center. Services connect riders to Metro Rail B (Red), A (Blue), C (Green), and E Line (Expo). Additionally, riders can take Culver CityBus Line 6 or Rapid 6 to the Los Angeles International Airport (LAX) City Bus Center to transfer for free on LAX Shuttle C, which serves all passenger terminals at LAX. Free parking is available at the Culver City Transit Center and the adjacent Westfield Mall parking lot.

Robertson Transit Hub

The Robertson Transit Hub is located on the east side of Robertson Boulevard between Venice Boulevard and Washington Boulevard. The Transit Hub connects riders to multiple services

including Culver City Bus Line 7, Metro Line 17, and Big Blue Bus Line 17. The Transit Hub is adjacent to Metro E Line Culver City Station and Metro's Culver City Bike Hub, which provides secure parking for 64 bicycles as well as a variety of bicycle commuter-related services including bike rentals, repairs, classes, and community events. Metro's Culver City Bike Hub also provides a lounge and restroom facility for all rail/bus operators.

West Los Angeles Transit Center

The West Los Angeles Transit Center, or the Washington Fairfax Hub, is a terminal located directly underneath Interstate Highway 10 on Washington Boulevard and Fairfax Avenue. Although the West Los Angeles Transit Center is located just outside of Culver City limits, it serves as an important transit node. Many transit lines begin and terminate at the West Los Angeles Transit Center, including Metro Lines 14, 35, 37, 38, 105, 217, 705 and 780 and Culver City Bus Lines 1 and 4.

Fixed-Route Transit Service

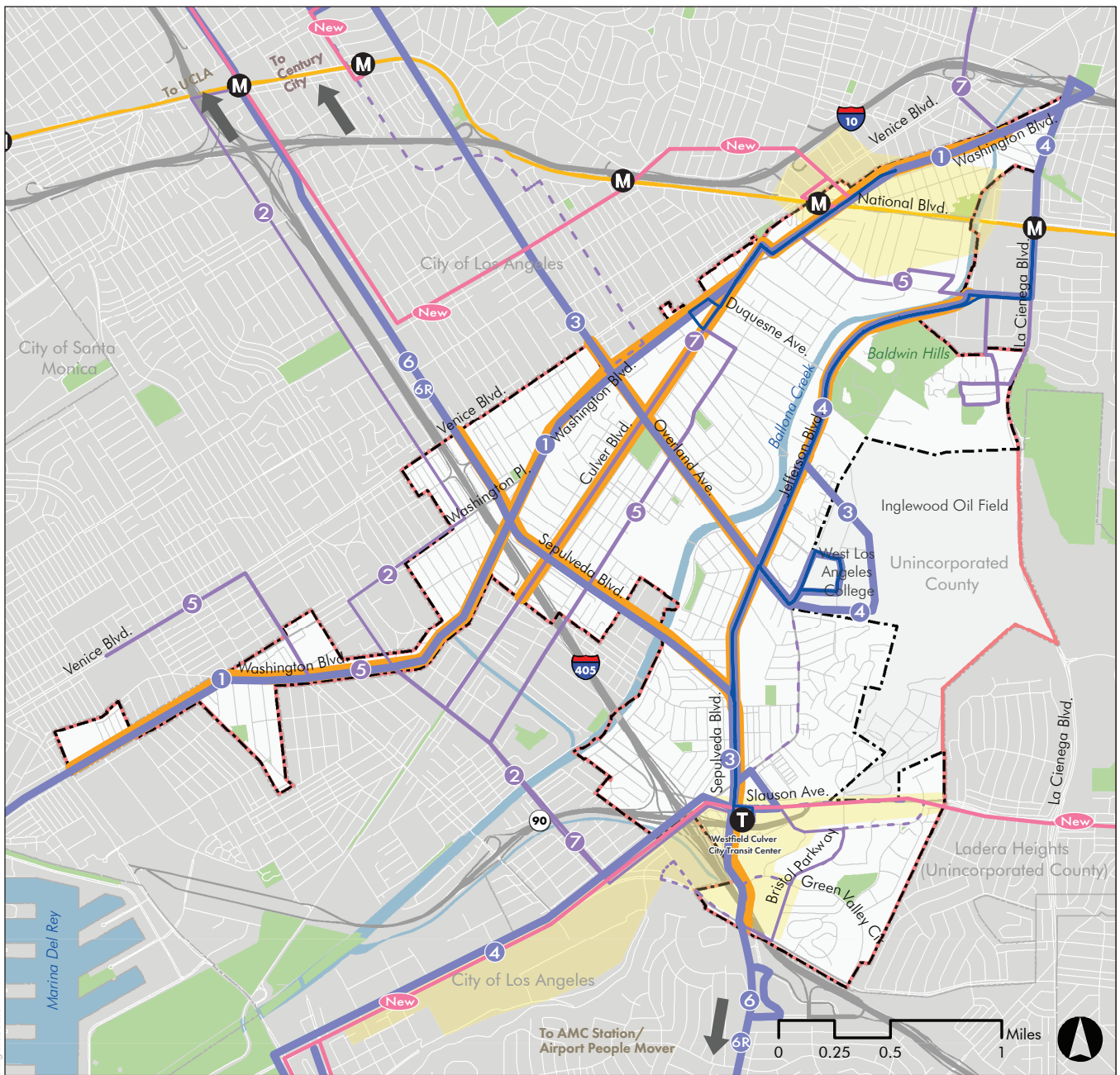
The Metro E Line (Expo) Culver City Station opened in 2012 and the E Line was extended to Downtown Santa Monica in 2016, providing a catalytic boost to the city's transit accessibility and viability as a location for transit-oriented development. The E Line is complemented with Culver City's CityBus fixed-route and Dial-A-Ride service, in addition to a limited number of Metro, Los Angeles Department of Transportation (LADOT) and Santa Monica Big Blue Bus (BBB) fixed-route bus services. Below is an inventory of transit services in the city, and as shown in **Figure 4.16-3, Existing and Proposed Transit Routes**.

Culver CityBus

Culver CityBus serves nearly 6 million annual riders throughout a 25.5-square-mile service area² that includes Culver City and the following Westside communities outside of the city limits: Venice, Westchester, Westwood, West Los Angeles, Palms, Playa Vista, Marina Del Rey, Rancho Park, Mar Vista, and Century City. Descriptions for Culver CityBus service are provided below, including routes, stop locations, and schedules, and are reflective of 2019 conditions (i.e., pre-pandemic).

- **CityBus Line 1** runs east to west from Washington Boulevard and Fairfax Avenue to Venice Beach. Some major destinations it serves include the West Los Angeles Transit Center, Helms Bakery District, the Metro Expo Culver City Light Rail Station, Culver City Hall, and Venice Beach. Service runs from approximately 5:40 a.m. to 11:36 p.m. on weekdays, and from 6:00 a.m. to 11:55 p.m. on weekends and holidays, with 14- to 18-minute headways during weekday peak hours and approximately 20-minute headways during weekends.
- **CityBus Line 2** is a 9.8-mile round-trip weekday community circulator connecting Washington and Lincoln Boulevards with the Fox Hills Mall and Corporate Pointe. It serves commercial and residential neighborhoods along the route and Venice High School. Service runs from 5:37 a.m. to 6:22 p.m. with one-hour headways.

² Culver City, 2023. Culver CityBus About Us. <https://www.culvercitybus.com/Culver-CityBus/About-Us>. Accessed March 2023.



- City Limits
 - Sphere of Influence
 - Metro Station
 - E Line (Expo)
 - Major Roads
 - Local Roads
 - Parks and Open Space
 - Waterbody
- Future Fixed-Route Transit and HCT Improvements**
- Existing (2020) CityBus route to maintain in the future
 - Existing (2020) CityBus route proposed for improved frequency
 - Existing (2020) CityBus route proposed for future realignment
 - New CityBus route
 - Transit Priority Corridor
- Circulators**
- Downtown and Jefferson Circulators
- Microtransit**
- Service Areas

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SOURCE: Mobility Element, 2023

Culver City General Plan 2045

Figure 4.16-3
Existing and Proposed Transit Routes



- **CityBus Line 3** serves Century City, Palms, West Los Angeles College, Fox Hills, and the Corporate Pointe area of Culver City. Service runs from 5:20 a.m. to 11:38 p.m. on weekdays and from 5:40 a.m. to 11:38 p.m. on weekends, with 18- to 26-minute peak period headways on weekdays and 30- to 40-minute headways on weekends.
- **CityBus Line 4** is a 16.4-mile route providing connections to several transit hubs including Westfield-Culver City Transit Center, West Los Angeles Transit Center, and Expo Line Light Rail La Cienega Station. This line serves key destinations, including West Los Angeles College and Culver City Park. Service runs from 5:37 a.m. to 9:10 p.m. on weekdays and on Saturdays from 5:40 a.m. to 9:12 p.m. with 40- to 50-minute headways.
- **CityBus Line 5** is a weekday community circulator route that connects Inglewood and Washington Boulevards with Blair Hills via Braddock Drive. Destinations include Culver City Junior and Senior High Schools, downtown Culver City, the Hayden Industrial Tract, and La Cienega Boulevard. Service is specifically tailored to school schedules, so students can take the bus before and after school. Service runs one westbound trip from 7:15 a.m. to 7:44 a.m. and two eastbound trips from 2:40 p.m. to 3:58 p.m. on weekdays.
- **CityBus Line 6** runs north and south along the Sepulveda corridor from Westwood and UCLA to the Metro Green Line Station at Aviation Boulevard and Imperial Highway. Service runs from 5:00 a.m. to 12:53 a.m. weekdays and from 5:40 a.m. to 12:05 a.m. on weekends, with 17- to 23-minute headways during weekday peak hours and approximately 23-to-30-minute headways during weekends.
- **CityBus Rapid 6** runs a similar route to Line 6 and travels along the Sepulveda corridor from UCLA through Westwood to the Metro Green Line Aviation Station. It has limited stops at major intersections and does not directly service the Howard Hughes Center and the Westfield-Culver City Transit Center. The route only operates on weekdays from 5:45 a.m. to 8:57 p.m. with 10- to 30-minute headways.
- **CityBus Line 7** runs primarily along Culver Boulevard and connects downtown Culver City with the Fisherman's Village in Marina Del Rey. Some major destinations it serves include the Robertson Transit Hub, Metro E Line Culver City Station, City Hall, Culver City Senior Center, Veterans Memorial Park, and the Fisherman's Village in Marina del Rey. Service runs from 5:20 a.m. to 9:16 p.m. on weekdays, with headways of 40 to 50 minutes.

Big Blue Bus

Santa Monica's BBB Line 17 connects the Metro E Line Culver City Station to UCLA in Westwood daily, with 20-minute headways on weekdays and 30-minute headways on weekends. In addition, there are other BBB bus lines that intersect with or operate adjacent to the Culver City boundary including BBB Lines 3, Rapid 3, Rapid 12, and 16.

Los Angeles Department of Transportation

LADOT Commuter Express 437 also serves Culver City and provides connections to Downtown Los Angeles. It is a peak hour directional service that shuttles passengers to Downtown Los Angeles in the morning and brings them back to the westside in the afternoon.

LA Metro

Seven Metro bus routes serve Culver City daily, with four out of the five routes stopping at the Culver City Transit Center at Westfield Mall, which offers transfers to other service providers. The E Line light-rail connects Culver City with Downtown Santa Monica, West Los Angeles, the University of Southern California, and Downtown Los Angeles. Metro bus Line 108 connects passengers at the Metro rail Slauson A (Blue) Line station with the Venice Pier. Line 110 stops at Metro A Line Florence Station, and Line 217 serves the Kaiser Permanente Hospital, the Grove, several museums, and the Howard Hughes Center. Line 33/733 connects Culver City with Santa Monica and Union Station in Downtown Los Angeles. Line 35 connects Culver City with Downtown Los Angeles. Line 358 serves the same route as Line 108, but it does not run on weekends. Line 17 also runs only during the week and travels from Downtown Los Angeles to Century City. Line 780 connects Culver City with Hollywood, Los Feliz, Glendale, Eagle Rock, and Pasadena and only runs on weekdays.

4.16.3 Regulatory Framework

This section provides the relevant federal, state, regional, and local regulations applicable to the Project.

Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (U.S.C.), beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

America’s Transportation Infrastructure Act of 2019

America’s Transportation Infrastructure Act of 2019 authorizes \$287 billion for the Highway Trust Fund over five years in investments to maintain and repair America’s roads and bridges. The legislation includes provisions to improve road safety, accelerate project delivery, improve resiliency to disasters, reduce highway emissions, and grow the economy.

State

California Department of Transportation

Caltrans implements state planning priorities in all plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact state highway facilities. Pursuant to Public Resources Code (PRC) § 21092.4, for projects of statewide, regional, or area-wide significance, the lead

agency must consult with transportation planning agencies and public agencies that have transportation facilities which could be affected by a project.

California Transportation Plan 2050

The California Transportation Plan (CTP 2050) was published in 2021 in accordance with the requirements of Senate Bill 391. Within the context of growing climate concerns and a global pandemic affecting the way we live, work, and travel, CTP 2050 reinforces transportation and land use strategies that aim to improve the movement of people and goods. The plan demonstrates how California can achieve a transportation system that meets statewide policy objectives to meet goals around climate, equity, public health, and more.

The plan includes specific goals and objectives for eight interrelated transportation priorities, including:

- ***Safety:*** Provide a safe and secure transportation system
- ***Climate:*** Achieve statewide GHG emissions reduction targets and increase resilience to climate change
- ***Equity:*** Eliminate transportation burdens for low-income communities, communities of color, people with disabilities, and other disadvantaged groups
- ***Accessibility:*** Improve multimodal mobility and access to destinations for all users
- ***Quality of Life & Public Health:*** Enable vibrant, healthy communities
- ***Economy:*** Support a vibrant, resilient economy
- ***Environment:*** Enhance environmental health and reduce negative transportation impacts
- ***Infrastructure:*** Maintain a high-quality, resilient transportation system

Through the CTP 2050 recommendations, California's communities can benefit from sustainable strategies that reduce emissions, improve equity, and spur economic growth, through the expansion of multi-modal transportation options that improve accessibility and safety.

Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, Caltrans, which administers transportation programming for the state, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

Assembly Bill 32/Senate Bill 32

On September 27, 2006, Governor Schwarzenegger approved AB 32, the California Global Warming Solutions Act of 2006. The purpose of AB 32 is to require a sharp reduction in greenhouse gas (GHG) emissions and set the stage for a sustainable future. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, a reduction of 15 percent below emissions expected under a “business as usual” scenario. AB 32 requires the California Air Resources Board (CARB) to develop regulations and market mechanisms to meet the GHG emission reduction targets.

On September 8, 2016, Governor Brown approved Senate Bill (SB) 32. The purpose of SB 32 is to set additional GHG emission reduction targets following the California Global Warming Solutions Act of 2006. SB 32 requires CARB to ensure that GHG emissions are reduced to 40 percent below the 1990 level by 2030. (See Section 4.7, Greenhouse Gas Emissions, for further discussion regarding GHG regulatory framework.)

Senate Bill 375

On September 30, 2008, Governor Schwarzenegger approved SB 375. The purpose of SB 375 is to coordinate transportation and land use planning to reduce GHG emissions. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt Sustainable Communities Strategies (SCS) as part of the Regional Transportation Plan (RTP) to achieve goals for the reduction of GHG emissions from automobiles and light trucks in the region. SB 375 also requires CARB to work with MPOs to provide each region with GHG reduction targets for 2020 and 2035 by September 30, 2010. The bill requires transportation planning and programming activities by the MPOs to be consistent with the SCS. To the extent the SCS is unable to achieve the GHG reduction targets set by CARB, MPOs are required to prepare an alternative planning strategy to the SCS showing how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures and policies. CARB is required to review each MPOs SCS and alternative planning strategy to determine whether the strategy would achieve GHG emission reduction targets.

Senate Bill 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) process for several categories of development projects including the development of infill projects in transit priority areas and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions. SB 743 added Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (Section 21099). Among other things, SB 743 mandates that alternative metric(s) for

determining impacts relative to transportation shall be developed to replace the use of Level of Service (LOS) in CEQA documents. Previously, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Pursuant to SB 743, the focus of transportation analysis changes from vehicle delay to VMT. The Office of Planning and Research (OPR) released two rounds of draft proposals for updating the CEQA Guidelines related to evaluating transportation impacts and, after further study and consideration of public comment, submitted a final set of revisions to the Natural Resources Agency in November 2017. This was followed by a rulemaking process that would implement the requirements of the legislation. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required beginning on July 1, 2020.

Regional

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG’s prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for 4 percent of SCAG’s total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 miles of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 miles of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020–2045 RTP/SCS’ “Core Vision” prioritizes the maintenance and management of the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the “Core Vision” include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions’ overall quality of life. These benefits include, but are not limited to, a 5 percent reduction in VMT per capita, 9 percent reduction in vehicle hours traveled, and a 2 percent increase in work-related transit trips.

Local

Circulation Element of the General Plan, 2004

The General Plan’s Circulation Element was originally adopted in 1995 and many goals, policies, and objectives are still reflective of that time. Minor amendments were made to establish policies governing development along Ballona Creek in 2004. The element sets a vision for mobility around revitalizing the local street system and reduce vehicular travel and will be updated as part of the General Plan Update.

Neighborhood Traffic Management Program, 2004

The Neighborhood Traffic Management Program (NTMP) aims to improve the quality of life in the City’s neighborhoods by implementing transportation solutions to make streets safer and more comfortable. The NTMP allows Culver City residents and the City to work together to address traffic problems, such as speeding or cut-through traffic, on local streets by considering various traffic calming solutions.

Ballona Creek Greenway Plan, 2010

The Ballona Creek Greenway Plan summarizes several design opportunities focusing on trail connections, gathering and entry points, stormwater mitigation, and street design. Recommendations specific to Culver City include improving connections to local parks by integrating Ballona Creek with nearby Culver City neighborhoods using urban forestry and greenway landscaping combined with complete street updates. The 2011’s Greenway Projects is a follow-up exploration of a natural trail along the Adams Channel.

Culver City Bicycle/Pedestrian Safety Assessment, 2014

The objectives of the Culver City Bicycle/Pedestrian Safety Assessment are to improve pedestrian and bicyclist safety, enhance walkability and bike-ability, and to increase accessibility for all pedestrians and bicyclists. The study analyzed the City’s existing and future pedestrian and bicycle demands, which included local Safe Route to School programs, the 2010 Bicycle Pedestrian Master Plan, and the review of collision data. This study focused on identifying opportunities to build on these existing efforts and offered recommendations for potential improvements. Walking and bicycle study areas included Washington Boulevard, Culver Boulevard, the Tri-School area, and Fox Hills Park. Additional bicycle studies were conducted at Washington Boulevard from the Metro E Line to Downtown Culver City, the Ballona Creek Bike

Path at Duquesne Avenue, and Elenda Street from La Ballona Elementary School to Farragut Elementary School.

Transit-Oriented Development Visioning Study and Recommendations, 2017

The Transit-Oriented Development (TOD) Visioning Study and Recommendations refocuses mobility planning in the TOD area to foster multi-modal connectivity and promote safe pedestrian, bicycle, transit, and automobile travel. Beginning with the Metro E Line Culver City Station, the mobility visioning study explored linkages to improve station areas connections with Downtown and with its surrounding neighborhoods. Adopted in 2017, the plan is anchored by the overarching principle to optimize viable choices for movement within Culver City for those living and working in the city. Other plan principles that inform mode-based recommendations include:

- Pedestrians first
- Capitalize on transit opportunities
- First/last mile options
- Accommodate safe bike facilities
- Optimize mobility hub
- Allocate “appropriate” space for cars

Expo-Downtown Bicycle Connector Feasibility Study, 2017

The PWD evaluated the feasibility of connecting the Metro E Line Culver City Station to Downtown Culver City with a high-quality bicycle facility to complement the City’s efforts to encourage bicycle-friendly, walkable transit-oriented development. The recommended project, which has not been implemented, would install a two-way protected bike lane on Washington Boulevard connecting to the Expo Bike Path at Wesley Street, Culver City Station, and Town Plaza in Downtown Culver City. The project would also install a two-way protected bike lane on Robertson Boulevard from Washinton to Venice Boulevard to connect to the Expo Phase II Bike Path north of Venice. Similar protected two-way cycle track (Class IV) on Culver Boulevard connecting Duquesne Avenue where Class II bike lanes exist to Washington Boulevard.

Reimagining Fox Hills, 2019

In 2014, the City launched the “Reimagine Fox Hills” program to revitalize commercial property in Fox Hills, which is bounded by Slauson Avenue to the north, the 405 Freeway to the west, Centinela Avenue to the south, and the City of Los Angeles to the east. The revitalization could include the creation of a “Main Street” along Bristol Parkway with retail and restaurant uses, expanded creative office campuses, structured parking, and walkable/bike-able streets. The Economic Development Division is planning to develop a Master Plan for the Fox Hills area, which will identify market feasibility for redevelopment potential and provide a new development framework that syncs with the City’s emerging economy.

Bike Share Feasibility Study, 2017

The purpose of this study is to evaluate the feasibility of operating a bike share system in Culver City, to evaluate which system would best serve the City’s goals and interests. As a result, the

Study recommended that Culver City pursue a smart bike system in partnership with Metro. The implementation of a bike share system in Culver City would encourage bicycling as a mode of transportation and could greatly increase connections to local destinations and regional transit.

American Disabilities Act Transition Plan, 2018

The American Disabilities Act (ADA) Transition Plan aims to assess curb ramps, intersections, sidewalk barriers, and transit stops in an effort to identify facility needs, prioritize implementation and funding, and make recommendations to improve the safety and comfort of walking and wheelchair use in Culver City.

Complete Streets Policy, 2020

In January 2020, the City adopted a Complete Streets Policy intended to establish guiding principles for transportation improvements to accommodate people of all ages and abilities traveling by the different modes of transportation. The policy aims to promote healthy and sustainable multimodal mobility for Culver City residents and visitors. To accomplish this, the Policy guides the provision of a safe, convenient, and comfortable street system throughout the city that provides for the needs of road users of all ages, abilities, and backgrounds including bicyclists, pedestrians, drivers, and transit users.

Short Range Mobility Plan

The Short Range Mobility Plan FY 2022-26 (SRMP) is a five-year planning and policy document that outlines regulatory requirements, strategic performance goals and objectives, and provides a three-year financial plan for the Culver CityBus and the Culver City Transportation Department.³ The SRMP provides analysis of the current fixed route service and the impact of local and regional transit projects, and evaluation of main corridors and the on-demand services offered by Culver CityBus.

Local Road Safety Plan, 2021

This plan is a living document that identifies conditions that contribute to collisions within the City and recommends potential traffic safety improvements tailored to Culver City's unique traffic needs and issues. The plan is aligned with the US Department of Transportation Federal Highway Administration's goal to reduce transportation related fatalities and severe injuries across the transportation system and vision of zero deaths and severe injuries.

Transportation Study Criteria and Guidelines, 2020

The PWD Mobility and Traffic Engineering Division, Community Development Department Advance and Current Planning Divisions, and Transportation Department developed these guidelines for the preparation of transportation studies. The document includes thresholds and criteria for CEQA analysis and supplemental analysis for factors like traffic and transit operations, safety, and parking.

³ City of Culver City, Resolution Adopting 2022-2026 Short Range Mobility Plan, February 28, 2022.

Culver City Bicycle and Pedestrian Action Plan, 2020

Adopted in June 2020, the Culver City Bicycle and Pedestrian Action Plan establishes a long-term vision for improving walking and bicycling in Culver City by updating the previous Bicycle and Pedestrian Master Plan adopted by the City Council in 2010. Like the previous plan, this update seeks to ensure comfortable, safe, and attractive places to hike and walk so that these forms of active transportation become first choices for travelling around the city. The plan’s vision is that “Culver City will be a community where bicycling and walking provide affordable, safe, and healthy mobility options for all residents. New projects and programs will work to enhance multi-modal mobility.” Goals include access and connectivity, healthier and safer communities, affordability, collaboration, and equitability.

The Culver City Municipal Code

Sections of the City’s Municipal Code (CCMC) applicable to transportation include but are not limited to the following:

- **Section 7.05.015 (Transportation Demand and Trip Reduction Measures):** Prior to issuance of a certificate of occupancy of any new development of 25,000 gross square feet (sf) of floor area or more, the property owner shall make lasting provisions for a bulletin board, display, case, or kiosk displaying transit route, ridesharing, bicycle route, and carpool/vanpool information. Prior to the issuance of a certificate of occupancy of any new development of 50,000 gross sf of floor area or more, not less than 10 percent of the employee parking area shall be located as close as is practical to employee entrances and be reserved for potential carpool or vanpool vehicles. Additionally, preferential parking spaces reserved for employee vanpool services shall be accessible to vanpool vehicles. Furthermore, bicycle racks or other secure bicycle parking shall also be provided at a rate of four spaces for the first 50,000 sf of new development, and one space for each additional 50,000 sf. For projects of 100,000 gross sf of floor area or more, the following shall also be provided: (1) sidewalks or other designated pedestrian pathways following direct and safe routes from the external pedestrian circulation system, vehicle and bicycle parking areas and transit facilities, to each building in the development; (2) if determined necessary by the City to mitigate impacts, bus stop improvements; and (3) a safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers.
- **Section 9.04.035 (Construction):** All construction activity shall be prohibited, except between the hours of:
 - 8:00 a.m. and 8:00 p.m. Mondays through Fridays
 - 9:00 a.m. and 7:00 p.m. Saturdays
 - 10:00 a.m. and 7:00 p.m. Sundays
- **Section 17.320.020 (Number of Parking Spaces Required):** There shall be no minimum required parking for any use, except as may be determined through a Comprehensive Plan. Any parking provided voluntarily or otherwise, shall comply with the applicable development standards.
- **Section 17.320.030 (Accessible Parking):** Parking spaces for persons with disabilities shall be provided in compliance with the Uniform Building Code and the Federal Accessibility

Guidelines. Accessible parking spaces shall count toward fulfilling the parking requirements of this Chapter.

- **Section 17.320.050.B (Loading Area Requirements):** Non-residential buildings meeting specified floor area as well as vehicle accessibility criteria shall include on-site loading areas.

4.16.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- | | |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Threshold TR-1: | Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities; |
| Threshold TR-2: | Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b); |
| Threshold TR-3: | Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); |
| Threshold TR-4: | Result in inadequate emergency access. |

Methodology

A memorandum was prepared by Fehr & Peers to evaluate the potential transportation impacts of the Project. The memorandum is provided in Appendix G of this PEIR. The results of the study are incorporated into the below analysis and include a review of consistency with the City's plans, programs, ordinances, and policies; a VMT analysis; a geometric hazards evaluation; and an evaluation of emergency access. Methodology utilized to determine significance for each topic is described in further detail below.

Project Impact Analysis

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy

Threshold TR-1: The Project would have a significant impact if future development allowed by the 2045 General Plan would conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.

Impact TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact would be less than significant.

Under CEQA, a project is considered consistent with an applicable program, plan, ordinance, or policy if it is consistent with the overall intent of the policy and would not preclude the

attainment of its primary goals. This analysis is performed to determine whether the proposed General Plan 2045 would conflict with an adopted program, policy, plan, or ordinance that is adopted to protect the environment. Any inconsistency with adopted policy is only a significant impact under CEQA if the plan, ordinance, or policy were adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

The CEQA thresholds of significance for transportation and traffic impacts have shifted in recent years. In the past, transportation analysis focused on the metric of LOS, which measured congestion at local intersections and roadway segments. The emphasis of these past studies was to ensure that the street grid network functioned well and allowed for efficient movement of vehicles. The current focus is to encourage active transportation (e.g., pedestrians, bicyclists, etc.) and transit, and to limit increases in VMT (see also Impact TR-2 below). This analysis was also conducted with review of the Culver City Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and the Local Road Safety Plan.

The Planning Area contains existing non-vehicular transportation, such as pedestrian and bicycle facilities and transit services as detailed above in Section 4.16.2, *Environmental Setting*. Implementation of the General Plan 2045 would improve connections to local and regional transit services (Policy M-2.3) and encourage the use of alternative modes of transportation (Policy M-5.2), including walking and biking through supportive land use development.

The roadway network in Culver City is considerably built out, such that no roadway capacity improvements (lane additions, lane widening, medians) are proposed that would change the functional classification of the roadway network. The General Plan 2045 contains goals and policies in support of the expansion of a multi-modal network (Goal M-5). In addition, the General Plan 2045 includes policies to install and improve bike lanes (Policy M-2.2) and improve public transportation services (Policy M-4.1).

The General Plan 2045 would not preclude the implementation of the Short Range Mobility Plan, and would provide complimentary goals, policies, and implementation actions that would include transit improvements (Goal M-3). Additionally, the Mobility Element would support and complement the measures, objectives, and policies in the City's Bicycle and Pedestrian Action Plan (Policies M-2.1, M-2.2, M-4.4, M-8.5). Further, the Mobility Element places an emphasis on Complete Streets and a layered transportation network consistent with the City's Complete Streets Policy (Goal M-2). The City's Local Road Safety Plan (LRSP) establishes a series of goals and objectives to identify high-risk roadways and create continued safety. The Mobility Element would establish the goal of providing a transportation network that is safe and accessible for all travel modes (Goal M-1). As the Mobility Element aims to provide more reliable, safe, affordable, convenient, clean, and connected mobility options for people of all ages and abilities, it is consistent with the goals and objectives outlined in the CTP 2050 as described above.

The General Plan 2045 would enable the City to improve bicycling programs and infrastructure throughout the City, providing connections to the existing and proposed bicycle network.

Supporting policies include Policies M-2.1, M-4.4, and M-7.4, which would identify gaps in the existing bicycle network and prioritize multimodal projects, provide additional bicycle parking, and implement bicycle detection at crossing signals. Implementation of the General Plan 2045 would also enhance pedestrian infrastructure by providing improvements to existing pedestrian facilities, constructing planned pedestrian facilities, and prioritizing pedestrian safety.

New trips and increased VMT may affect the operation of existing transit services or routes. Several policies and goals included in the Mobility Element address these impacts by balancing the multimodal transportation network to provide alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation to minimize the potential for negative effects. The goals and policies in the Mobility Element would be consistent with the City's existing Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and Local Road Safety Plan. Based on the availability of non-vehicular transportation options for the community outlined above and the Mobility goals and policies provided in the General Plan 2045, the Project would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and the impact would be less than significant.

Zoning Code Update

The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities and intensities, setbacks, and heights. The Zoning Code Update would not affect the plans, policies, and ordinances related to transportation. Therefore, the Zoning Code Update would result in a less-than-significant impact.

Applicable Proposed General Plan Goals and Policies

Mobility Element

Goal M-2: Complete streets. A layered transportation network that is complete and convenient for all travel modes and serves the greatest public good.

M-2.1: Prioritize multimodal projects. Guide project selection and delivery based on complete streets principals and addressing the gaps identified by Bicycle Network Assessment Areas, the Bicycle and Pedestrian Action Plan (BPAP) and American with Disabilities (ADA) Transition Plan.

M-2.2: Cohesive active travel network. Ensure bikeways are integrated with regional bikeways that connect with employment centers and other key land uses and destinations.

M-2.3: Transit priority lanes. Evaluate Implementing transit priority lanes and other speed and reliability improvements on roadways meeting transit priority corridor thresholds.

M-2.4: Street space and public realm design. Prioritize allocating street space and public realm designs that advance sustainable transportation, increase safety, expand public space, enhance placemaking, and foster local business activity.

M-2.5: Multimodal connectivity. Transform traditional bus stops into mobility centric locations that provide easy access and hassle-free connectivity between modes of transportation.

M-2.6: Update and maintain street classifications. Reclassify the Roadway Classification table every three to five years based on modal priorities and corresponding land uses to achieve more equitable use of roadway space.

Goal M-4: Equitable access. A transportation system that provides affordable or free, equitable, and efficient access to employment centers, residential communities, schools, and other essential services.

M-4.1: Integrated public transportation services. Manage and operate integrated public transportation services, other multimodal mobility services, and resources to provide convenient and reliable options for daily trips.

M-4.2: First/last-mile barriers. Prioritize investments that reduce first/last-mile barriers to transit stops and encourage alternative transportation options for daily activities and/or improve access to high quality jobs.

M-4.3: Access to mobility in SB 1000 Priority Neighborhoods. Improve access to mobility services and implement multimodal improvements in Senate Bill 1000 Priority Neighborhoods.

M-4.4: Bicycle parking. Provide secure and covered bicycle parking at key destinations, including all public parking garages.

M-4.5: Equitable transit access. Work with transit agencies to enhance services in areas lacking convenient transit access, including increased service frequency and spans.

M-4.6: Accessible pedestrian facilities. Construct pedestrian facilities, including sidewalks and controlled crossings, that are ADA-compliant and connect with key land uses and regional and local transit services.

M-4.7: Mobility service geographic prioritization. Prioritize expanding alternative mobility services and resources to communities with limited access to transit and developing a connected multimodal network across the city.

M-4.8: Public transit and mobility service prioritization. Continue to prioritize dignified public transit and mobility services to accommodate people with mobility impairments, non-traditional schedules, and families that need flexible mobility options.

Goal M-5: Sustainable and accessible transportation system and transit-oriented communities. A sustainable and accessible transportation system that provides great multi-modal travel experience for residents, workers, and visitors through mobility planning, transportation demand management, and transit-oriented districts, corridors, and developments.

M-5.1: 2017 Transit-Oriented Development (TOD) Visioning Study and Recommendations. Continue to implement the 2017 TOD Visioning Study and Recommendations.

M-5.2: Mobility paradigm shift. Shift the mobility paradigm toward sustainable modes by offering equitable alternative mobility choices and transforming the multimodal

travel experience. Implement multimodal street transformations with expanded sustainable mobility services, and other strategies to improve the travel experience.

M-5.3: Transportation demand management implementation. Deploy TDM measures citywide to shift the mobility paradigm by promoting and incentivizing the use of non-drive alone and sustainable mobility options.

M-5.4: Transportation demand management requirements. Require employers and new developments to effectively reduce the number of single-occupancy vehicle trips they generate and ensure safe and comfortable access for the local multimodal network, including promoting and incentivizing the use of transit, walking, and cycling over driving.

M-5.5: Traffic congestion and parking management. Proactively manage traffic congestion and parking at major destinations and job centers.

M-5.6: Off-street parking. Allow flexible approaches to providing off-street parking, including sharing spaces between different uses.

M-5.7: Parking management and dynamic parking strategies. Deploy parking management strategies and explore dynamic parking pricing strategies, like parking rates that fluctuate based on peak parking demands, to manage parking, improve transit-oriented districts, and support the mobility paradigm shift.

M-5.8: Funding sources for multi-modal investment projects. Leverage appropriate and eligible alternative funding sources including the Mobility Improvement Fee and assessment districts to support multimodal projects and mobility services in transit priority areas and transit priority corridors.

Goal M-7: Technology. New transportation technology is proactively leveraged and managed to achieve equitable access, provide high-quality mobility services, achieve efficient operations, and yield sustainable transportation outcomes.

M-7.1: Emerging mobility. Seek and leverage new transportation technologies that support new forms of transportation or business models while continuing to provide safe and effective mobility services.

M-7.2: Micromobility management. Continue to regulate and manage micromobility within the city and establish strategic partnerships and pilots with the mobility industry and community organizations that increase access to mobility options, including the regional transit network.

M-7.3: Last-mile delivery platforms. Monitor, promote, and regulate the use of sustainable, last-mile delivery technologies and strategies such as micro-distribution hubs, delivery lockers, and smaller-vehicle electric delivery fleets, including cargo bicycles.

M-7.4: Intelligent Transportation System (ITS). Continue to deploy existing and new technologies that help streamline operation protocol to achieve costing-saving and/or high operating efficiency will prioritizing the movements of modes with higher people moving capacity. ITS measures may include transit signal priority to enhance the efficiency of transit vehicles, pedestrian and bicycle detection at signals, and incident management to minimize delay with traffic operations.

M-7.5: Parking and curb management. Continue to deploy advanced parking management techniques, such as the real-time parking information signs in the Downtown area, to make parking more efficient and minimize unnecessary auto traffic circulation. Evaluate and implement performance monitoring and evaluation systems, such as digitizing curbside assets, to dynamically manage evolving curbside demands.

M-7.6: Mobility platforms. Seek and leverage new transportation technologies that aim to improve user experience and encourage the use of alternative modes of transportation including continued investment in online platforms and customer service interface applications that promote and encourage using Culver City mobility services.

M-7.7: Shared mobility data sharing. Require private operators of shared mobility devices to provide real-time information of their vehicles' availability and parking location.

M-7.8: Equitable mobility technology. Ensure that mobility solutions and technologies are designed and deployed to prioritize equity by reducing barriers to access in disadvantaged communities and Senate Bill 1000 Priority Neighborhoods, with consideration for those residents who may have physical disabilities or other barriers to access.

M-7.9: Caltrans coordination. Continue to coordinate with Caltrans to advance the implementation of congestion management and incident management solutions on I-10 and I-405 to reduce passthrough traffic.

Goal M-8: Active Transportation. An active transportation network that supports healthy living and expands access to social determinants of health.

M-8.1: Transportation improvements and physical ability. Prioritize transportation investments that provide regular physical activity and access to healthcare and social services, schools, employment, and retail.

M-8.2: Active modes of travel to parks, recreation facilities, open spaces, and trails. Improve access of active modes of travel to parks, recreation facilities, open space, and trails.

M-8.5: Bicycle and Pedestrian Action Plan (BPAP) alignment. Align with the BPAP and expand the network recommendations as needed to facilitate a complete and interconnected citywide active transportation network.

M-8.6: Multimodal project performance. Evaluate multimodal project performance and mode shift after implementation of projects based on Key Performance Indicators.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to conflicts with programs, plans, ordinances, or policies addressing the circulation system.

Conflict with CEQA Guideline Section 15064.3, Subdivision (b)

Threshold TR-2: The Project would have a significant impact if future development allowed by the 2045 General Plan would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).

Impact Statement TR-2: The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). As there are no feasible mitigation measures, the impact would be significant and unavoidable.

Previously, CEQA analysis for traffic impacts was conducted using the metric of LOS, which measures congestion at local intersections and roadway segments. The emphasis of past studies was to ensure that land use development projects would not hinder acceptable operations of the street network and efficient movement of vehicles. However, in 2013, SB 743 was passed by the California legislature and signed into law by the governor. SB 743 requires that LOS, which measures congestion and vehicle delay, no longer be used as the performance measure for the determination of transportation impacts in studies conducted under CEQA. Instead, VMT is used as the metric for evaluating transportation impacts.

The CEQA thresholds of significance for transportation impacts are intended to encourage the use of active transportation and transit, and to limit increases in VMT. Land development patterns, including the density and mix of land uses, coupled with the accessibility or alternative modes of transportation (e.g., presence of pedestrian and bicycle infrastructure, transit services), have a direct effect on the number, and length, of vehicle trips, which determine the amount of VMT generated by a project. Efforts to reduce VMT may include TDM strategies and the implementation of capital improvement projects that improve mobility and accessibility for active transportation and transit users. As discussed above, Culver City Municipal Code Section 7.05.015, which requires a TDM program, includes measures that aim to reduce the number of vehicle trips that would occur in the City as a result of new development of 25,000 gross square feet or more.

Fehr & Peers conducted a VMT assessment of the entire Culver City, using the Culver City Citywide Travel Demand Forecasting Model to obtain daily vehicle trips, daily VMT, and VMT per capita metrics. The General Plan 2045 would result in a significant VMT impact if the average daily VMT per Capita, Daily VMT per Employee, and total VMT per service population exceeds 15 percent below the corresponding City Baseline.

Table 4.16-1, *General Plan 2045 Buildout VMT Metrics*, demonstrates that at buildout the development resulting from the General Plan 2045 would result in an average daily VMT per capita, VMT per employee, and total VMT per service population above the 15 percent threshold. As shown in Table 4.16-1, the General Plan 2045 buildout would represent a 0.95 percent decrease in residential VMT per capita compared to the existing conditions, a 7.26 percent decrease in work VMT per employee compared to existing conditions, and a 3.60 percent increase in total daily VMT per service population. However, the reduction in VMT metrics resulting from the General Plan 2045 buildout would not be sufficient to be below the

15 percent reduction threshold of significance. Even with implementation of all goals and policies contained in the Mobility Element that would promote transit priority lanes, multimodal connectivity, integrated public transportation services, and prioritize public transit and mobility service such as Policies M-2.3, M-2.5, M-4.1, and M-4.8, the proposed General Plan 2045 would not meet the 15 percent VMT reduction threshold. Thus, buildout of the General Plan 2045 would result in significant VMT impacts. There are no feasible mitigation measures available.

**TABLE 4.16-1
GENERAL PLAN 2045 BUILDOUT VMT METRICS**

VMT Metrics	2019 City Baseline	2019 City VMT Threshold (15% Below 2019 City Baseline)	GPU Buildout	Percent Difference – GPU Buildout vs. 2019
Residential VMT per Capita	8.30	7.06	8.23	-0.95%
Work VMT per Employee	10.12	8.60	9.39	-7.26%
Total Daily VMT per Service Population	22.45	19.09	23.26	3.60%

SOURCE: Fehr & Peers 2024

Zoning Code Update

The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities and intensities, setbacks, and heights. As with the General Plan, the Zoning Code Update would locate higher density within proximity of transit and would provide for mixed-use development, which serves to reduce VMT. However, as discussed above, the Project would result in a significant VMT impact. Applicable Proposed General Plan Goals and Policies

Mobility Element

Goal M-3: Transit and other mobility services. Frequent, reliable, and high-quality public transit and mobility services that are adaptable for the dynamic future of mobility needs, markets, and solutions. Travel behavior shifts from driving to more sustainable modes by establishing comprehensive and high-quality mobility service options and infrastructure. High-quality public transit and mobility services to accommodate the city’s growth in population, jobs, and economy.

M-3.1: Regional mobility coordination. Improve and influence regional mobility service quality and ensure that Culver City community members are connected to regional mobility options and resources by continuing to coordinate with Metro and other municipal mobility service providers.

M-3.2: Mobility funding. Work with regional partners and elected representatives to continually seek regional, state, and federal funding for mobility services and infrastructure.

M-3.3: Mobility options. Continually improve and innovate existing, directly-operated mobility services including CityBus and CityRide services and manage and/or collaborate with mobility service providers to provide and improve other mobility services.

M-3.4: High-quality transit service. Prioritize capital investments and improvements that align with Culver City's SMRP, regional studies, and LA Metro's L RTP to enhance transit reliability and rider experience to make transit competitive with driving.

Mitigation Measures

No feasible mitigation measures are available to reduce impacts related to VMT.

Level of Significance after Mitigation

The Project would result in significant and unavoidable impacts related to VMT. No feasible mitigation measures are available to reduce the severity of this impact.

Introduce Incompatible Uses

Threshold TR-3: The Project would have a significant impact if future development allowed by the 2045 General Plan and Zoning Code Update would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Statement TR-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) and impacts would be less than significant.

The General Plan 2045 does not specify design features for the transportation system in the Planning Area and would thus not substantially increase hazards due to a design feature. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Planning Area and may include safety, operational, or capacity impacts that must be assessed. Given the programmatic nature of the Project, these are evaluated at the program/citywide level.

The land use diagram and policies contained in the General Plan 2045 emphasize transition areas and buffers between land uses of varying intensity, which would serve to reduce potential conflicts between users of the transportation system connected with each land use, including commercial and industrial truck traffic, commute traffic, pedestrians, and cyclists. The specific design and operations of individual future development projects are unknown at this time; however, policies included in the General Plan 2045 would serve to reduce potential impacts from future development.

Access locations for development allowed under the General Plan 2045 would be designed to the City's standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to meet the City's requirements to protect pedestrian safety. The installation of street trees and other potential impediments to adequate driver and pedestrian visibility in the public right-of-way would require review for sight distance and be designed to City standards and best practices to avoid obstructions. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets. The General Plan 2045 has been developed with an emphasis on multi-modal street networks, which would improve compatibility between different transportations modes and between the

transportation system and adjacent land uses. Proposed policies that promote bicycle and pedestrian safety would help identify and address potential safety concerns. Additionally, the General Plan 2045 would advance strategies for thoughtful infill development, which would itself provide safety benefits by reducing motor vehicle collision exposure, lowering speeds, and increasing pedestrian and cyclist volumes.

The various goals and policies contained within the Mobility Element are designed to address transportation safety, improve circulation, implement transportation projects, and advance current City plans, policies, programs, and ordinances. The transportation projects included in the Mobility Element are envisioned to improve mobility, safety, and access, and thus would be designed to applicable federal, state, and City Engineering Design Standards or other applicable roadway standards. As a result, the General Plan 2045 would not substantially increase hazards due to a geometric design feature or incompatible use, and this impact is considered less than significant.

Zoning Code Update

The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities and intensities, setbacks, and heights. The Zoning Code Update would not amend the City's standards or review processes regarding sight distance, sidewalk widths, crosswalks, or movement controls related to transportation. Therefore, impacts related to hazardous conditions would be less than significant.

Applicable Proposed General Plan Goals and Policies

Mobility Element

Goal M-1: Safety. A transportation network that is safe and accessible for all travel modes and people of all ages, physical abilities, and financial means.

M-1.1: Safe systems approach. Implement strategies to reduce severe and fatal traffic collisions and improve overall traffic safety conditions.

M-1.2: Priority Safety Corridors. Maintain regular updates every three to five years to the Local Road Safety Plan (LRSP) that identifies a High Injury Network (HIN), also identified as Priority Safety Corridors, and location-specific safety improvements.

M-1.3: Improve transportation network safety. Design transportation network improvements with the most vulnerable users in mind to ensure the transportation network is accessible to all travelers regardless of age, race, gender, or ability.

M-1.4: Safe travel programs. Implement programs that increase awareness of safe travel practices.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to hazardous conditions.

Result in Inadequate Emergency Access

Threshold TR-4: The Project would have a significant impact if future development allowed by the Project would result in inadequate emergency access.

Impact Statement TR-4: The Project would not result in inadequate emergency access and impacts would be less than significant.

The General Plan 2045 applies citywide and is a programmatic document. Emergency accessibility is typically assessed at a project level. Project-level review required by the City includes site access review for emergency vehicles and traffic control plans that account for emergency vehicles. As stated above, future development under the proposed General Plan 2045 would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable. The City's development review process would ensure that future development under the General Plan 2045 would be consistent with these policies and would not hinder emergency access for individual sites. For these reasons, the General Plan 2045 would not result in inadequate emergency access, and this impact is considered less than significant.

Zoning Code Update

The Zoning Code Update would create the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities and intensities, setbacks, and heights. The Zoning Code Update would not amend the City's design guidelines that incorporate safety and emergency access needs nor the review processes. Therefore, impacts related to emergency access would be less than significant.

Applicable Proposed General Plan Goals and Policies

There are no applicable proposed General Plan Goals or Policies that relate to emergency access.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to emergency access.

4.16.5 Cumulative Impacts Analysis

By nature, the transportation analysis presented above represents a cumulative analysis of transportation conditions through 2045. Cumulative impacts are determined through consistency with the SCAG RTP/SCS, in that a Plan must demonstrate compliance with air quality conformity requirements and GHG reduction targets. The General Plan 2045 buildout reallocates population and employment growth and reflects a greater amount of service population overall than is assumed in the SCAG RTP/SCS in the city area, and therefore requires a cumulative impact analysis comparing the cumulative "no project" scenario, i.e., the existing conditions,

representing RTP/SCS cumulative year conditions, to the cumulative “plus project” scenario, i.e., General Plan 2045 buildout scenario representing reallocation of the population/employment growth associated with implementation of the General Plan 2045 in the city area.

The General Plan 2045 would have a cumulative impact if average daily VMT per capita and VMT per employee at buildout would exceed the corresponding VMT metrics, and if total VMT would exceed the total VMT for the existing conditions. The daily VMT per capita, per employee, and per service population for the existing conditions and buildout of the General Plan 2045 demonstrate that all the VMT metrics are lower in the General Plan 2045 buildout scenario than the existing conditions, indicating that the General Plan 2045 buildout scenario has no cumulative impact on VMT. As shown in **Table 4.16-2, Cumulative VMT Metrics**, the General Plan 2045 buildout would represent a 4.26 percent decrease in residential VMT per capita compared to the existing conditions, a 4.59 percent decrease in work VMT per employee compared to the existing conditions, and a 6.39 percent decrease in total daily VMT per service population. The resulting cumulative VMT impact would be less than significant, as shown in Table 4.16-2.

**TABLE 4.16-2
 CUMULATIVE VMT METRICS**

VMT Metrics	General Plan 2045 Baseline	General Plan 2045 Buildout	Percent Difference – Buildout vs. Baseline
Residential VMT per Capita	8.59	8.23	-4.26%
Work VMT per Employee	9.84	9.39	-4.59%
Total Daily VMT per Service Population	24.85	23.26	-6.39%

SOURCE: Fehr & Peers 2024

It is possible that traffic generated by future development in the region could conflict with a program, plan, ordinance, or policy addressing the circulation system, thus resulting in a potentially significant cumulative impact. However, given the Project’s consistency with the various local, regional, and state regulatory frameworks that are in place, the Project’s contribution to this cumulative impact would not be cumulatively considerable.

Additionally, it is possible that traffic generated by future development in the region could substantially increase hazards due to a geometric design feature or incompatible use, thus resulting in a potentially significant cumulative impact. The General Plan 2045 includes policies which emphasize transition areas and buffers between land uses of varying intensity, which would serve to reduce potential conflicts between users of the transportation system connected with each land use. The General Plan 2045 has also been developed with an emphasis on multi-modal street networks which would improve compatibility between different transportation modes and address potential safety concerns. As described above, future development under the Project would be compliant with the City’s design guidelines where applicable. The Project’s contribution to this impact would not be cumulatively considerable. The Project would result in less-than-significant cumulative impacts related to transportation.

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4.17 Tribal Cultural Resources

4.17.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on tribal cultural resources from future development allowed under the Project. The section provides context regarding the Planning Area’s ethnographic setting and includes results of a Sacred Lands File (SLF) search and the city’s consultation with the Native American community pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18.

4.17.2 Environmental Setting

Ethnographic Setting – The Gabrielino

The Planning Area is in a region traditionally occupied by Indigenous Peoples. Groups of Indigenous Peoples of Los Angeles include Gabrieleño, Gabrielino, Tongva, and Kizh. “Gabrielino” and “Gabrieleño” are Spanish names deriving from the San Gabriel Mission. “Tongva” was likely a Native village in the same vicinity. The name the Indigenous Peoples may have originally called themselves is “Kizh,” meaning home.¹ However, there is pan-tribal name for LA’s Indigenous Peoples that predates the arrival of Europeans.² For this report, the term “Gabrielino” will be used, in keeping with the state-recognized name of San Gabriel Band of Mission Indians.

Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.³ The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

At the time of Spanish contact, many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.⁴ This religion may have been relatively new when the Spanish arrived, and was spreading at that time to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation⁵ of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed

¹ Stickel, Gary E., PhD. 2016. Why the Original Indian Tribe of the Greater Los Angeles Area is Called Kizh not Tongva. Available at: https://www.cpp.edu/~tgyoung/Pom_Parks/Kizh%20not%20Tongva_9-27-17.pdf.

² Los Angeles Almanac. January 2, 2019. Original Settlers of Los Angeles. Available at: <http://www.laalmanac.com/history/hi03c.php>.

³ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

⁴ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

⁵ Inhumation is the action of burying the corpse of the dead (as opposed to cremating the remains).

through Gabrielino territory.⁶ Native Americans suffered severe depopulation, and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

A Gabrielino village, or “rancheria,” known as *Guaspeta*, *Guasna*, *Guashna*, *Guachpet*, *Guashpet*, and *Guaspita*, appears to have been located southwest of the city. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820.^{7,8} At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the vicinity of the Planning Area, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.⁹ Two archaeological sites with components dating to the Spanish era (CA-LAN-62 and -211), located within about 2 miles from the city, may be the location of Guaspeta, although this has not been confirmed in the historical record.¹⁰

Sacred Lands File Search

The California Native American Heritage Commission (NAHC) maintains a confidential SLF that contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on October 15, 2019, to request a search of the SLF. The NAHC responded to the request in a letter dated October 24, 2019, indicating that the results were positive and contact the Gabrielino Tongva Indians of California Tribal Council for more information (see Appendix G of this Draft PEIR).

Native American Consultation

Assembly Bill 52 and Senate Bill 18

On March 2, 2022, and again on February 15, 2024, the city submitted notification and request to consult letters to seven individuals and organizations pursuant to AB 52. On March 2, 2022 and February 15, 2024, the city also submitted notification and request to consult letters to seven individuals and organizations pursuant to SB 18. In particular, AB 52 and SB 18 letters were sent via certified mail to the following California Native American tribes and individuals:

- Sandonne Goad, Gabrielino/Tongva Nation
- Charles Alvarez, Gabrielino-Tongva Tribe
- Andrew Salas, Gabrieleño Band of Mission Indians—Kizh Nation

⁶ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538–549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

⁷ Reedy, Seetha N. 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. *Journal of Anthropological Archaeology*, No. 37, pp. 48–66.

⁸ McCawley, William, 1996. *The First Angelinos, The Gabrielino Indians of Los Angeles*. Malki Museum Press, Morongo Indian Reservation.

⁹ Stoll, Anne Q., John G. Douglass, and Richard Ciolek-Torrello. 2009. Searching for Guaspeta: A Mission Period Rancheria in West Los Angeles. *SCA Proceedings*, Vol. 22.

¹⁰ Reedy, Seetha N. 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. *Journal of Anthropological Archaeology*, No. 37, pp. 48–66.

- Robert Dorame, Gabrielino Tongva Indians of California Tribal Council
- Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians
- Scott Cozart, Soboba Band of Luiseño Indians
- Lovina Redner, Santa Rosa Band of Cahuilla Indians

On March 4, 2022, February 28, 2024, and March 6, 2024, the city received responses from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The Kizh Nation indicated they are in agreement with the General Plan 2045; however, if there will be ground disturbance for any or all of the future projects, they would like to request consultation.¹¹ To date, no other responses from the Native American community have been received as part of the AB 52 nor SB 18 tribal consultation effort. The AB 52 and SB 18 Native American consultation documentation is provided in Appendix H of this Draft PEIR.

4.17.3 Regulatory Framework

This section provides the relevant state regulations applicable to the Project. There are no federal, regional, or local regulations which apply to the Project.

State

Assembly Bill 52

AB 52 was approved on September 25, 2014. The act amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American Tribes early in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under the California Environmental Quality Act (CEQA). PRC Section 21074(a)(1) and (2) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria of subdivision (a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the

¹¹ Input was received from the Tribes in a letter dated March 4, 2022, a letter dated February 28, 2024 and an email dated March 6, 2024. All correspondence is contained in Appendix H of the EIR.

lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern.¹² Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.¹³

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁴

In addition to other CEQA provisions, the lead agency may certify an environmental impact report or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.¹⁵

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not apply to data or information that are, or become, publicly available, are already in lawful possession of the applicant before the provision of the information by the California Native American tribe, are independently developed by the applicant or the applicant's agents, or are lawfully obtained by the applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.¹⁶

¹² Public Resources Code, Section 21080.3.1(b) and (c).

¹³ Public Resources Code, Sections 21080.3.1(d) and 21080.3.1(e)

¹⁴ Public Resources Code, Section 21080.3.2(b)

¹⁵ Public Resources Code, Section 21082.3(d)(2) and (3)

¹⁶ Public Resources Code, Section 21082.3(c)(2)(B).

Senate Bill 18

SB 18 (Statutes of 2004, Chapter 905), which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes before making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to “provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”¹⁷

The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the Tribal Consultation Guidelines: Supplement to General Plan Guidelines, the following are the contact and notification responsibilities of local governments:¹⁸

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government’s jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county’s jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.

Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

4.17.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to tribal cultural resources if the project would:

¹⁷ Governor’s Office of Planning and Research. 2005. *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*.

¹⁸ Governor’s Office of Planning and Research. 2005. *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*.

- Threshold TCR-1:** 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 the local register of historical resources as defined in Public Resources Code Section 5020.1(k).
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Methodology

The analysis is based on a SLF search conducted by the NAHC and consultation between the city and Native American groups pursuant to AB 52 and SB 18. Specifically, the city submitted notification and request to consult letters to Native American individuals and organizations and conducted follow-up Native American consultation.

Project Impact Analysis

Tribal Cultural Resource Significance

Threshold TCR-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Impact Statement TCR-1: The Project would not cause a substantial adverse change in the significance of tribal cultural resources as all future projects would be required to comply with the provisions of SB 18 and AB 52 to incorporate tribal consultation into the CEQA process, which would ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Therefore, impacts would be less than significant.

The City submitted notification and request to consult letters pursuant to AB 52 and SB 18 to seven Native American individuals and organizations on March 2, 2022 and February 15, 2024. The City received one response from the Kizh Nation indicating that they are in agreement with the General Plan 2045; however, they also indicated that they would like to request consultation if there would be ground disturbance occurring for any and all future projects within the Planning Area.

As discussed in Section 4.4, *Cultural Resources*, of this Draft PEIR, there are 12 known prehistoric archaeological resources that have been previously identified within the Planning Area, one of which is a multicomponent resource. None of these resources have been evaluated as potential tribal cultural resources. The NAHC has indicated that the SLF results were positive and identified one resource in their database. The NAHC recommended that the City contact the Gabrielino Tongva Indians of California Tribal Council for more information on this particular resource.

Furthermore, some existing improvements within the city (e.g., roads, buildings, structures, etc.) were likely constructed prior to the existence of cultural resources protection laws and may have been built on tribal cultural resources; therefore, the current or prior existence of development throughout the city does not preclude the presence of tribal cultural resources located underneath this development.

Lastly, the city would have been a highly suitable area for the inhabitation of indigenous people. For instance, Ballona Creek, an 8.8-mile watershed that flows through the city, would have provided native inhabitants with abundant food resources in the past, such as plants and animals, and fresh water. As a result of these findings, the potential for encountering tribal cultural resources in the city is considered high.

Implementation of the General Plan 2045 may facilitate future development that would include ground-disturbance activities (e.g., excavation, trenching, boring, grading, drilling, demolition, clearing/grubbing, etc.), which have the potential to cause a substantial adverse change to tribal cultural resources. Specifically, anticipated development in the Planning Area would occur through infill development on vacant property, and through redevelopment, which could result in damage to tribal cultural resources. In addition, infrastructure improvements, such as storm water quality projects, and other improvements needed to support the projected growth and development from implementation of the General Plan 2045 that require ground disturbance could result in damage to or destruction of tribal cultural resources buried below the ground surface. Future development that results in changes to the setting through incompatible adjacent construction or facilitates public access to culturally significant sites could result in additional impacts to tribal cultural resources.

In summary, no tribal cultural resources have been identified within or adjacent to the Planning Area. However, there are unevaluated prehistoric resources within the Planning Area that could be potential tribal cultural resources and, given the prehistoric occupation of the area, it is possible that future development within the Planning Area may result in the identification of unrecorded tribal cultural resources. However, future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. General Plan Policy C-1.16 also reinforces the continuation of consultation with Native American groups per the requirements of SB 18 and AB 52. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resource are uncovered during construction in support of the City's goals for protection of cultural resources. Adherence to the regulations and implementation of proposed General Plan policies and implementation actions would ensure that the Project's impact with respect to tribal cultural resources would be less than significant.

Applicable Proposed General Plan Goals and Policies

Conservation Element

Goal C-1: Cultural Resources. Culver City's cultural resources are protected and enhanced through proactive measures.

C-1.15: Public knowledge promotion. Promote public knowledge and understanding of cultural resources (including archaeological, tribal cultural resources, historic resources, and paleontological resources) present within the city.

C-1.16: Tribal Consultation. Continue to consult with Native American groups in accordance with Senate Bill 18 and Assembly Bill 52 to identify Tribal Cultural Resources.

C-1.21: Protect Archaeological, Paleontological, and Tribal Cultural Resources. Promote programs and policies to protect known archaeological and paleontological sites and Tribal Cultural Resources.

C-1.21: Protect Archeological, Paleontological, and Tribal Cultural Resources. Promote programs and policies to protect known archeological and paleontological sites and Tribal Cultural Resources.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to tribal cultural resources.

4.17.5 Cumulative Impacts Analysis

The geographic context for the analysis of impacts related to tribal cultural resources is generally site-specific, rather than cumulative in nature, because each development site has unique tribal cultural considerations. In this way, potential cumulative impacts relating to tribal

cultural resources would be minimized on a site-by-site basis to the extent that appropriate consultation is conducted. Future development within the Planning Area and the larger Los Angeles County region, including growth anticipated through implementation of the General Plan 2045, could result in a substantial adverse change in the significance of tribal cultural resources, thus resulting in a potentially significant cumulative impact. All future development in the Planning Area and surrounding region, would be required to comply with SB 18 and AB 52 consultation, which would ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. For this reason, the Project's contribution to this potentially significant cumulative impact would not be cumulatively considerable.

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4.18 Utilities and Service Systems

4.18.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on utilities and service systems from implementation of the Project, including potential impacts related to water supplies and infrastructure, wastewater treatment (capacity and infrastructure), stormwater drainage, electric power, natural gas, or telecommunications facilities, and solid waste capacity and regulations. The section provides context regarding the Planning Area's existing water, wastewater, solid waste, electricity, natural gas, and telecommunication services, as well as relevant federal, state, and local regulations and programs.

4.18.2 Environmental Setting

Potable Water Systems

Water Service

The Planning Area's water service is provided by the Golden State Water Company (GSWC) and Los Angeles Department of Water and Power (LADWP). The two independently-operated systems are interconnected and provide the ability to share water between them if necessary. GSWC serves the majority of Culver City and LADWP serves the western portion of the Planning Area. GSWC serves the connections east of Mclaughlin Avenue, while LADWP serves the connections west of Mclaughlin Avenue.

Water Distribution Network

Both GSWC and LADWP main water lines (12-inch diameter and greater) are located within the Planning Area. As indicated above in *Water Service*, Mclaughlin Avenue demarcates the service areas, with LADWP serving the west side and GSWC serving most of the Planning Area to the east. As the primary provider to the Planning Area, the GSWC system currently serves more than 9,200 connections, distributing approximately 5,000 acre-feet (AF) of potable water annually.¹ Water distribution services in the Planning Area encompass potable pipeline networks, storage facilities, and access for fire suppression purposes. The Planning Area's fire hydrant and water storage tank network provides fire protection and includes three water storage tanks within the Baldwin Hills Scenic Overlook area. Operating and maintaining independently owned systems and upgrading the system ensures the infrastructure can support additional demand. Neither water agency serving the Planning Area has reported any operating capacity issues.

Supply

Regionally, LADWP's supply is from both imported and local water sources, including the Los Angeles Aqueduct, local groundwater, and the Metropolitan Water District of Southern California (Metropolitan). GSWC purchases its water from the West Basin Municipal Water District (WBMWD), a large water purveyor that imports its water supply from Metropolitan. The

¹ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

Metropolitan water supply comes from the Colorado River Aqueduct and the State Water Project (SWP) (California Aqueduct).

GSWC purchases water for the Culver City service area from WBMWD. GSWC entered into a 5-year purchase agreement with WBMWD, effective January 1, 2008 through December 31, 2012. The agreement was extended an additional two years to December 31, 2014. This agreement provided GSWC with an annual maximum allocation of 30,651 AFY with a total purchase commitment of 91,953 AF over the 5-year term of the agreement, shared by all of GSWC's systems served by WBMWD.

GSWC has not relied upon groundwater to serve Culver City in recent years. From 2016 to 2019, no groundwater was used to serve GSWC customers in Culver City, and in 2020, GSWC pumped approximately 0.1 AF of groundwater from the Santa Monica Subbasin (California Department of Water Resources [DWR] Basin No. 4-011.01). Nevertheless, GSWC maintains a single groundwater well, the Sentney well, in the Planning Area and may institute potential service from the Santa Monica Basin in the future upon completion of the Santa Monica Basin Groundwater Sustainability Plan (GSP) and implementing actions.² In addition, initiatives such as the One Water LA 2040 Plan are in place to reduce dependency on imported water and use alternate sources, such as recycled water systems, groundwater recharge, and upgraded treatment processes. For supply reliability, WBMWD entered into a new ten-year term purchased order with Metropolitan effective January 1, 2015 through December 31, 2024. For the first five years of the new purchased order term, Metropolitan staff recommended to not enter into agreements with its customer agencies. However, at the five-year mark, staff will reevaluate the need to have purchase order agreements with the customer agencies.

As previously indicated, Metropolitan imports water from two principal sources: northern California via the California Aqueduct and the Colorado River via the Colorado River Aqueduct. MWD also manages and owns in-basin surface storage facilities, stores groundwater within the basin via contracts, engages in groundwater storage outside the basin, and conducts water transfers to provide additional supplies for its member agencies. Metropolitan has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP and WBMWD coordinate closely with Metropolitan to ensure implementation of these water resource development plans. Metropolitan's actions have been focused on the following: continuing water conservation, developing water supply management programs outside of the region, developing storage programs related to the SWP and the Colorado River, developing storage and groundwater management programs within the Southern California region, increasing water recycling, groundwater recovery, stormwater, and seawater desalination and pursuing long-term solutions for the ecosystem, regulatory and water supply issues in the California Bay-Delta.

Metropolitan treats raw water after importing it and before delivering through three Metropolitan- WBMWD connections: WB-23, WB-24, and WB-34. The connections have

² Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

maximum capacities of 9,000 gallons per minute (gpm), 9,000 gpm, and 4,500 gpm, respectively. Four reservoirs that have a total capacity of 2.7 million gallons feed the system.

WBMWD acts as secondary wholesale water agency, purchasing water from Metropolitan and reselling it to GSWC. The water purchased from WBMWD may be managed and moved between the GSWC Culver City service area and GSWC Southwest service area, depending upon the circumstances for supply availability in each particular service area.³

Once LADWP and GSWC acquire its water, the water goes through a treatment and distribution process to connect to Culver City residents and businesses.

Demand

To operate effectively, Culver City's water infrastructure must meet current and projected future demand. Evaluating historical and current water usage helps inform future water demand projections. Southern California Association of Governments (SCAG) publishes population, employment, housing data, and a methodology to extrapolate growth projections from historical data sets. GSWC follows SCAG's forecasting processes to estimate future water demands in Culver City.

The SCAG-based water use projections are based on the population and housing growth rates. Household projections are used to determine growth in single- and multi-family service connections, while employment growth projections are used to determine growth in commercial, industrial, institutional, landscape and other service connections. Based on GSWC historical water use data, most water demand in Culver City is attributed to residential activity followed by commercial, industrial, public/institutional, and landscaping.⁴

Although Culver City is implementing measures to decrease its water use and trends depict decreased water use, population and housing growth may counter this trend. GSWC provides most of Culver City's water, which declined by 4.8 percent between 2016 and 2020.⁵ This decline may be the result of the implementation of tiered water rates, plumbing code updates, and statewide drought.

State and local legislation requires Culver City to reduce its water use. Senate Bill (SB) X7-7, the Water Conservation Act of 2009, requires a 20 percent reduction in urban per capita water use across the state by December 31, 2020. Retail water suppliers were required to report existing baseline water usage and set targets for reduction. Also, LADWP must meet the conservation

³ The Southwest Service Area currently includes 54,994 customers in Southwest Los Angeles County, including all of Gardena and Lawndale, and portions of Carson, Compton, El Segundo, Hawthorne, Inglewood, Redondo Beach, and unincorporated Athens, Del Aire, El Camino Village, Lennox and Gardena Heights. Source: Golden State Water Company, <https://www.gswater.com/southwest#:~:text=We%20currently%20serve%2054%2C994%20customers,Village%2C%20Lennox%20and%20Gardena%20Heights>. Accessed July 13, 2022.

⁴ Culver City, 2017. Water Supply Assessment Culver Studios Innovation Plan. Prepared by GSWC. <https://culvercity.prelive.opencities.com/files/assets/public/documents/planning-amp-development/current-projects/culver-studios/appendixmwatersupplyreport.pdf>. Accessed April 2023.

⁵ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

goals established in response to the multi-year California drought as outlined in the state's Executive Directive No. 5 (ED5) and Sustainable City Plan (pLAn) water conservation measures.

These measures require reducing per capita potable water use by 22.5 percent by 2025 and 25 percent by 2035, reducing imported water purchases from Metropolitan by 50 percent by 2025, and expanding all local water supply sources by at least 50 percent of the total supply by 2035. Culver City's Water Conservation Plan encourages residents to conserve water and imposes mandatory water use restrictions on LADWP and GSWC's business and residential customers.⁶

As presented in GSWC's 2020 UWMP, the Culver City service area is currently using 116 gallons of water per capita per day (GPCD).⁷ As previously indicated, LADWP serves the western portion of the Planning Area and provides its customers with a combination of imported and local water sources, including the Los Angeles Aqueduct, local groundwater, and Metropolitan. As presented in LADWP's 2020 UWMP, the LADWP service area is currently using 106 GPCD.⁸

GSWC's projected demands for potable and non-potable use within the Culver City service area are shown in **Table 4.18-1, Culver City Service Area Total Projected Water Demand**, and LADWP's projected demands for potable and non-potable use are shown in **Table 4.18-2, LADWP Total Projected Water Demand**.

**TABLE 4.18-1
 GSWC CULVER CITY SERVICE AREA TOTAL PROJECTED WATER DEMAND**

Use Type	Projected Water Use (AFY)				
	2025	2030	2035	2040	2045
Single Family	1,508	1,514	1,520	1,525	1,531
Multi-Family	1,051	1,064	1,077	1,090	1,103
Commercial/Institutional	1,897	1,933	1,969	2,006	2,044
Industrial	156	159	161	164	166
Landscape	142	165	192	223	259
Other	0	0	0	0	0
Losses	247	251	256	260	265
Total	5,002	5,086	5,175	5,269	5,370

NOTES: AFY = acre-feet per year

SOURCE: Golden State Water Company, 2021. *2020 Urban Water Management Plan: Culver City Service Area*, Table 4-6, *Projected Water Demands*.

⁶ Culver City, 2015. Water Conservation Plan for Fiscal Year 2015/2016, 2015. <https://www.culvercity.org/files/assets/public/documents/building-development/city-documents/culvercitywaterconservatio.pdf>. Accessed April 2023.

⁷ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed August 2023.

⁸ Los Angeles Department of Water and Power, 2021. 2020 Urban Water Management Plan. May 2021. https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F9314518570%2F1.%20LADWP%202020%20UWMP.pdf. Accessed April 2023.

**TABLE 4.18-2
 LADWP TOTAL PROJECTED WATER DEMAND**

Use Type	Projected Water Use (AFY)				
	2025	2030	2035	2040	2045
Single Family	228,529	233,366	237,297	242,761	246,779
Multi-Family	192,727	205,728	219,798	233,602	244,853
Commercial/Government	156,407	157,341	158,236	159,030	157,680
Industrial	13,651	12,902	12,171	11,418	10,503
Non-Revenue Water	51,321	50,826	51,334	51,026	50,687
Additional Conservation Savings ^a	133,133	133,506	142,688	143,351	144,752
Total	509,501	526,658	536,148	554,486	565,751

NOTE: AFY = acre-feet per year

^a Additional Conservation Savings includes projected future active and passive savings and additional retained passive savings.

SOURCE: Los Angeles Department of Water and Power, 2021. 2020 Urban Water Management Plan, Exhibit 2M, *LADWP Water Demand Projections by Sector*.

Water purchased from WBMWD constitutes the primary source of supply for the GSWC Culver City service area, and is expected to be the sole source of supply within the 2045 planning horizon. The total projected potable supplies for the GSWC Culver City service area for normal, single dry, and multiple dry years are presented in **Table 4.18-3, *Projected Normal Year Water Supply and Demand for Culver City Service Area***; **Table 4.18-4, *Single Dry Year Water Supply and Demand for Culver City Service Area***; and **Table 4.18-5, *Five Consecutive Dry Years Water Supply and Demand through 2045 for Culver City Service Area***, respectively. As shown in the tables, GSWC has sufficient supplies to meet demand in normal, single dry, and multiple dry years without shortages through 2045.

The WBMWD 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single dry and multiple dry years. As such, GSWC expects that under all hydrologic conditions purchased water supplies will fully meet future purchased water demands. Therefore, consistent with the Culver City service area 2020 UWMP, the available supplies to the GSWC Culver City service area are considered to be equal to demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a five-year drought period).

**TABLE 4.18-3
 PROJECTED NORMAL YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA**

Supply/Demand	Projected Water Use (AFY)				
	2025	2030	2035	2040	2045
Supply Totals	5,002	5,086	5,175	5,269	5,370
Demand Totals	5,002	5,086	5,175	5,269	5,370
Difference	0	0	0	0	0

NOTES: AFY = acre-feet per year

SOURCE: Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area, Table 5-2, *Normal and Single Dry Year Water Supply and Demand through 2045 (values in acre-feet)*.

**TABLE 4.18-4
 SINGLE DRY YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA**

Supply/Demand	Projected Water Use (AFY)				
	2025	2030	2035	2040	2045
Supply Totals	5,502	5,594	5,692	5,796	5,907
Demand Totals	5,502	5,594	5,692	5,796	5,907
Difference	0	0	0	0	0

NOTES: AFY = acre-feet per year

SOURCE: Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area, Table 5-2, *Normal and Single Dry Year Water Supply and Demand through 2045 (values in acre-feet)*.

**TABLE 4.18-5
 FIVE CONSECUTIVE DRY YEARS WATER SUPPLY AND DEMAND THROUGH 2045 FOR
 CULVER CITY SERVICE AREA**

Supply/Demand	Projected Water Use (AFY)				
	2025	2030	2035	2040	2045
First Year					
Supply Totals	5,502	5,594	5,692	5,796	5,907
Demand Totals	5,502	5,594	5,692	5,796	5,907
Difference	0	0	0	0	0
Second Year					
Supply Totals	5,520	5,613	5,712	5,817	5,907
Demand Totals	5,520	5,613	5,712	5,817	5,907
Difference	0	0	0	0	0
Third Year					
Supply Totals	5,538	5,633	5,733	5,839	5,907
Demand Totals	5,538	5,633	5,733	5,839	5,907
Difference	0	0	0	0	0
Fourth Year					
Supply Totals	5,557	5,652	5,754	5,862	5,907
Demand Totals	5,557	5,652	5,754	5,862	5,907
Difference	0	0	0	0	0
Fifth Year					
Supply Totals	5,575	5,672	5,775	5,884	5,907
Demand Totals	5,575	5,672	5,775	5,884	5,907
Difference	0	0	0	0	0

NOTES: AFY = acre-feet per year

SOURCE: Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area, Table 5-3, *Five Consecutive Dry Years Water Supply and Demand through 2045 (values in acre-feet)*.

LADWP’s 2020 UWMP provides water supply and demand projections in 5-year increments to 2045 for average year, single dry year, and multiple dry years; refer to **Table 4.18-6, LADWP Service Area Reliability Assessment for Average Weather Year**, **Table 4.18-7, LADWP Service Area Reliability Assessment for Single Dry Year**, and **Table 4.18-8, LADWP Service Area Reliability Assessment for Multiple Dry Years (Year 5 of 5)**. Table 4.18-8, which shows multiple years, is based on historic conditions that occurred between 1988 and 1992, with Year 5 (1992) presenting the worst-case conditions when supplies would be at their lowest. These tables show that LADWP can provide reliable water supplies under all three hydrologic scenarios through the 25-year planning period.

**TABLE 4.18-6
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR AVERAGE WEATHER YEAR**

Demand and Supply Projections (in acre-feet)	Average by Forecast Year – Fiscal Year Ending (FYE) on June 30				
	2025	2030	2035	2040	2045
Total Water Demand^a	642,600	660,200	678,800	697,800	710,500
Post-Conservation Demand	509,500	526,700	536,100	554,500	565,800
Existing/Planned Supplies					
Conservation (Additional Active ^b and Passive ^c after FY 14)	133,100	133,500	142,700	143,300	144,700
Los Angeles Aqueduct ^d	190,400	188,900	187,300	185,800	184,200
Groundwater					
Entitlements ^e	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
<i>Subtotal (Existing/Planned Supplies)</i>	<i>461,200</i>	<i>480,000</i>	<i>495,100</i>	<i>493,700</i>	<i>493,700</i>
MWD Water Purchases (with Existing/Planned Supplies)	181,400	180,200	183,700	204,100	216,800
Total Supplies	642,600	660,200	678,800	697,800	710,500

NOTES:

- ^a Total Demand with existing passive conservation prior to FY 2014.
- ^b Cumulative “hardware” savings since late 1980s reached 110,822 AFY by FYE 2014.
- ^c Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.
- ^d Los Angeles Aqueduct supply is estimated to decrease 0.1652 percent per year due to climate impacts.
- ^e LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: Los Angeles Department of Water and Power, 2021. *2020 Urban Water Management Plan*, Exhibit 11E. May 2021.

**TABLE 4.18-7
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR SINGLE DRY YEAR**

Demand and Supply Projections (in acre-feet)	Average by Forecast Year – Fiscal Year Ending (FYE) on June 30				
	2025	2030	2035	2040	2045
Total Water Demand^a	674,700	693,200	712,700	732,700	746,000
Post-Conservation Demand	509,500	536,700	536,100	554,500	565,800
Existing/Planned Supplies					
Conservation (Additional Active ^b and Passive ^c after FY 14)	165,200	165,500	176,600	178,200	180,200
Los Angeles Aqueduct ^d	70,800	70,200	69,600	69,000	68,500
Groundwater					
Entitlements ^e	121,300	121,300	121,300	120,700	120,700
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
<i>Subtotal (Existing/Planned Supplies)</i>	<i>385,600</i>	<i>406,200</i>	<i>423,200</i>	<i>423,700</i>	<i>425,400</i>
MWD Water Purchases (with Existing/Planned Supplies)	289,100	287,000	289,500	309,000	320,600
Total Supplies	674,700	693,200	712,700	732,700	746,000

NOTES:

- ^a Total Demand with existing passive conservation prior to FY 2014.
- ^b Cumulative “hardware” savings since late 1980s reached 110,822 AFY by FYE 2014.
- ^c Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.
- ^d Los Angeles Aqueduct supply is estimated to decrease 0.1652 percent per year due to climate impacts.
- ^e LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: Los Angeles Department of Water and Power, 2021. 2020 Urban Water Management Plan, exhibit 11F. May 2021.

**TABLE 4.18-8
LADWP SERVICE AREA RELIABILITY ASSESSMENT FOR MULTIPLE DRY YEARS (YEAR 5 OF 5)**

Demand and Supply Projections (in acre-feet)	Multiple Dry Year by Forecast Year: Year 5 (1992) – Fiscal Year Ending on June 30				
	2025	2030	2035	2040	2045
Total Water Demand^a	655,700	673,600	692,600	712,000	724,900
Post-Conservation Demand	507,600	536,600	536,100	554,400	565,700
Existing/Planned Supplies					
Conservation (Additional Active ^b and Passive ^c after FY 14)	148,100	147,000	156,500	157,600	159,200
Los Angeles Aqueduct ^d	141,900	140,700	139,500	138,400	137,300
Groundwater					
Entitlements ^e	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000

Demand and Supply Projections (in acre-feet)	Multiple Dry Year by Forecast Year: Year 5 (1992) – Fiscal Year Ending on June 30				
	2025	2030	2035	2040	2045
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
<i>Subtotal (Existing/Planned Supplies)</i>	<i>427,700</i>	<i>445,300</i>	<i>461,100</i>	<i>460,600</i>	<i>461,300</i>
MWD Water Purchases (with Existing/Planned Supplies)	228,000	228,300	231,500	251,400	263,600
Total Supplies	655,700	673,600	692,600	712,000	724,900

NOTES:

- ^a Total Demand with existing passive conservation prior to FY 2014.
- ^b Cumulative “hardware” savings since late 1980s reached 110,822 AFY by FYE 2014.
- ^c Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.
- ^d Los Angeles Aqueduct supply is estimated to decrease 0.1652 percent per year due to climate impacts.
- ^e LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

SOURCE: Los Angeles Department of Water and Power, 2021. *2020 Urban Water Management Plan*, Exhibit 11G. May 2021.

Sewage and Wastewater

Wastewater Treatment

Sewage in Culver City is transported through a series of gravity mains and lift stations that the City owns and maintains. The wastewater is conveyed through trunk sewers to the Los Angeles Sanitation and Environment’s (LASAN) Hyperion Water Reclamation Plant (HWRP) facility located in Playa Del Rey and Los Angeles County Sanitation District’s (LACSD) Joint Water Pollution Control Plant (JWPCP) located in the city of Carson.

The HWRP is permitted to provide secondary treatment for up to 450 million gallons per day (mgd) average dry weather flow (ADWF), with a current ADWF of 275 mgd. Treatment consists of screening, sand/grit removal, primary treatment, secondary treatment, digestion, and solid handling.⁹

The JWPCP provides both primary and secondary treatment for approximately 260 mgd of wastewater and has a total permitted capacity of 400 mgd.¹⁰ Solids collected in primary treatment and secondary treatment are processed in anaerobic digestion tanks where bacteria break down organic material and produce methane gas. After digestion, the solids are dewatered at Solids Processing and hauled off-site to composting, land application, and landfill disposal locations. Methane gas generated in the anaerobic digestion process is used to produce power and digester heating steam in a Total Energy Facility that utilizes gas turbines and waste-

⁹ Los Angeles Sanitation and Environment, 2023. Treatment Process. https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=pi7xilsd2_5&_afLoop=6341396168899773#!. Accessed April 2023.

¹⁰ Los Angeles County Sanitation District, 2023a. Wastewater Treatment Process at JWPCP. <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant/wastewater-treatment-process-at-jwpcp>. Accessed April 2023.

heat recovery steam generators. The on-site generation of electricity permits the JWPCP to produce most of its electricity.¹¹

Collection Network

Sewage in Culver City generally moves through the gravity mains and lift stations system from northwest to south. The gravity mains are made of various materials including primarily polyvinyl chloride (PVC) and in some cases vitrified clay pipe (VCP). A few gravity mains near Mar Vista and Palms belong to the City of Los Angeles but discharge into the northern side of Culver City.¹² The City-operated Bristol, Fox Hills, Mesmer, and Overland pump stations were replaced in 2020 by the Bankfield Pump station, located at 5722 Bankfield, which pumps 1.3 mgd.¹³

Recycled Water Systems

No recycled water systems currently connect to Culver City. However, future supply needs and regional cooperation may make it possible to explore implementing recycled water networks.

Stormwater

Hydrology

Culver City's water use affects various watersheds and water bodies in the region. The Planning Area is located predominantly within the Ballona Creek Watershed with a few parcels on the western side of the Planning Area located within the Marina Del Rey Watershed, as shown in Figure 4.9-1, *Existing Hydrologic Setting*, in Section 4.9, *Hydrology and Water Quality*. The Ballona Creek Watershed is located on the coastal plain of the Los Angeles Basin and includes a portion of the Santa Monica Mountains to the north and the Baldwin Hills to the south.¹⁴ The Ballona Creek Watershed is approximately 128 square miles and extends across the cities of Culver City, Beverly Hills, and West Hollywood, and portions of the cities of Los Angeles, Inglewood, Santa Monica, and unincorporated areas of the County of Los Angeles. A majority of the Planning Area's land area drains into the Ballona watershed.¹⁵ The remaining area drains into the small, 2.9-square mile Marina del Rey Watershed, which surrounds the Marina del Rey harbor. Ballona Creek's stormwater flows westward through an engineered channel, discharging into the Santa Monica Bay through the Oxford Basin, a 10.7-acre human-made flood control

¹¹ Ibid.

¹² Culver City, 2023a. Sewer Infrastructure Management System (SIMS). <https://gisproxy.culvercity.org/Html5Viewer/index.html?viewer=Sims.sims>. Accessed April 2023.

¹³ Culver City, 2022. Capital Improvement Plan FY 2022/2023 to FY 2026/2027, pg. 59. https://www.culvercity.org/files/assets/public/documents/finance/governmenttransparency/02_annualcitybudgets/3_cip/cip_2022-2023.pdf. Accessed July 2023.

¹⁴ Ballona Creek Watershed Management Group, 2016. Enhanced Watershed Management Program for the Ballona Creek Watershed. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/ballona_creek/BallonaCreek_RevisedEWMP_corrected2016Feb1.pdf. Accessed April 2023.

¹⁵ Ibid.

retention facility, located in the harbor, that the Los Angeles County Flood Control District owns and operates.^{16,17}

Drainage Collection

Stormwater is collected and conveyed through storm drains owned and maintained by Culver City and Los Angeles County. These lines generally drain towards the southwest or northeast, depending on their location within the Planning Area, before discharging into larger conveyance pipes that drain into Ballona Creek. Major outfall pipes for the Planning Area's stormwater system vary in size from 18 to 87 inches in diameter and are found along the east and west sides of Ballona Creek. There are also outfall pipes along National Boulevard, Higuera Street, Duquesne Avenue, Madison Avenue, La Bouget Avenue, Sepulveda Boulevard, Saint Nicholas Avenue, Overland Avenue, and off the Baldwin Hills Scenic Overlook.

Culver City and Los Angeles County also have a network of catch basins that trap debris before entering the storm drain system. These catch basins help the storm drain system work effectively and more efficiently.

Solid Waste Disposal

Solid waste management in Culver City involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities.

Pursuant to Section 5.01.01 of the City's Municipal Code, solid waste handling and recyclable waste material handling shall be performed exclusively by the City or its authorized agents. In accordance with this section, all trash collection in the city is managed by the City's Public Works Department (PWD), Environmental Programs and Operations Division (EPO), with all residential, commercial and industrial solid waste in the city collected by the EPO or its authorized agents. The EPO also provides a curbside recycling program for paper, cardboard, cans/aluminum, plastic, and glass, with recyclable and green waste hauled to private recycling facilities.¹⁸

Culver City does not own or operate any landfills. The majority of solid waste generated in the city is disposed of at County landfills. Per the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, while the economy has continued to grow in recent years, the amount of waste that residents and businesses generated and disposed of in the county remained relatively low.¹⁹ The CoIWMP 2020 Annual Report shows a downward disposal trend from 2009 to 2011 with a plateau between 2011 through 2014, an increase from 2014 to 2018 and another slight plateau from 2018 to the present. In 2020, the most recent year for which reported data is available, the county disposed of approximately 11

¹⁶ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

¹⁷ Marina del Rey Enhanced Watershed Management Program Agencies, 2016. Marina del Rey Enhanced Watershed Management Program Plan. https://file.lacounty.gov/SDSInter/dbh/docs/1025171_MdR_EWMP_Final.pdf. Accessed April 2023.

¹⁸ Culver City, 2023b. Trash & Recycling. <https://www.culvercity.org/Services/Trash-Recycling>. Accessed April 2023.

¹⁹ County of Los Angeles Department of Public Works, 2021. CoIWMP 2020 Annual Report, p. 5. October 2021.

million tons of materials. The CoIWMP assumes an ongoing diversion rate of 65 percent Countywide. The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and State Assembly Bill (AB) 341, which has a 75 percent recycling goal. The 2020 average daily disposal for in-county landfills was 19,291 tons per day (tpd) and the maximum daily capacity was 45,297 tpd.²⁰

The CoIWMP 2020 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2035 with assumptions that include meeting the California Department of Resources Recycling and Recovery (CalRecycle) statewide disposal target, meeting SB 1383 organic waste disposal reduction targets, and all solid waste management options considered become available. Therefore, a shortfall in disposal capacity is not expected to occur during this scenario during the 15-year planning period.

Landfills

Class III landfills accept non-hazardous municipal solid waste. There are 10 Class III landfills in the county, which collectively accept the majority of solid waste generated in the county (approximately 6,018,869 tons in 2020), followed by exports to out-of-county landfills in Orange, Riverside, San Bernardino, Ventura, and Kern counties (4,544,808 tons in 2020) and transformation facilities (337,989 tons in 2020). The remaining disposal capacity for the County's Class III landfills is estimated at approximately 142.67 million tons as of December 31, 2020.

Of the 10 County Class III landfills serving the city, Sunshine Canyon landfill is the largest recipient of non-hazardous solid waste disposal materials. The maximum daily capacity for the landfill is approximately 12,100 tpd, and the 2020 average daily disposal was approximately 7,907 tpd. Based on Appendix E-2, Table 4 of the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP), as of December 31, 2020, Sunshine Canyon landfill had a remaining capacity of approximately 54.08 million tons and a remaining life expectancy of approximately 17 years.

Unclassified landfills accept construction and demolition (C&D) waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2020, the amount of inert waste materials disposed countywide was 321,830 tons.

As of 2020, there is only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit, which is the Azusa Land Reclamation Landfill. The remaining capacity of this landfill is estimated at 51.71 million cubic yards (64.64 million tons) with a projected closure date of 2045.

²⁰ County of Los Angeles Department of Public Works, 2021. CoIWMP 2020 Annual Report, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County. October 2021.

In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under state permit provisions that provide additional capacity in the county, collectively processing approximately 3.35 million tons in 2019.²¹

Waste Diversion and Recycling

Under AB 341, all cities and counties in the state had a goal to divert 75 percent of their solid waste streams from landfills by 2020.²² The County and multiple cities in the County, including Culer City, have a diversion rate at 65 percent according to the CoIWMP 2020 Annual Report, the latest report available.

Culver City achieved a 70 percent diversion rate in 2015 as a result of a combination of measures required in the City's Source Reduction and Recycling Element (SRRE). For purposes of compliance with SB 1016, CalRecycle compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day with a target specified for each city, county, or regional agency with a CalRecycle-approved planning document. The specific targets for the Culver City are 8.9 pounds/resident/day and 8.3 pounds/employee/day.²³ In 2021, Culver City achieved a per capita disposal of 6.5 pounds/resident/day and 4.9 pounds/employee/day.²⁴

Electricity

Culver City is a member of the Clean Power Alliance (CPA), which provides clean, renewable energy. CPA is a nonprofit entity, formed in 2019 through a Joint Powers Authority²⁵ and is made up of 32 public agencies across Los Angeles and Ventura counties. CPA purchases clean power and supplies 100 percent renewable electricity to Culver City as the community's default-selected tier option. Lower renewable percentage rate options (36 percent and 50 percent renewable) are available to consumers through two additional tiers offered at a reduced cost.

Southern California Edison (SCE) distributes electric power from the CPA to Culver City and LADWP produces, purchases, conveys, and delivers electric power to other parts of Culver City. LADWP's main Receiving Station²⁶ D, that brings high voltage power into the city and steps it down to local distribution levels, is located directly north of the city. Since 2017, renewable energy sources have supplied 30 percent of LADWP's power throughout its service area. LADWP is working aggressively to expand Los Angeles' supply of renewable resources, which impacts Culver City.

²¹ County of Los Angeles Department of Public Works, 2021. CoIWMP 2020 Annual Report, p. 33. October 2021.

²² California Public Resources Code, Section 41730 et seq.

²³ California Department of Resources Recycling and Recovery, 2021a. Countywide, Regionwide, and Statewide Jurisdiction Diversion/Disposal Progress Report, for reporting year 2021. <https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/slcp/capacityplanning/recycling/DiversionDisposal>. Accessed April 2023.

²⁴ California Department of Resources Recycling and Recovery, 2021b. Jurisdiction Per Capita Disposal Trends – Culver City, for reporting year 2021. <https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports>. Accessed April 2023.

²⁵ A joint powers authority is when two or more public authorities (e.g., local agencies, or utility or transport districts), not necessarily located in the same state, jointly exercise any power common to all parties.

²⁶ A receiving station is one type of high voltage substations used by LADWP that serves as a bridge between power plants and local distribution: <https://clui.org/projects/ladwp-power/high-voltage-control-facilities>.

Electric Distribution Network

The Santa Monica District of SCE delivers electric power to Culver City through a series of 29 distribution circuits connecting the Planning Area and has been working to improve its network resiliency to disruptions. Between 2017 and 2018, Culver City's sustained unexpected interruptions to electricity services decreased from an average of 121.7 minutes to 36.6 minutes. In comparison, the entire SCE systemwide network sustained 136.8 minutes of interruptions in 2018 and 139.7 minutes of interruptions in 2017, not including interruptions caused by acts of nature. Causes of repair outages in Culver City in 2018 were attributed largely to equipment failure (48.5 percent), urgent maintenance operations (33.7 percent), and weather/fire/earthquake (9.7 percent).²⁷

At the California Public Utilities Commission's (CPUC) request, SCE prepared a Wildfire Mitigation Plan that showed that six of the City's 29 circuits are within wildfire-prone areas. The Plan includes a Public Safety Power Shutoff program that monitors weather conditions and, when necessary, shuts the power off within one or more of the City's six circuits to reduce the likelihood of wildfire caused by their power lines.

Natural Gas

The Southern California Gas Company (SoCalGas) conveys and delivers natural gas services to residential and public services in Culver City using a combination of storage and pipeline facilities. This network has been instrumental in helping the City integrate compressed natural gas (CNG) vehicles into its municipal fleet, which began in 1996. By 2004, the Culver CityBus network transitioned to 100 percent CNG, which was ranked the second-best green fleet in North America in 2008.

The City's fleet of over 350 vehicles and equipment includes 41 CNG powered vehicles including refuse trucks, heavy duty public works trucks, park vehicles, and various staff cars.²⁸ Currently, the City is working towards converting this CNG fleet into an all-electric fleet. In 2016, the City approved an agreement with Clean Energy Renewable for consulting and managing services of renewable natural gas as part of the City's participation in the Low Carbon Fuel Standard (LCFS) program under AB 32 to support greening the City's transportation facilities.

Natural Gas Distribution Network

Natural gas distribution service networks cover the majority of Culver City and are fed largely by the natural gas storage facility located in Playa del Rey. A portion of the Inglewood Oil Field (IOF), which actively produces both oil and natural gas, is located within the Planning Area. Regionally connected transmission and high-pressure distribution lines intersect the Planning Area, which connect to the locally distributed pipeline network. However, as discussed in Section 4.11, *Mineral Resources*, the City adopted an Oil Termination Ordinance to implement an amortization program that would terminate and phase out nonconforming oil and gas

²⁷ Southern California Edison, 2019. Circuit reliability Review, Culver City, 2019. <https://www1.sce.com/nrc/reliability/reports/CulverCity.pdf>.

²⁸ Southern California Gas Company, 2014. Natural Gas Vehicles: Customer Case Study. <https://www.socalgas.com/documents/innovation/natural-gas-vehicles/NGV-CulverCity-CNG-Bus.pdf>. Accessed April 2023.

activities within the city portion of the IOF by November 24, 2026. Similar to the City, the County adopted an Oil Well Ordinance for unincorporated areas of the County that prohibits new oil wells and production facilities in all zones, designates existing oil wells and production facilities as nonconforming uses in all zones, and establishes regulations for existing oil wells and production facilities. See Section 4.11 for a more detailed discussion.

Telecommunications

Communication systems located throughout the Planning Area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers.

Landline telephone service in the Planning Area is provided by various commercial communications companies. The majority of the landline facilities are located in County or City-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles and underground.

In addition to landline service, a large number of communications towers have been constructed throughout the Planning Area for cellular telephone service. Cellular towers have been erected along major travel corridors to meet emergency service objectives. Cellular service is available, to varying degrees, throughout the Planning Area.

4.18.3 Regulatory Framework

This section provides the relevant federal, state, regional, and local regulations applicable to the Project relevant to the various utilities evaluated in this section.

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), administered by the United States Environmental Protection Agency (USEPA) in coordination with the states, is the main federal law that ensures the quality of drinking water. Under the SDWA, USEPA sets standards for drinking water quality and oversees the states localities, and water suppliers who implement those standards. The California Department of Public Health administers the regulations contained in the SDWA in the State of California.

Federal Water Pollution Control Act of 1972 – Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the “waters of the United States.” The Act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff.

Section 303(d) of the CWA requires states, territories, and authorized tribes to develop a list of water quality limited segments of rivers and other water bodies under their jurisdiction. These waters on the list do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires

that these jurisdictions establish priority rankings for waters on the list and develop action plans, called Total Maximum Daily Loads (TMDL), to improve water quality. These are action plans designed to improve the quality of water resources. As part of the TMDL process, municipalities must examine the water quality problems and identify sources of pollutants in order to create specific actions designed to improve water quality.

Section 402 of the CWA regulates point-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the program which is administered by Regional Water Quality Control Boards (RWQCBs). The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

The NPDES program covers municipalities, industrial activities, and construction activities. The NPDES program includes an industrial stormwater permitting component that covers ten categories of industrial activity that require authorization under a NPDES industrial stormwater permit for stormwater discharges. Construction activities, also administered by the SWRCB, are discussed later in this section. Section 402(p) of the CWA, as amended by the Water Quality Act of 1987, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s), stormwater discharges associated with industrial activity, and designated stormwater discharges, which are considered significant contributors of pollutants to waters of the United States.

On November 16, 1990, the USEPA published regulations (40 CFR Part 122), which prescribe permit application requirements for MS4s pursuant to CWA 402(p). On May 17, 1996, the USEPA published an Interpretive Policy Memorandum on Reapplication Requirements for MS4s, which provided guidance on permit application requirements for regulated MS4s. MS4 permits include requirements for post-construction control of stormwater runoff in what is known as Provision C.3. The goal of Provision C.3 is for the Permittees to use their planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address both soluble and insoluble storm water runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects. This goal is to be accomplished primarily through the implementation of low impact development (LID) techniques.

Section 404 establishes a permit program, administered by United States Army Corps of Engineers (USACE), to regulate the discharge of dredge or fill materials into waters of the United States, including wetlands. Activities in waters of the United States that are regulated under this program include fills for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and conversion of wetlands to uplands for farming and forestry. CWA Section 404 permits are issued by USACE.

National Pollutant Discharge Elimination System

The CWA was amended in 1987 to include urban and stormwater runoff, which required many cities to obtain an NPDES permit for stormwater conveyance system discharges. Section 402(p)

of the Clean Water Act prohibits discharges of pollutants contained in storm water runoff, except in compliance with a NPDES permit.

United States Department of Energy (Energy Policy Act of 2005)

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state-level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

Federal Communications Commission

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

State

California Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the SWRCB and divided the state into nine regional basins, each with a RWQCB. SWRCB is the primary state agency responsible for protecting the quality of the state's surface and groundwater supplies, while the regional boards are responsible for developing and enforcing water quality objectives and implementation plans. The Planning Area is located within the jurisdiction of Los Angeles RWQCB.

The Act authorizes SWRCB to enact state policies regarding water quality in accordance with CWA Section 303. In addition, the act authorizes SWRCB to issue Waste Discharge Requirements (WDRs) for projects that would discharge into state waters. The Porter-Cologne Water Quality

Control Act requires that SWRCB or Los Angeles RWQCB adopt water quality control plans (basin plans) for the protection of water quality. A basin plan must:

- Identify beneficial uses of waters to be protected;
- Establish water quality objectives for the reasonable protection of the beneficial uses; and
- Establish a program of implementation of achieving the water quality objectives.

Basin plans also provide the technical basis for determining waste discharge requirements, taking enforcement actions, and evaluating clean water grant proposals. Basin plans are updated and reviewed every three years in accordance with Article 3 of the Porter-Cologne Water Quality Control Act and Section 303(c) of the CWA.

State Updated Model Landscape Ordinance

The state's Updated Model Landscape Ordinance (AB 1881) required cities and counties to adopt landscape water conservation ordinances by January 31, 2010. In 2015, Executive Order B-29-15 tasked the California DWR with revising the 2010 Model Water Efficient Landscaping Ordinance to increase water efficiency standards for new and retrofitted landscapes. Increased water efficiency can be achieved through efficient irrigation systems, graywater usage, and on-site stormwater capture, and by limiting the portion of landscapes that can be covered in turf. Projects in the city that are subject to the Model Water Efficient Landscaping Ordinance requirements must submit a landscape design plan as part of the submittal process with the City.²⁹

California Urban Water Management Planning Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water to customers.

California Emergency Graywater Regulations

In 2009, as part of the Governor's declared State of Emergency, Chapter 16A "Non-potable Water Reuse Systems" was incorporated into the 2007 California Plumbing Code. Chapter 16A establishes minimum requirements for the installation of graywater systems in residential occupancies regulated by the California Department of Housing and Community Development, providing guidance and flexibility designed to encourage the use of graywater. The standards allow small graywater systems to be installed in homes without a construction permit, substantially reducing the barriers to installing small residential graywater systems in California. The purpose of the regulations is to conserve water by facilitating greater reuse of laundry, shower, sink, and similar sources of discharge for irrigation and/or indoor use; to reduce the

²⁹ Culver City Municipal Code, Section 5.08.045.

number of noncompliant graywater systems by making legal compliance easily achievable; to provide guidance for avoiding potentially unhealthful conditions; and to provide an alternative way to relieve stress on private sewage disposal systems.

Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, SB 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects.

SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

The WSA must be approved by the public water supplier serving the project and incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be

included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "... any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.³⁰ As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.³¹ Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.³² Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.³³

³⁰ California State Water Resources Control Board, 2010. 20 x 2020 Water Conservation Plan, February 2010.

³¹ State Water Resources Control Board, 2017a. Fact Sheet, February 2017 Statewide Conservation Data, February Conservation Summary, updated April 4, 2017.

³² State Water Resources Control Board, 2017b. Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.

³³ State Water Resources Control Board, 2017c. Fact Sheet, August 2017 Statewide Conservation Data, August Urban Water Production Summary, updated October 3, 2017.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) of 2014,³⁴ passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.³⁵ The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017.

The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, the SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

California Code of Regulations

Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable state efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi); and lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.³⁶

CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory

³⁴ Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2019.

³⁵ California Department of Water Resources, 2023. SGMA Groundwater Management. <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>. Accessed April 2023.

³⁶ California Code of Regulations, Title 20, Section 1605.3(h).

measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed in the previous section. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2020.

Executive Order B-37-16

In 2018 the California State Legislature enacted two policy bills: SB 606 and AB 1168 to establish a new foundation for long-term improvements in water conservation goals and drought planning to adapt to the longer and more intense droughts climate change is causing in California.

Collectively, these efforts provide a road map for all Californians to work together to ensure there is sufficient water now and in the future. The 2018 legislation applies to the actions of DWR, SWRCB, and water suppliers. DWR and SWRCB will work closely together to develop new standards for:

- Indoor residential water use standard will be 55 gallons per capita daily until January 2025; the standard will become stronger over time, decreasing to 50 gallons per capita daily in January 2030. For the water use objective, the indoor use is aggregated across population in an urban water supplier's service area, not each household;
- Outdoor residential water use standard will be based on land cover [landscaping], climate, and other factors, i.e., geography, pastures and other irrigated lands, or open space determined by the DWR and the SWRCB. The SWRCB will adopt the outdoor standard by June 2022;
- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters; and
- System water losses, formerly known as unaccounted for water.

Urban water suppliers must stay within annual water budgets based on these standards for their service areas. The 2018 legislation also supports drought planning. In urban areas, drought plans will be primarily led by local water suppliers. DWR and SWRCB will develop recommendations to strengthen drought planning in rural areas and areas served by small water systems by coordinating with counties and other stakeholders.

Executive Order B-40-17

Executive Order B-40-17 was issued on April 7, 2017. Cities and water districts throughout the state are required to report their water use each month and ban wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. The Order lists common sense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the state’s progress.

Executive Order 7-77

On March 28, 2022, Governor Newsom issued Executive Order No. 7-77, meant to provide guidance on emergency drought relief. The Order states that the “21st century to date has been characterized by record warmth and predominantly dry conditions, and the 2021 meteorological summer in California and the rest of the western United States was the hottest on record” and “the ongoing drought will have significant, immediate impacts on communities with vulnerable water supplies, farms that rely on irrigation to grow food and fiber, and fish and wildlife that rely on stream flows and cool water.”

Within the Order, the Governor directed SWRCB to evaluate the adoption of regulations and the relaxations of permitting for drought positive measures. These regulations include banning irrigation of “non-functional” turf (or grass), such as decorative grass adjacent to large industrial and commercial buildings. The ban would not include residential lawns or grass used for recreation, such as school fields, sports fields and parks. Further, the Order asks SWRCB to prepare municipal water agencies for drought restrictive measures. More specifically, SWRCB asks these urban water suppliers to prepare to activate, at a minimum, Level 2 of their customized Water Shortage Contingency Plans. These plans are developed by local water agencies to navigate extreme drought and each plan is customized based on an agency’s unique infrastructure and management. Triggering Level 2 of these plans involves implementing water conservation actions to prepare for a water shortage level of up to 20 percent.

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (AB 939), as amended, was enacted to reduce, recycle, and reuse solid waste generated in the state. AB 939 requires city and county jurisdictions to divert 50 percent of the total waste stream from landfill disposal. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element to describe how it would reach these goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of AB 939, including the previously noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to CalRecycle to update their progress toward the AB 939 goals.³⁷ CalRecycle is a department within the California Environmental Protection Agency (CalEPA) that administers and provides

³⁷ California Public Resources Code Section 41821.

oversight for all of California’s State-managed non-hazardous waste handling and recycling programs.

California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in PRC Sections 42900–42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of the required storage areas is to be determined by the appropriate jurisdiction’s ordinance.

Construction and Demolition Waste Materials Diversion Requirements

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (SB 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004.³⁸

Organic Recycling

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines “organic waste” as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a “business” as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate four cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate four cubic yards or more of commercial solid waste per week also were required to arrange for organic waste recycling services. In October 2021, CalRecycle reduced this threshold to two cubic yards of solid waste (i.e., total of trash, recycling, and organics) per week generated by covered businesses.³⁹

Zero Waste California

Zero Waste California is a state program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be

³⁸ California Department of Resources Recycling and Recovery, 2023a. Senate Bill 1374 (2002). <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>. Accessed April 2023.

³⁹ California Department of Resources Recycling and Recovery, 2023b. Mandatory Commercial Organics Recycling. www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed March 2023.

repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

California’s 75-Percent “Recycling” Goal

AB 341, signed on February 10, 2011, directed that no less than 75 percent of solid waste generated in California be source reduced,⁴⁰ recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 also mandated local jurisdictions to implement commercial recycling by July 1, 2012.

Disposal Measurement System Act of 2008

SB 1016 maintains the 50 percent diversion rate requirement established by AB 939, while establishing revised calculations for those entities who did not meet the 50 percent diversion rate. SB 1016 also established a per capita disposal measurement system to make the process of goal measurement, as established by AB 939, simpler, timelier, and more accurate. The new disposal-based indicator—the per capita disposal rate—uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal as reported by disposal facilities.

Organic Waste Reduction

Effective September 2016, SB 1383 established two organic waste disposal reduction targets tied to the 2014 baseline of 23 million tons of organic waste disposal that must be achieved by 2020 and 2025. The target is set for 2020 at 50 percent organic waste reduction from 2014 baseline (11.5 million tons allowed landfill disposal of organic waste), and for 2025 at 75 percent organic waste reduction from 2014 baseline (5.75 million tons allowed landfill disposal of organic waste). The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Independent System Operator

The California Independent System Operator (ISO) is an independent public benefit corporation responsible for operating California’s long-distance electric transmission lines. California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

⁴⁰ Source reduction refers to activities designed to reduce the volume, mass, or toxicity of products throughout their life cycle. It includes the design and manufacture, use, and disposal of products with minimum toxic content, minimum volume of material, and/or a longer useful life.

California Public Utilities Commission

CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as SCE and SoCalGas. Public owned utilities such as LADWP do not fall under CPUC's jurisdiction.

CPUC is overseen by five commissioners appointed by the Governor and confirmed by the State senate. CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines, and permitting of electrical transmission and substation facilities.

California Energy Commission

The California Energy Commission (CEC) is a planning agency which provides guidance on setting the state's energy policy. CEC's responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. CEC also has specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

Senate Bill 1389

SB 1389 (Public Resources Code [PRC] Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The 2021 Integrated Energy Policy Report, the latest report published by CEC, provides the results of CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.⁴¹

Title 24, California Code of Regulations, Part 6: Energy Efficiency Standards for Buildings

Title 24, Part 6, of the California Code of Regulations contains the CEC's Energy Efficiency Standards for Residential and Nonresidential Buildings. Title 24 was first established in 1978, in response to a legislative mandate to reduce California's energy consumption. Since that time, Title 24 has been updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

Assembly Bill 1890

CPUC regulates investor-owned electric power and natural gas utility companies in the State of California. AB 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities (e.g., SCE) was decoupled. All new construction in the State of California is subject to the energy conservation standards set forth in Title 24, Part 6, Article 2 of the California Administrative Code. These are

⁴¹ California Energy Commission, 2022. 2021 Integrated Energy Policy Report, February 22, 2022.

prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. The utilization of alternative energy applications in development projects, while encouraged, is not required as a development condition. Such applications may include installation of photovoltaic solar panels, active solar water heating systems, or integrated pool deck water heating systems, all of which serve to displace consumption of conventional energy sources (i.e., electricity and natural gas). Incentives, primarily in the form of state and federal tax credits, as well as reduced energy bills, provide a favorable basis.

Regional

Metropolitan Water District 2020 Urban Water Management Plan

As discussed in detail above, Metropolitan is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, Metropolitan has adopted a series of official reports on the state of its water supplies. In response to recent developments in the Sacramento Delta, Metropolitan has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including Culver City and the City of Los Angeles.

Metropolitan's 2020 UWMP (MWD UWMP) addresses the future of Metropolitan's water supplies and demand through the year 2045.⁴² Evaluations are prepared for average year conditions, single dry year conditions, and multiple dry year conditions. The analysis for multiple dry year conditions, i.e., under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 UWMP.⁴³ The analysis in the 2020 UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.⁴⁴ In the 2020 UWMP, the projected 2045 demand water during multiple dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.⁴⁵

Metropolitan has comprehensive plans for stages of actions it would undertake to address up to a 50 percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. Metropolitan has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. Metropolitan is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and

⁴² Metropolitan Water District of Southern California, 2021. 2020 Urban Water Management Plan, June 2021.

⁴³ Metropolitan Water District of Southern California, 2021. 2020 Urban Water Management Plan, June 2021, p. 2-19.

⁴⁴ Metropolitan Water District of Southern California, 2021. 2020 Urban Water Management Plan, June 2021, p. 2-19.

⁴⁵ Metropolitan Water District of Southern California, 2021. 2020 Urban Water Management Plan, June 2021, p. 2-19.

disruption of SWP deliveries. In addition, Metropolitan has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

2015 Integrated Resources Plan

Metropolitan prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.⁴⁶ It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply, and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, Metropolitan would make investments to maximize Colorado River Aqueduct deliveries in dry years. Metropolitan would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.⁴⁷

Metropolitan published annual implementation reports on its progress towards the 2015 IRP goals. The most recent Implementation Report (2019)⁴⁸ highlights the progress on achieving the above resource and reliability goals established in the 2015 IRP as follows:

- Metropolitan has worked closely with other agencies to improve reliability of its imported water supplies. Metropolitan led efforts in crafting the Lower Colorado River Basin Drought

⁴⁶ Metropolitan Water District of Southern California, 2016. Integrated Water Resources Plan – 2015 Update, Report No. 1518.

⁴⁷ Metropolitan Water District of Southern California, 2016. Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016, p. VIII.

⁴⁸ The complete 2019 Implementation Report can be found on MWD's website at https://www.mwdh2o.com/media/18038/10072019_wps_7c-irp_report.pdf.

Contingency Plan and supported efforts to make the Delta more resilient and support Governor Newsom’s new direction to advance a single tunnel solution in the Delta.

- Metropolitan continues to support and encourage local supply development through the Local Resources Program. Metropolitan’s board approved three projects with a total contract yield of 3,660 acre-feet per year from January 2019 to date. Seven additional applications for a total of 116,580 acre-feet per year are under consideration. Metropolitan is also assessing the water supply benefits from stormwater through pilot programs.
- Metropolitan continues to inform residents of water use efficiency through its ongoing advertising campaigns and education. In addition to rebates for water efficient fixtures, Metropolitan also implements programs targeting outdoor conservation with its landscape education and turf replacement programs. In 2019, Metropolitan’s board approved a conservation initiative that focuses on reaching disadvantaged communities.

As of April 2023, the 2020 IRP planning process is in development.

The 2020 IRP is a two-phase process including a Regional Needs Assessment (Phase 1) and a One Water Implementation phase (Phase 2). The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges.

The Draft Regional Needs Assessment was recently completed and includes the analysis of regional needs under a range of scenarios: (1) Scenario A, low demand and stable imports, (2) Scenario B, high demand and stable imports, (3) Scenario C, low demand and reduced imports, and (4) Scenario D, high demand and reduced imports (Metropolitan, 2022). The Draft Regional Needs Assessment found plausible reliability outcomes by the year 2045, with potential shortages ranging from no net shortage at all under Scenario A to as high as 1.2 million acre-feet under Scenario D, and identifies needs and opportunities related to five focus areas: (1) SWP dependent areas, (2) storage, (3) retail demand/ demand management, Metropolitan imported supplies, and (5) local supply. The Draft Regional Needs Assessment concludes that “Collectively, these findings instill a sense of optimism about Southern California’s water future. Metropolitan has identified the tools necessary to adapt to a variety of plausible futures successfully. It is also well within Southern California’s control to avoid a fate with increased per-capita water use and higher demands that would prove unsustainable.” It further notes that through the One Water Phase of the process, “the precise combination of actions will emerge as more is known about the future that we actually face. Southern California is poised to be agile enough to adjust its portfolio of water actions to keep up with our changing times.”

Water Surplus and Drought Management Plan

In 1999, Metropolitan incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of Metropolitan’s imported water supplies is not required. The WSDM Plan provides policy guidance to manage Metropolitan’s supplies and achieve the goals laid out in the

agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after Metropolitan has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.⁴⁹

Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for Metropolitan staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, Metropolitan adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in Metropolitan's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on Metropolitan stay in balance with limited supplies. The WSAP formula addresses shortages of Metropolitan supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 consecutive months from July of a given year through the following June.

West Basin Municipal Water District 2020 Urban Water Management Plan

WBMWD was established in 1947 to mitigate over-pumping in the West Coast Subbasin. WBMWD is the fourth-largest member agency of Metropolitan and undertakes actions to protect groundwater supplies from seawater intrusion and augment the West Coast Subbasin supplies. WBMWD imports water from Metropolitan and delivers these supplies to investor-owned utilities, municipalities, a county waterworks district, and a groundwater agency to supplement locally available supplies.

⁴⁹ Metropolitan Water District of Southern California, 1999. Water Surplus and Drought Management Plan, Report No. 1150.

As described in its most recent 2020 UWMP, WBMWD has an approximately 185-square-mile service area and provides wholesale potable water to 17 cities through three investor-owned utilities, four municipal water departments and one county waterworks district, in southwest Los Angeles County. WBMWD supplies recycled water to over 450 metered connections for municipal, commercial, and industrial use as well as for injection into the West Coast Basin Seawater Barrier to halt seawater intrusion and replenish the WCGB aquifers.⁵⁰

WBMWD has been able to support the diversification of supplies available to its customer agencies by providing access to imported water supplies from MWD, as well as primarily through the development of recycled water supplies and conservation. These supplies are served directly to its customer agencies and indirectly as the replenishment supplies necessary to maintain groundwater production. WBMWD is projected to increase current recycled water supplies as well as invest in ocean water desalination supply.

County of Los Angeles Countywide Integrated Waste Management Plan

Pursuant to AB 939, each County is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element. The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the Countywide Siting Element.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the ColWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the ColWMP 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the ColWMP's horizon year of 2035. As stated within the ColWMP 2020 Annual Report, the County is anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions. However, under other scenarios, including meeting CalRecycle's statewide disposal target, meeting Senate Bill 1383 organic waste disposal reduction targets, and all solid waste management options considered become available, a shortfall in disposal capacity is not expected to occur during this scenario during the 15-year planning period.

SCE Wildfire Mitigation Plan

SCE's Wildfire Mitigation Plan (WMP) is a comprehensive blueprint to address wildfire risk and Public Safety Power Shutoff (PSPS) impacts in SCE's service area and was developed with the input of SCE regulators, public safety partners, local governments, community groups, fellow electrical corporations, and other stakeholders. The 2023-2025 WMP builds upon SCE's 2020-

⁵⁰ West Basin Municipal Water District, 2021. Urban Water Management Plan, pg. ES-3.
https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F1728223502%2FWBMWD%202020%20UWMP_Final_2021-06-30.pdf. Accessed April 2023.

2022 WMP to maintain the risk reduction achieved to date and is intended to further reduce the significant wildfire risk and PSPS impacts that remain.⁵¹

Local

Culver City Service Area Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. GSWC approved the Culver City Service Area 2020 UWMP on June 15, 2021. The 2020 UWMP describes GSWC's water supply reliability under single dry year, multiple dry year, and average year conditions, with projected information in five-year increments for a minimum of 20 years.

It is also acknowledged that GSWC service areas are in Stage 2 of the Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing plan.⁵² In Stage 2, customers are encouraged to voluntarily reduce usage by 20 percent (compared to 2020) and limit outdoor irrigation/watering to no more than two days per week between the hours of 5 p.m. and 9 a.m. Addresses ending in an even number must water only on: Sunday or Wednesday. Addresses ending in an odd number must water only on: Tuesday or Saturday.

Culver City Water Conservation Plan

The City's Water Conservation Plan was developed to achieve targeted water reductions in City facilities, provide information and encouragement to residents seeking to reduce water consumption, and enable residents to adhere to mandatory water use restrictions.⁵³ The Plan includes mandatory water use restrictions for businesses and residents, water saving measures for residents, and water saving measures for City facilities.

Culver City Municipal Code

Water

The City's policies regarding water supply are set forth in Chapter 5.03, *Water Conservation and Water Supply Shortage Program*, of the City's Municipal Code. The purpose of this chapter is to adopt and enforce a conservation and supply shortage program as necessary to manage the City's potable water supply in the short- and long-term, and to avoid or minimize the effects of drought and shortage within the city. According to Chapter 5.03.C, careful water management that includes active water conservation measures not only in times of drought, but at all times, is essential to ensure a reliable minimum supply of water to meet current and future water supply needs.⁵⁴

⁵¹ Southern California Edison, 2023. 2023–2025 Wildfire Mitigation Plan. <https://www.sce.com/safety/wild-fire-mitigation>. Accessed March 2023.

⁵² Culver City, 2023c. Water Conservation. <https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Water-Conservation>. Accessed April 2023.

⁵³ Culver City, 2015. Water Conservation Plan for Fiscal Year 2015/2016, 2015. <https://www.culvercity.org/files/assets/public/documents/building-development/city-documents/culvercitywaterconservatio.pdf>. Accessed April 2023.

⁵⁴ Culver City Municipal Code, Chapter 5.03.

The water conservation and supply shortage program established under Chapter 5.03, is intended to reduce water consumption through conservation, and to enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water within the City to avoid and minimize the effect and hardship of water shortage to the greatest extent possible.

Under Section 5.03.030, permanent water conservation requirements and prohibition against waste include limits on watering hours (Section 5.03.030.A), which prohibit watering or irrigating of lawn, landscape or other vegetated area with potable water between the hours of 8:00 a.m. and 7:00 p.m.; limit on watering duration (Section 5.03.030.B), which limit watering to no more than 10 minutes of watering per day, per station; prevention of excessive water flow or runoff (Section 5.03.030.C); and prohibition of washing down hard or paved surfaces (Section 5.03.030.D). Other measures (Section 5.03.030.E through O) include the obligation to fix leaks, breaks or malfunctions (Section 5.03.030.E); required re-circulation of water for decorative water fountains and decorative water features (Section 5.03.030.F), and prohibition of single-pass cooling systems (Section 5.03.030.J). The Code also requires that all pools and spas must be covered in a manner to reduce evaporation (Section 5.03.030.N) and prohibit irrigation of ornamental turf on public street medians (Section 5.03.030.O).

Sections 5.03.035, 5.03.040, and 5.03.045, respectively, pertain to Level 1, Level 2, and Level 3 water supply shortage emergency conditions. The stages are cumulative and include permanent measures as well as measures from the preceding level. Level 1 water supply shortage requires additional water conservation measures including limits on watering days; a 72-hour time limit on repairs of leak, breaks or malfunctions. Level 2 requires more stringent limits on watering days, a 48-hour time limit on repairs of leak, breaks or malfunction; prohibition on filling ornamental lakes or ponds (except under specified conditions); and limits on washing vehicles at commercial car washing facilities. The use of potable water to wash or clean a vehicle, whether motorized or not, is prohibited at a commercial car washing facility that does not utilize a re-circulating water system. Level 3 prohibits watering or irrigating, unless maintenance of vegetation, including trees and shrubs, are watered with a hand-held bucket or similar container or a hand-held hose equipped with a positive, self-closing, water-shut-off nozzle or device. Maintenance of existing landscape necessary for fire protection, erosion control, or protection of protected species or certain other landscaped areas, such as public parks and playing fields, is allowed provided that such irrigation does not exceed two days per week and is conducted in accordance with the time restrictions. Level 3 also requires that all leaks, breaks, or other malfunctions in the water user's plumbing or distribution system be repaired within 24 hours of notification. At present, Culver City is observing Level 1 water restrictions.

Wastewater

The City's Municipal Code sets specific wastewater collection and treatment facilities requirements. Section 5.02.005 of the City's Municipal Code requires a City-issued connection permit to connect to the City's wastewater collection system. Section 5.02.220 of the City's Municipal Code establishes a Sewerage Facilities Charge for new connections to the Culver City wastewater collection system which represents the proportionate cost of providing service to the new development. The City Engineer may require a project applicant to submit plans and

other information necessary to determine the applicable sewage facilities fees during plan check review, with the fees based on a standard formula that includes the proposed square footage and types of land uses. Section 5.02.035 of the City's Municipal Code establishes a Sewer User Fee, which is collected annually from Culver City property owners, for the cost, maintenance, repair and improvement of that portion of the City of Los Angeles sewerage system (i.e., wastewater conveyance systems) used jointly by Culver City and the City of Los Angeles under the Amalgamated Agreement.

Solid Waste

The City's Municipal Code addresses solid waste management in Chapter 5.01. Section 5.01.010 through 5.01.040 require that (1) only refuse containers provided or authorized by the City shall be utilized; (2) separate containers are to be provided for Class III solid waste, recyclables, and green waste; (3) new commercial construction must have refuse containers within an enclosed container area that is cement paved and enclosed with 6-foot-high masonry walls with a minimum 6-foot-wide opaque door for ready removal of the containers; and (4) solid and recycling waste material handling comply with the Environmental Programs and Operation Division's exclusive franchise for services. Per Section 5.01.100, City Building and Demolition Permits are issued with the condition that the permittee agrees to abide by the provisions of Chapter 5.01.

Electric Power and Natural Gas

Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to Chapter 15.02.1005 of the City's Municipal Code, the City requires 1 kilowatt (kw) of photovoltaic (PV) power installed per 10,000 square feet (sf) of new development. The City's Municipal Code includes an option to pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2, Exceptions of the California Building Code. Under Chapter 17.320.035 of the City's Municipal Code, the City goes beyond CALGreen Building Code standards and requires at least 20 percent electric vehicle (EV) capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.⁵⁵ Additionally, Sections 4.408.1 and 5.408.1, Construction Waste Management, require the recycle and/or salvage for reuse a minimum of 75 percent of nonhazardous construction and demolition waste.

In 2009, the City adopted the Green Building Program as Chapter 15.02.100 of the City's Municipal Code, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting has to be either fluorescent, LED or other type of high-efficiency lighting,

⁵⁵ Culver City Zoning Code, 2023. Title 17, Section 17.320, Off-Street Parking and Loading. https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed April 2023.

and specific features for parking garages would require all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

Telecommunications

Section 11.20 of the City's Municipal Code outlines rules and regulations related to telecommunications installation within Culver City. The intent of the Code is to:

1. To enable the City to discharge its public trusts in a manner consistent with rapidly evolving federal and state regulatory policies, industry competition, and technology development.
2. To authorize and to manage reasonable access to the City's public right-of-way and public property for telecommunications purposes on a competitively neutral and nondiscriminatory basis.
3. To obtain fair and reasonable compensation for the City and its residents for authorizing the private use of the public rights-of-way and public property, which are recognized to be valuable public assets, held in trust by the City.
4. To foster and to promote competition in telecommunications services, minimize unnecessary local regulation of telecommunications service providers, and encourage the delivery of advanced and competitive telecommunications services on the broadest possible basis to local government and to the businesses, institutions and residents of the City.
5. To establish clear local guidelines, standards and time frames for the exercise of local authority with respect to the regulation of telecommunication service providers, including establishment and enforcement of consumer service standards and technical standards.
6. To encourage the profitable deployment of advanced telecommunications infrastructures that satisfy local needs, deliver enhanced government services, and provide informed consumer choices in an evolving telecommunication market.

Culver City Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, CPA became the new electricity supplier for Culver City. With this change, CPA purchases the renewable energy resources for electricity and SCE delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent, or opt out of the CPA to remain with SCE as their provider.

Culver City Information Technology Department

The Culver City Information Technology Department (IT) is responsible for providing computing, telecommunications, and network service to all departments and divisions within the city. IT

provides project management, systems planning, design, and programming support for the enhancement of existing and new systems.⁵⁶

IT also provides high-speed fiber-optic internet cables for Culver City businesses to promote economic development. Culver City's municipal fiber network, known as Culver Connect, has a 21.7-mile network backbone in three geographical network rings interconnected by "ring ties" of approximately 3.1 route miles of fiber. The network backbone is comprised of 576 strands of entirely undergrounded fiber. There are three hub facilities located in the city that house City-owned network electronics. The City leases two fiber connections to carrier hotels at One Wilshire in Los Angeles and Equinix (LA3) in El Segundo.

4.18.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to utilities and service systems if the project would:

- Threshold UTL-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- Threshold UTL-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
- Threshold UTL-3:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- Threshold UTL-4:** 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.
- Threshold UTL-5:** Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Methodology

The analysis in this section addresses impacts on public utilities and City infrastructure due to projected population growth that would result from the Project.

Water

The Project's demand for domestic water was assessed in relation to GSWC's and LADWP's ability to supply water pursuant to their 2020 UWMPs. Water demand was calculated based on

⁵⁶ Culver City, 2023d. Technology. <https://www.culvercity.org/City-Hall/Departments/IT>. Accessed April 2023.

LADWP projections of water unit use factors identified in the 2020 UWMP. The estimated water demand associated with projected growth under the General Plan 2045 was compared with the available supply.

Wastewater

Potential impacts of the Project on the existing public wastewater infrastructure are analyzed by comparing the estimated wastewater generation associated with projected growth under the General Plan 2045 with the calculated available capacity of the existing facilities. Considerations for determination include a description of the existing wastewater systems within the Planning Area, including capacity and current flows; summary of adopted wastewater-related plans; and an evaluation of projected wastewater needs under the Project.

In order to evaluate treatment capacity, the Project's estimated wastewater generation and projected peak flows were compared with the available treatment capacity within the HWRP and JWPCP. Cumulative wastewater generation was compared with the available capacity of the HWRP and JWPCP.

Electric Power, Natural Gas, and Telecommunications Facilities

The analysis evaluates the potential impacts of the Project on existing energy infrastructure by identifying required regulations that would ensure Project energy demand could be met with available capacity. During construction of future development, energy would be consumed in the form of electricity associated with conveyance of water, lighting, and other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Operational energy consumption would include electricity and natural gas from uses associated with future development such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances.

Solid Waste

The analysis of solid waste impacts addresses the amount of solid waste that would be generated by projected growth under the General Plan 2045, and whether sufficient landfill capacity is available to accommodate the projected volumes of waste so as to not exceed state or local standards or otherwise impair the attainment of solid waste reduction goals. The existing and projected amount of solid waste generated is determined by using a per unit waste generation factor for the various uses, which is derived from relevant guidance documents from CalRecycle and the USEPA. The analysis focuses on waste generation rates rather than disposal rates, which are reduced significantly by state and local diversion programs, and thus provides a conservative analysis of the impacts on solid waste facilities that would be caused by the Project. The availability of landfill capacity is derived from the CoIWMP 2020 Annual Report. The Project's net increase in waste is compared to existing and planned capacities to determine the Project's potential impact.

Subsequent environmental review at the project level may be required to determine whether a specific development project would result in a significant environmental effect regarding the capacity for utility and service systems to adequately serve the future project, including such impacts from the construction of water distribution lines, wastewater collect system

components, storm drainage conveyance pipes or facilities, or disposal of solid waste. Project-level review, if necessary, will occur when proposed development plans are prepared.

Project Impact Analysis

New or Expanded Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities

Threshold UTL-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Impact Statement UTL-1: While the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, and stormwater drainage facilities, future development under the Project could require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities. However, the construction or relocation of these facilities would not cause significant environmental effects. Therefore, impacts would be less than significant.

General Plan 2045

The Project is projected to accommodate 21,600 new residents, 12,700 new housing units, 16,260 new jobs, and 3,696,800 new square feet of non-residential building space through the 2045 horizon year. These increases would result in an increased demand for water, wastewater treatment, storm drainage, electric power, natural gas, and telecommunication services which may require the construction or relocation of facilities which could cause significant environmental impacts. Each service is discussed separately below.

Water

As noted below in Impact UTL-2, the City and local water providers have water conservation measures and programs to reduce water demand. Further, the General Plan 2045 includes policies that would reduce water demand of future development allowed under the Project. Also described under Impact UTL-2, both GSWC and LADWP project sufficient water supply availability under normal, single dry and multiple dry years. While growth under the Project was not specifically accounted for in the 2020 UWMP for each local water provider, GSWC and LADWP would be required to account for this projected growth during the next UWMP update cycle in 2025. Thus, the UWMP would account for future development in the Planning Area in the planning process prior to the General Plan Update's horizon year of 2045. In the event of a water supply shortage as described in the GSWC's and LADWP's 2020 UWMPs, GSWC and LADWP can implement the respective Water Shortage Contingency Plans (WSCPs).^{57,58} The WSCPs require

⁵⁷ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area, Chapter 6. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

⁵⁸ Los Angeles Department of Water and Power, 2021. 2020 Urban Water Management Plan, pg. ES-26. May 2021. https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F9314518570%2F1.%20LADWP%202020%20UWMP.pdf. Accessed April 2023.

water response actions to six water shortage stages, which correspond to progressively severe water shortage conditions as compared to the normal reliability condition.

Each individual project would be required to demonstrate the availability of water to service the development, as required and applicable, in the form of will-serve letters and, for larger projects, preparation of a WSA per SB 610. If additional facilities were to be constructed, separate environmental analysis would be required. The City currently complies with the statutory requirements listed in the regulatory section, and the General Plan 2045 ensures that the City would continue to comply with the state and federal regulatory requirements. Overall, the General Plan 2045 policies contain various methods of water conservation and water planning, such as expanding and enhancing existing water conservation measures, mandates, and strategies to optimize wise use of water (Policy INF-2.1); restricting and eliminating potable water use for primarily non-edible irrigated landscapes where alternative water sources are available (Policy INF-2.6); providing dual plumbing for all new public parks and landscape projects in anticipation of future water recycling or on-site water capture, treatment, and re-use infrastructure to be used for irrigation (Goal INF-4 and associated policies, Policy INF-2.8); and providing resources and guidance for conventional lawn conversion to drought tolerant landscaping (Policy INF-2.5), which would improve water management in the Planning Area.

, [Most new development allowed under the Project is expected to be infill and would rely on the existing distribution network that has sufficient capacity to convey available water supplies.] Moreover, it is anticipated that the City's overall water infrastructure system would be improved over the next 25 years, particularly as redevelopment occurs and the system services additional residences and businesses. If future development under the General Plan 2045 would require the construction and operation of new or expanded water supply facilities, construction or expansion of such facilities would be subject to project-level environmental review in accordance with CEQA at the time it is proposed. This project-level review would identify any significant environmental impacts that could result from the construction and operation of such facilities and would identify project-specific mitigation measures to lessen or avoid any significant impacts as feasible. Furthermore, beyond construction and installation of new transmission and distribution infrastructure new or expanded water supply facilities undertaken by the City, i.e. water treatment plants, water reclamation/recycling facilities, pump stations, would be the responsibility of Metropolitan, LADWP and GSWC to plan and design and construct new water supply facilities and would also be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, impacts associated with implementation of the Project would be less than significant.

Wastewater

As discussed under Impact UTL-3, the General Plan 2045 includes policies and actions that would reduce the demand for wastewater treatment. In accordance with City requirements, new development allowed under the Project would be subject to the latest adopted edition of the California Plumbing Code and CALGreen Code, including the provisions for water-efficient fixtures and toilets, which would reduce the amount of effluent entering the wastewater system. In addition, as discussed under Impact UTL-3, there is sufficient capacity at the HWRP and JWPCP to accommodate wastewater collection and treatment generated by the Project.

Future development allowed under the Project would be located within urban areas of the Planning Area and near existing wastewater infrastructure. In addition, the City would comply with applicable current and future statutory requirements. Therefore, the Project would not result in insufficient wastewater collection and treatment and no new or expanded wastewater treatment facilities would be needed. Impacts would be less than significant.

Stormwater Drainage

As discussed in Impact HYD-3 in Section 4.9, *Hydrology and Water Quality*, future development allowed under the Project would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County Municipal Separate Storm Sewer System Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County Low Impact Development Ordinance, Sections 5.05.010 and 5.05.040 of the City's Municipal Code, and the City's Standard Urban Stormwater Mitigation Plan and Stormwater Quality Master Plan. In addition, the Conservation Element includes policies to ensure City projects and other proposed projects along Ballona Creek include features and BMPs to increase capture of urban runoff and increase infiltration, which aim to reduce stormwater runoff and hydromodification effects, including erosion, siltation, and flooding related to Ballona Creek (Policies INF-6.1, C-6.2). The Safety Element also includes policies such as storm drain system evaluation and culvert and storm drain system maintenance to improve the City's stormwater drainage system (Policies S-6.6, S-6.7, S-6.8, S-6.9). City requirements and policies would ensure that runoff would not inundate existing storm drainage facilities such that new or expanded facilities would be required. Therefore, impacts would be less than significant.

Electric Power

It is possible that future development allowed under the General Plan 2045 could result in the provision of new electrical power facilities, including new or upgraded substations and/or transmission lines. However, all new development would be subject to the latest adopted edition of the CALGreen Code, which establishes mandatory energy efficiency measures for new residential and non-residential buildings. Compliance with current CALGreen requirements and proposed General Plan policies that promote renewable energy generation and energy efficiency would ensure that new development associated with the implementation of the General Plan 2045 would be energy efficient, thus reducing the need for new electrical power infrastructure (Goal GHG-2, Policy GHG-2.4). Should upgrades to new facilities be required, construction of those facilities could result in adverse environmental effects. Future facilities would be subject to environmental review under CEQA and required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, Project-related electricity demand would not result in additional impacts related to the provision of electrical power infrastructure, and this impact would be less than significant.

Natural Gas

It is possible that future development allowed under the General Plan 2045 could result in the provision of new natural gas facilities, including new and/or upgraded pipelines. SoCalGas projects that total gas demand in its service area would decline at an annual rate of 1 percent

from 2020 to 2035 due to modest economic growth and CPUC-mandated energy efficiency standards and projects.⁵⁹ Additionally, all new development would be subject to energy efficiency standards contained in the latest adopted edition of the CALGreen Code, thus reducing the need for new natural gas infrastructure. Should upgrades be required, construction of those facilities could result in adverse environmental effects. Future facilities would be subject to environmental review under CEQA and required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, Project-related natural gas demand would not result in additional impacts related to the provision of natural gas infrastructure, and this impact would be less than significant.

Telecommunication

It is possible that future development allowed under the General Plan 2045 could result in the provision of new telecommunication facilities. Should upgrades to telecommunication infrastructure be required, construction of those facilities could result in adverse environmental effects. Future facilities would be subject to environmental review under CEQA and required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, Project-related demand for new telecommunications services would not result in additional impacts related to the provision of telecommunication infrastructure, and this impact would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented in the development that would within the city over time. Construction of new or expanded water, wastewater treatment, and stormwater drainage, electric power, natural gas, or telecommunications facilities that could occur as a result of growth under the Project would be reviewed by the City for compliance with applicable requirements and mitigation measures in this Draft PEIR. Therefore, the Zoning Code Update itself would not result in significant adverse effects and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Infrastructure Element

Goal INF-2: Water conservation. Water conservation strategies are implemented and expanded citywide to meet sustainability targets and ensure future resiliency.

INF-2.1: Water conservation. Expand and enhance existing water conservation measures, mandates, and strategies to optimize wise use of water.

INF-2.5: Drought-tolerant landscaping. Provide resources and guidance for conventional lawn conversion to drought tolerant landscaping.

⁵⁹ California Gas and Electric Utilities, 2020. 2020 California Gas Report. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_UTILITY_Biennial_Comprehensive_Filing.pdf. Accessed April 2023.

INF-2.6: Water use on non-edible irrigated landscapes. Restrict and eliminate potable water use for primarily non-edible irrigated landscapes where alternative water sources are available, including captured rainwater, greywater, and recycled water.

INF-2.8: Dual plumbing. Provide dual plumbing for all new public parks and landscape projects in anticipation of future water recycling or on-site water capture, treatment and re-use infrastructure to be used for irrigation.

Goal INF-4: Water reuse networks. Water reuse networks are expanded and optimized throughout the city at the district and parcel scales.

INF-4.1: Greywater infrastructure. Develop greywater infrastructure to support city, district, and parcel level treatment and reuse strategies.

INF-4.2: Repurposing of stormwater management infrastructure. Optimize the repurposing stormwater management infrastructure approaching the end of its service life to support city-wide stormwater management and water reuse programs in alignment with water conservation programs.

INF-4.3: Availability of recycled water supply. Explore opportunities to increase the availability of recycled water supply (i.e., install purple-pipe infrastructure).

INF-4.4: Water provisioning. Incorporate recycled and reuse water strategies in water provisioning.

INF-4.5: Incentivize water recycling. Encourage and incentivize water recycling techniques such as rainwater capture barrels and cisterns for outdoor watering purposes.

Conservation Element

C-6.1: Flood control coordination. Coordinate with other jurisdictions to forward plans and programs that help achieve regional goals for flood control and improve water quality.

C-6.2: Runoff capture and infiltration along Ballona Creek. Ensure City projects and proposed projects along Ballona Creek include features and BMPs to increase urban runoff capture and infiltration, while prioritizing nature-based solutions, like bioswales.

Greenhouse Gas Reduction Element

Goal GHG-2: Green buildings. Green and decarbonized buildings are the standard for new construction, major renovations, and existing building retrofits.

GHG-2.3: Water efficiency. Encourage age implementation of both residential and nonresidential voluntary measures of the California Green Building Standards Code (CALGreen), to reduce or eliminate potable water use outdoors.

GHG-2.4: Energy and water efficiency. Improve the energy and water efficiency of new and existing buildings.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

Water Supplies

Threshold UTL-2: The Project would have a significant impact if sufficient water supplies were not available to serve future development allowed by the General Plan 2045, Zoning Code Update, and reasonably foreseeable future development during normal, single dry, and multiple dry years.

Impact Statement UTL-2: Sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, single dry, and multiple dry years would not be available. Therefore, the Project would result in potentially significant impact related to water supplies.

General Plan 2045

The Project is projected to accommodate 21,600 new residents, 12,700 new housing units, 16,260 new jobs, and 3,696,800 new square feet of non-residential building space through the 2045 horizon year. This increase in development would result in an increased demand for potable water.

As previously discussed, Culver City is served by two water service providers: GSWC and LADWP. GSWC serves the Culver City service area through surface water purchased from Metropolitan. GSWC's projected demands for potable and non-potable use within the Culver City service area are shown in Table 4.18-1, and LADWP's projected demands for potable and non-potable use are shown in Table 4.18-2.

Water Supply Availability

As discussed in Section 4.13, *Population and Housing*, the population, housing, and employment projections assumed for the General Plan 2045 are higher than SCAG's 2045 estimates since the Project provides for additional population, housing, and employment capacity not anticipated by SCAG. Subsequently, Metropolitan's regionwide water demands were based on the SCAG's 2020–2045 RTP/SCS⁶⁰ and were used by Metropolitan's member agencies in their 2020 UWMPs. In this case, GSWC's 2020 UWMP and LADWP's 2020 UWMP used water demand projections provided by Metropolitan that were based on SCAG's 2045 population, housing, and employment projections. At the time, GSWC's 2020 UWMP and LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's and LADWP's water supply projections in their respective 2020 UWMPs are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with SCAG's 2020 RTP/SCS. The analysis included in this EIR indicates that implementation of the General Plan 2045 and Zoning Code Update would conform with the use and intensity of development permitted within the City of Culver City. However, as previously stated, the Project could result in growth and an increase in intensity above these projections. Notably, GSWC and LADWP

⁶⁰ Metropolitan Water District of Southern California, May 2021

would account for this growth during the next UWMP update cycle in 2025 and thus, would account for future development in the Planning Area prior to the General Plan Update's horizon year of 2045.

As stated in GSWC's 2020 UWMP, GSWC has reliable supplies to meet its retail customer demands in normal, single dry years, and five consecutive dry year conditions through 2045, and GSWC's contract water from WBMWD is resilient during dry conditions.⁶¹ As a result, GSWC is not faced with shortages during normal or dry years through the year 2045. In addition, as stated in the LADWP's 2020 UWMP, LADWP also has reliable supplies to meet demand under normal, single dry year, and five consecutive dry year conditions through the year 2045.⁶²

Considering the timing, the anticipated water demand associated with the Project could exceed the GSWC and LADWP 2020 UWMP's 25-year water demand growth projections. However, based on the on-going water resources planning and analysis in Metropolitan's 2015 and 2020 IRP's, as discussed in Section 4.18-3, and in combination with long-term contractual agreements with Metropolitan and its member agencies, GSWC's and LADWP's 2020 UWMPs projected water supplies for normal, single-dry, and multiple-dry years should be adequate to meet demand within the planning horizon. It should be noted that as a region, demand has decreased through ongoing passive and active water conservation efforts, while supply reliability continues to improve through local and regional efforts in desalination, stormwater capture, groundwater use and replenishment, direct and indirect potable reuse projects, additional storage and transfers and agreements.

As shown in Tables 4.18-3 through 4.18-8, based on available information from Metropolitan, WBMWD, LADWP, and GSWC, and consistent with historical operations and agreements, the City's water suppliers would be able to purchase additional water supplies available through Metropolitan and/or WBMWD's multiple and diverse sources in their supply portfolios to meet the projected future demand. As a result, these tables show no difference between supply and demand, nor do they show demand reductions, because the future demand projections already incorporate conservation and water use efficiency. For the same reason, the demand estimates for single dry and multiple-dry-year scenarios are the same as for demands for a normal year. GSWC and LADWP are not expected to rely on water use cutbacks to meet demand in dry years, but additional demand reduction measures are anticipated to curtail demand in dry years.

Table 4.18-9, *General Plan 2045 Water Demand Projections*, summarizes estimated water demand within the Planning Area under the General Plan 2045. Although growth would be incremental over the planning horizon, and water demand associated with future development under the General Plan 2045 is also expected to grow incrementally, at build out water demand associated with the General Plan 2045 would be approximately 3,527,970 gpd, or approximately 3,954 afy.

⁶¹ Golden State Water Company, 2021. 2020 Urban Water Management Plan: Culver City Service Area. <https://www.gswater.com/urban-water-management-plan>. Accessed March 2023.

⁶² Los Angeles Department of Water and Power, 2021. 2020 Urban Water Management Plan. May 2021. https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F9314518570%2F1.%20LADWP%202020%20UWMP.pdf. Accessed April 2023.

**TABLE 4.18-9
 GENERAL PLAN 2045 WATER DEMAND PROJECTIONS**

Land Use	Net Change (General Plan 2045 – Existing) Dwelling Units or Jobs in Plan Area	Daily Water Use Rate^a	Daily Water Demand (gpd)	Annual Water Demand (afy)
Residential	12,700 units	189 (gpd/unit)	2,400,300	2,691
Commercial ^b	15,510 jobs	67 (gal/employee/day)	1,039,170	1,164
Industrial ^b	750 jobs	118 (gal/employee/day)	88,500	99
Total General Plan 2045 Water Demand (Year 2045)			3,527,970	3,954

NOTES:

^a Based on water use factors identified in Exhibit 2L of the LADWP 2020 UWMP.

^b Job totals provided by Raimi + Associates, 2023

SOURCE: ESA, 2023

Individual development proposals that meet the definition of a project under CEQA would be required to address water supply as part of the CEQA process, and for qualifying projects, a WSA would be required pursuant to SB 610 for inclusion in the project’s CEQA analysis. The WSA compares water supply and expected demand from the development being proposed to existing and forecasted water supplies in the most recent UWMP. A Written Verification of Supply per SB 221 is prepared as a condition of approval for a subdivision map of 500 units or more. The Written Verification of Supply serves as a mechanism to provide sufficient evidence that adequate water supplies are available before construction begins and is prepared and adopted by the water supplier and approved by the land use authority. Depending on the project, one or both analyses may be required.

In the event of a water shortage, GSWC and LADWP would rely on their Water Shortage Contingency Plans (WSCPs), which are to be engaged in the case of a water shortage event, such as a drought or supply interruption. The WSCPs for both GSWC and LADWP include six levels to address shortage conditions ranging from up to 10 percent to greater than 50 percent shortage, identifies a suite of demand mitigation measures to implement at each level, and identifies procedures to annually assess whether or not a water shortage is likely to occur in the coming year. The WSCP requires water response actions to six water shortage stages, which correspond to progressively severe water shortage conditions (up to 10 percent, 20 percent, 30 percent, 40 percent, 50 percent, and greater than 50 percent shortage) as compared to the normal reliability condition. The following six (6) Stages list the shortage response actions:

- Stage 1 (0 to 10 percent shortage) – Stage 1 is a “Water Alert” where voluntary conservation is encouraged.
- Stage 2 (10 percent to 20 percent shortage) – Stage 2 is a “Moderate Shortage” and will be implemented if the Stage 1 restrictions are deemed insufficient to achieve necessary demand reductions due to water supply shortages.
- Stage 3 (20 percent to 30 percent shortage) – Stage 3 is a “Severe Shortage” that requires water allocations and mandatory conservation.

- Stage 4 (30 percent to 40 percent shortage) – Stage 4 is a “Critical Shortage” that includes all steps taken in prior stages regarding allocations and mandatory conservation.
- Stage 5 (40 percent to 50 percent shortage) – Stage 5 is a “Shortage Crisis” that includes all steps taken in prior stages regarding allotments and mandatory conservation. This stage will be implemented in the event that the source of supply is severely curtailed to the level that requires each customer to restrict their water use for only human health and safety purposes.
- Stage 6 (50 percent or greater shortage) – Stage 6 is an “Emergency Shortage” condition that includes all steps taken in prior stages regarding allotments and mandatory conservation.

GSWC and LADWP also promote water conservation through rebates, conservation kits (which include high-efficiency showerheads and faucet aerators), and programs (which include turf replacement and free landscape training classes).

The City is taking steps to decrease its overall water demand. For example, the Water Conservation Plan includes mandated and voluntary water conservation measures for businesses and residents to achieve targeted water reductions and reduce water consumption. The City also has a water conservation and supply shortage program as set forth in Chapter 5.03 of the City’s Municipal Code which is intended to reduce water consumption through conservation, and to enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water within the City to avoid and minimize the effect and hardship of water shortage to the greatest extent possible.

The General Plan 2045 includes policies and actions, such as expanding and enhancing existing water conservation measures, mandates, and strategies; requiring and encouraging water usage reduction strategies in landscaping design; and maintaining and increasing City groundwater well levels for emergency use and diverse future water supply opportunities, that would reduce water demand of future development allowed under the Project. Implementation of Policies INF-2.1 through INF-2.10 in the General Plan 2045 would reduce the overall existing and future water usage in the Planning Area by curbing demand for domestic and commercial purposes and promoting water conservation strategies. Goal INF-3 specifically addresses water security and groundwater recharge and Goal INF-4 addresses water reuse networks.

Furthermore, all new development would be subject to water conservation standards contained in the CALGreen Code. Compliance with current CALGreen requirements would ensure that future development allowed under the General Plan 2045 would establish water conservation features.

Therefore, given that (1) Metropolitan continues to improve regional water supplies through its IRP planning process and its 26 member agencies continue to improve local water supplies; (2) the GSWC and LADWP have the ability to implement a WSCP in the case of supply shortages, and demonstrated its effectiveness during the historic 2013–2017 drought; and (3) the increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available within the region including GSWC and LADWP to meet all future

demands within the Culver City service area. Based on the above there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

In addition, future development would be required to comply with Chapter 5.03 of the City's Municipal Code, the City's Water Conservation Plan, and General Plan 2045 policies aimed at reducing demand over time, as discussed above in Water Supply Availability. Therefore, sufficient water supplies are expected to be available; however, additional demand reductions may be required in drought years. Therefore, implementation of the General Plan 2045 would result in less than significant impacts to water supply.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that will occur throughout the city over time. As the City receives applications for subsequent development under the Project, the City would review the applications to ensure compliance with applicable requirements to ensure there are sufficient water supplies to serve the development. As indicated above, sufficient water supplies are expected to be available; however, additional demand reductions may be required in drought years. Given that the Zoning Code Update implements the General Plan 2045, as was concluded with the General Plan 2045, the Zoning Code Update would result in a less than significant impact to water supply.

Applicable Proposed General Plan Goals and Policies

Infrastructure Element

Goal INF-2: Water conservation. Water conservation strategies are implemented and expanded citywide to meet sustainability targets and ensure future resiliency.

INF-2.1: Water conservation. Expand and enhance existing water conservation measures, mandates, and strategies to optimize wise use of water.

INF-2.2: Water conservation rebate outreach. Increase citywide outreach and residential and commercial participation in LADWP, GSWC, West Basin Water District and other water conservation rebate and incentive programs (residential program rebates, high efficiency water conservation kits, multifamily and commercial/institutional programs, Water Savings Incentive Program, Large Landscape Survey Program, etc.).

INF-2.3: Water Conservation Plan. Continually revisit and revise the City's Water Conservation Plan and ensure municipal and resident enforcement of the plan.

INF-2.4: Dry weather runoff reduction. Reduce dry weather runoff, and track baseline runoff volumes at key facilities, including the reused Mesmer Station to monitor and capture dry weather flows and to divert them for treatment at the Hyperion Wastewater Treatment Reclamation Plant

INF-2.5: Drought-tolerant landscaping. Provide resources and guidance for conventional lawn conversion to drought tolerant landscaping.

INF-2.6: Water use on non-edible irrigated landscapes. Restrict and eliminate potable water use for primarily non-edible irrigated landscapes where alternative water sources are available, including captured rainwater, greywater, and recycled water.

INF-2.7: Information on irrigation and water treatment standards. Create and equitably share resources that provide information on appropriate irrigation methods and water treatment standards for both productive and non-productive landscapes.

INF-2.8: Dual plumbing. Provide dual plumbing for all new public parks and landscape projects in anticipation of future water recycling or on-site water capture, treatment and re-use infrastructure to be used for irrigation.

INF-2.9: Mulching and composting. Expand mulching and composting activities on City-owned sites to promote healthy soils and retain water in irrigated landscapes.

INF-2.10: Healthy water and soils strategies. Integrate healthy water and soils strategies to support expansion of urban agriculture practices.

Goal INF-3: Water security and groundwater recharge. Culver City actively contributes to regional initiatives to improve security and diversify the water supply and groundwater recharge efforts.

Goal INF-4: Water reuse networks. Water reuse networks are expanded and optimized throughout the city at the district and parcel scales.

Mitigation Measures

Impacts regarding water supply were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to water supply.

Wastewater Treatment

Threshold UTL-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would result in a determination by the wastewater treatment provider which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

Impact Statement UTL-3: The existing wastewater treatment facilities serving the Project would have sufficient capacity to treat the projected wastewater demand generated by the Project. Therefore, the Project would result in a less-than-significant impact related to wastewater treatment.

General Plan 2045

As discussed, implementation of the General Plan 2045 would result in 21,600 new residents, 12,700 new housing units, 16,260 new jobs, and 3,696,800 new square feet of nonresidential building space through the 2045 horizon year. Future development would result in an increase in the generation of wastewater and demand for wastewater treatment capacity. As the

demand for wastewater treatment capacity increases, there may be a need to increase wastewater conveyance and treatment facilities, the construction of which could cause environmental impacts.

Table 4.18-10, *Projected Wastewater Generation*, shows that implementation of the General Plan 2045 could result in approximately 3.9 mgd (4,455 AFY). As mentioned in Section 4.18.2, *Environmental Setting*, wastewater in the Planning Area is treated at either the HWRP or the JWPCP. Based on a current ADFW of 275 mgd and capacity of 450 mgd at the HWRP and a current treatment of 260 mgd and capacity of 400 mgd at the JWPCP, there is a remaining capacity of 175 mgd and 140 mgd, respectively. Given that the Project would generate approximately 3.9 mgd, the remaining treatment capacity at the HWRP and the JWPCP would be sufficient to accommodate the increase in wastewater demand citywide, and no major improvements would be required.

**TABLE 4.18-10
PROJECTED WASTEWATER GENERATION**

Land Use	Quantity (Units/Square Feet)	Wastewater Generation Factor (gpd/unit)^a	Total Wastewater Generation (gpd)
Residential	12,700 units	260 gpd/unit	3,302,000 gpd
Commercial	3,332,000 sf	0.20 gpd/square foot	666,400gpd
Industrial	364,800 sf	0.025/square foot	9,120 gpd
Institutional	0 sf	0.2 gpd/square foot	0 gpd
Project Total			3,977,520 gpd

NOTES: sf = square feet; gpd = gallons per day.
^a The wastewater generation factors are based on LACSD's wastewater generation factors. Los Angeles County Sanitation Districts, 2023b. Loadings for Each Class of Land Use.
SOURCE: ESA, 2024.

No new major sewer upgrades are anticipated or proposed as part of the General Plan 2045. All new development in the city would be subject to sewer capacity considerations as part of the City review process. Improvements and upgrades to sewer lines are prioritized based on need. Development fees are collected from each project and used to fund the highest priority improvements.

The proposed land use changes associated with the General Plan U2045 and the increase in wastewater flows would not exceed the treatment capacity at the HWRP or the JWPCP. Therefore, impacts related to wastewater would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented in the development that would occur throughout the City over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in insufficient wastewater treatment capacity. In addition, the City would review applications for subsequent development for compliance with

the applicable requirements to ensure there is sufficient wastewater treatment capacity to serve the development. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

There are no goals or policies specifically related to wastewater management.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to wastewater treatment.

Solid Waste

Threshold UTL-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Impact Statement UTL-4: The amount of solid waste generated by the Project would not exceed the remaining capacity of existing County landfills and would not impair the attainment of solid waste reduction goals. Therefore, the Project would result in a less-than-significant impact related to solid waste generation.

General Plan 2045

As described in Section 4.18.2, *Environmental Setting*, all trash collection in the city is managed by the City's EPO with all residential, commercial and industrial solid waste in the city collected by the EPO or its authorized agents. Once collected, the majority of solid waste is disposed of at County landfills.

The General Plan 2045 is projected to accommodate 21,600 new residents, 12,700 new housing units, 16,260 new jobs, and 3,696,800 new square feet of nonresidential building space by the 2045 horizon year. Development and growth in the city would increase the generation of solid waste (both construction and operational waste) which could exceed state or local standards, exceed local infrastructure capacity, or otherwise impair the attainment of solid waste reduction goals.

Construction waste would be required to be diverted from landfills in accordance with Municipal Code Section 15.02.1140. As required, a minimum of 75 percent of the nonhazardous construction and demolition debris from new development or redevelopment would be recycled and/or salvaged for reuse. Construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard would be disposed of in one of a number of inert debris engineered fill operations that are located throughout the county. Any contaminated soil that is found during excavation would be assumed to be disposed of in a facility that could accept such waste.

As shown in **Table 4.18-11, *Estimated Solid Waste Generation***, operationally, future development allowed under the Project would generate approximately 37,084 tons or 26,488.6 cubic yards of solid waste annually.

**TABLE 4.18-11
ESTIMATED SOLID WASTE GENERATION**

Category	Net New	Disposal Rate ^a (pounds/capita/day)	Solid Waste Generation (daily)		Annual Solid Waste Generation	
			Pounds/Capita/Day	Tons	Annual Tons	Cubic Yards ^b
Residents	21,600	6.6	142,560	64.7	23,615.5	16,868.2
Jobs	16,260	5.0	81,300	36.9	13,468.5	9,620.4
Total			223,860	101.6	37,084	26,488.6

NOTES:

^a Disposal rate based on CalRecycle’s calculated disposal rate for 2021 (most recent available information).

^b One cubic yard = 1.4 tons

SOURCE: ESA, 2024.

For the solid waste that would be disposed of at landfills, the 10 Class III landfills in the county have a combined remaining capacity of approximately 142.67 million tons. The annual solid waste generated by the Project would represent approximately 0.03 percent of the remaining capacity of these landfills. Over the life of the General Plan 2045, it is anticipated that 741,680 tons would be generated which is 0.5 percent of the remaining capacity. Therefore, the remaining capacity would be sufficient to accommodate the solid waste generated by future development that would occur from the implementation of the General Plan 2045. In addition, all future development projects proposed in the City would be required to comply with federal, state, and local statutes and regulations related to solid waste, including the California Code of Regulations, California PRC, and Culver City General Plan and Municipal Code. Therefore, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City’s General Plan 2045 are implemented in the development that would occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not result in the generation of solid waste in excess of state or local standards or in excess of the capacity of local infrastructure. Furthermore, future development allowed under the Project would be reviewed by the City for compliance with applicable requirements. Therefore, potential Project impacts with respect to solid waste generation are considered less than significant.

Applicable Proposed General Plan Goals and Policies

There are no goals or policies specifically related to solid waste generation.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to solid waste generation.

Solid Waste Regulations

Threshold UTL-5: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact Statement UTL-5: The Project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste and therefore, impacts would be less-than-significant impact.

General Plan 2045

As discussed, development and growth in the Planning Area would increase the generation of solid waste (both during construction and operation) which could exceed state or local standards, exceed local infrastructure capacity, or otherwise impair the attainment of solid waste reduction goals.

In accordance with City requirements, future development allowed under the Project would be served with solid waste and recycling services provided by the City or its authorized agents (Municipal Code Section 5.01.01). In addition, a minimum of 75 percent of the nonhazardous construction and demolition debris from new development would be recycled and/or salvaged for reuse (Municipal Code Section 15.02.1140). Future development allowed under the Project would also be required to comply with statewide requirements, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. Therefore, future development allowed under the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and the impact would be less than significant.

Zoning Code Update

Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not conflict with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, potential Project impacts with respect to solid waste statutes and regulations are considered less than significant.

Applicable Proposed General Plan Goals and Policies

There are no goals or policies specifically related to solid waste.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Not applicable. The Project would result in less-than-significant impacts related to solid waste statutes and regulations.

4.18.5 Cumulative Impacts Analysis

Water Supply

The geographic context for the analysis of cumulative impacts related to water supply includes the GSWC and LADWP service areas. As described in detail in Section 4.18.4, cumulative water demands could exceed planned levels of supply, which could potentially require building new water treatment facilities or expanding existing facilities beyond what is currently planned for in existing capital improvement plans for water infrastructure and facilities. As discussed above, construction and installation of new transmission and distribution infrastructure would be the responsibility of Metropolitan, LADWP and GSWC. The City's water suppliers would also be responsible to plan, design and construct these new water supply facilities, and would also be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, impacts associated with implementation of the Project would be less than significant.

In addition, each individual development project would be required to demonstrate the availability of water to service the development. Cumulative projects would be required to demonstrate compliance with the statutory requirements listed in the regulatory section, and the General Plan 2045 would ensure that cumulative development in the Planning Area would comply with the state and federal regulatory requirements. As discussed above, if the water service providers should experience a shortage of supply, a WSCP is in place to reduce water consumption. This measure would be implemented in conjunction with other state, regional, county, and local water conservation requirements, water efficiency measures, in addition to Metropolitan activating one or more of its water supply agreements, and other projects described in its 2015 and 2020 IRP and WDMP. When applicable, any additional new development within the Planning Area would be subject, on a project-by-project basis, to independent CEQA review, as applicable, as well as policies in the General Plan 2045, the City's Municipal Code, and compliance with current regulations, including SB 610 and SB 221, which require WSAs for large development projects prior to approval. All cumulative projects would be subject to local, state, and federal permit requirements and would be required to comply with applicable City/County ordinances and General Plan policies, as well as other regulations that address water supply. Future development allowed under the General Plan 2045 would contribute to an increased cumulative demand for water supply, and the growth within the water purveyors' service areas would be considered in the next cycle of UWMPs. Accordingly, impacts associated with future development allowed under the General Plan 2045 would not be cumulatively considerable.

As described above, (1) Metropolitan continues to improve regional water supplies through its IRP planning process and its 26 member agencies are continue to improve local water supplies; (2) the GSWC and LADWP have the ability to implement a WSCP in the case of supply shortages, and demonstrated its effectiveness during the historic 2013–2017 drought; and (3) the

increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available within the region (including GSWC and LADWP) to meet all future demands within the service area. Based on the above there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single dry and multiple dry years. Cumulative water supply impacts would be less than significant.

Wastewater

The geographic context for the analysis of cumulative impacts related to wastewater conveyance and treatment includes the LASAN and LACSD wastewater services areas. All cumulative projects would be required to comply with applicable City/County ordinances and General Plan policies, as well as other regulations related to wastewater collection and treatment. As described under Impact UTL-3, there is sufficient wastewater conveyance and treatment capacity available to serve the Project. As such, the Project's contribution to wastewater impacts would not be cumulatively considerable.

While future development allowed under the General Plan 2045 would result in an increased demand for wastewater collection and treatment, such wastewater collection and treatment can be accommodated (see Impact UTL-3). In addition, future projects would be required to comply with the requirements of the applicable General Plan and the City's Municipal Code that aim to reduce wastewater generation flows. For the reasons described, impacts of the Project related to wastewater conveyance and treatment in conjunction with other cumulative development is not cumulatively considerable. The Project's contribution to cumulative impacts would be less than significant.

Solid Waste

The geographic context for the analysis of cumulative impacts associated with solid waste includes the jurisdictions that are served by the Los Angeles County landfills. Cumulative development within other jurisdictions would contribute to an incremental increase in solid waste delivered to these landfills. Other future projects within the cumulative geographic context would be required to comply with applicable federal, state, and local laws and policies, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. While development and growth in the city under the Project would result in an increased generation of solid waste, the affected landfills would have enough capacity to serve the City (see Impact UTL-4). In addition, future development allowed under the Project would be required to comply with policies and programs of the General Plan and the regulations of the Municipal Code that aim to divert solid waste from landfills. As with the City, all jurisdictions within the region would be required to comply with existing as well as new federal, state, and local statutes and regulations related to solid waste. Therefore, cumulative impacts related to solid waste capacity and compliance with regulatory requirements would be less than significant.

Storm Drainage

The geographic context for analysis of cumulative impacts to storm drain facilities includes the area surrounding the Planning Area. Cumulative development contributes to an incremental

increase in impervious surfaces that could increase stormwater runoff and impact existing storm drain facilities requiring relocated or new facilities. All cumulative projects would be required to comply with City/County ordinances and General Plan policies, as well as other regulations that minimize stormwater runoff. For these reasons, cumulative impacts to storm drainage would be less than significant.

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4.19 Wildfire

4.19.1 Introduction

This section provides an analysis of the potential local and regional environmental impacts on wildfire from implementation of the Project, including potential impacts related to emergency response or evacuation plans, exacerbating wildfire risks, installing or maintenance of associated infrastructure which exacerbate fire risk, and exposing people or structures to significant risks. The section provides context regarding the Planning Area's existing fire protection responsibility, wildfire hazards, and emergency response and evacuation plans, as well as relevant federal, State, and local regulations and programs. Additional analysis related to fire risks with the Project is addressed in Section 4.8, *Hazards and Hazardous Materials*.

4.19.2 Environmental Setting

Culver City and its Sphere of Influence (SOI) (Planning Area) is a highly developed, urban environment located approximately five miles east of the Pacific Ocean, five miles north of Los Angeles International Airport, and eight miles west of downtown Los Angeles. Most of the land area within city limits is developed with urban and suburban development of differing types and densities. However, a few undeveloped or semi-open space areas remain, including Blair Hills, Culver City and Fox Hills Parks, Hillside Memorial and Holy Cross Cemeteries, and portions of the Inglewood Oil Field (IOF) and Kenneth Hahn State Recreation Area. Various habitats and vegetation communities are present within the Planning Area including Coastal Scrub, Coastal Scrub – Degraded, Channelized Streambed (Ballona Creek), Coast Live Oak Woodland, Non-native/Ornamental, Non-native Tree Stands, and Disturbed. Significant remnant patches of native vegetation, and to a lesser degree ornamental and landscaped vegetation, remain within the Planning area, particularly within the Kenneth Hahn State Recreation Area and the portion of the IOF located in the unincorporated County within the SOI.

Fire Protection Responsibility

The entirety of the Planning Area is designated as a Local Responsibility Area (LRA) by the California Department of Forestry and Fire Protection (CAL FIRE), where the local jurisdiction has the responsibility to provide fire protection services for the area. The same is true for the surrounding City of Los Angeles and unincorporated portions of Los Angeles County.

The Culver City Fire Department (CCFD) provides fire protection and emergency services to the entirety of the city. CCFD is made up of a total of 72 employees who are housed at three fire stations (headquartered at Fire Station# 1).¹ Each fire station is equipped with unique

¹ Culver City Fire Department, 2019a. Culver City Fire Department Strategic Plan 2019-2024. <https://www.culvercityfd.org/About-the-Department/Documents>. Accessed May 2023.

equipment and personnel needed to serve the community, with at least 18 sworn personnel on duty at all times.² The three stations located within Culver City include the following:

- Station #1 (Headquarters) at 9600 Culver Boulevard. This station houses an engine company with a crew of three people (captain, engineer, and firefighter), paramedic resources with a crew of two firefighter/paramedics with advance life support (ALS) certification, and a battalion chief command vehicle for the battalion chief.
- Station #2 at 11252 Washington Boulevard. This station houses an engine company with a crew of three people (captain, engineer, and firefighter) and an ambulance with two emergency medical technicians (EMTs).
- Station #3 at 6030 Bristol Parkway. This station houses two engine companies with a crew of three people (captain, engineer, and firefighter) and a crew of four people (captain, engineer, and two firefighters) and paramedic resources with a crew of two firefighter/paramedics with ALS certification.

In addition to its own fire protection services, CCFD has entered into various cooperative and fire assistance agreements with other federal, State, and local jurisdictions within the region and state. Based upon these agreements, most wildfire events and other largescale incidents are responded to by multiple agencies operating under the varying levels of the incident command structure, which is a standardized approach to the command, control, and coordination of emergency response providing a common hierarchy within which responders from multiple agencies can be effective. In such instances, CCFD personnel and equipment could respond to incidents outside of the Department's formal area of responsibility. Conversely, other emergency services organizations throughout the region and state could respond to incidents within CCFD's area of responsibility if needed.

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services to the area within the City's SOI. LACFD services about 2,300 square miles, including 60 cities and unincorporated communities, and serves approximately 4.1 million residents. There are 4,700 total personnel working within LACFD's emergency and business operations bureaus, including firefighters, dispatchers, lifeguards, nurses, and administrative support. LACFD stations are located nearby in the City of Los Angeles and unincorporated Los Angeles County. The nearest LACFD stations to the Planning Area are Station #43 located at 3690 Motor Ave in the City of Los Angeles approximately one mile north of the Planning Area, and Station #94 located at 4470 Coliseum Street in the City of Los Angeles approximately one mile east of the Planning Area.

Wildfire Hazards

A wildland fire is a large destructive fire that can spread quickly through vegetative fuels.³ Wildfires can be caused by human error (such as campfires), intentionally by arson, by

² Culver City Fire Department, 2019b. Community Risk Assessment, Standards of Cover. https://www.culvercityfd.org/files/sharedassets/fire/crasoc_website_20190618.pdf. Accessed May 2023.

³ Culver City, 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed May 2023.

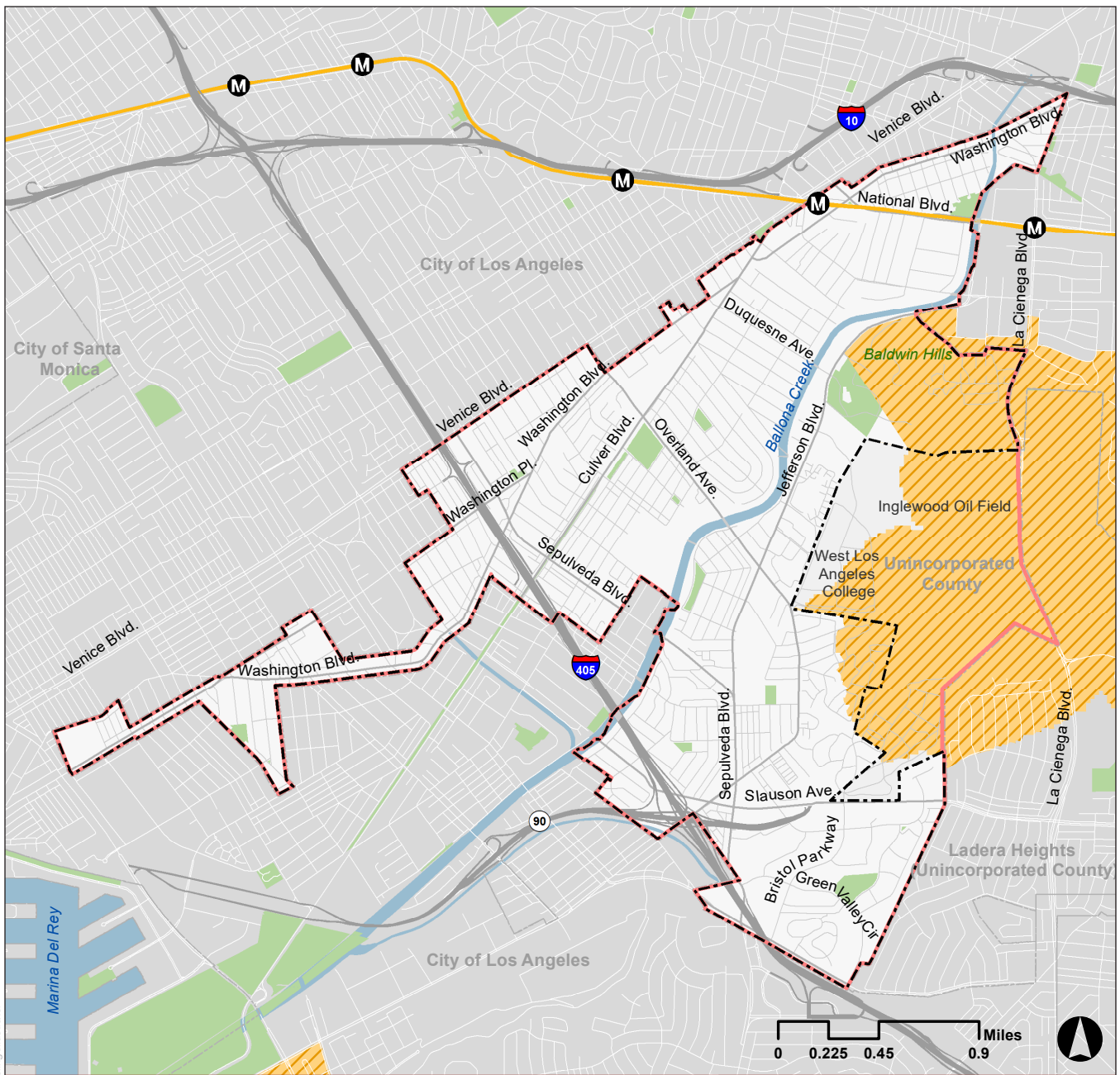
mechanical sources of ignition (such as heaters and generators), and by natural events (such as lightning). Electrical equipment, such as power lines and transformers, can also cause a wildfire. Wildfires often occur in forests or other areas with ample vegetation. In areas where structures and other human development meets or intermingles with wildland or vegetative fuels (referred to as the wildland-urban interface [WUI]), wildfires can cause significant property damage and pose extreme threats to public health and safety. Wildland fires have historically occurred in the surrounding Los Angeles County region but have not affected the city (including the more recent 2019 Getty Fire in Los Angeles, 2003 Padua Fire in Los Angeles County, and the 1993 Topanga Fire in Malibu).

There are three categories of WUI fire: 1) where well defined urban and suburban development presses up against open wildland areas; 2) where isolated homes characterize the mixed WUI (subdivisions and small communities situated predominantly in wildland settings); and 3) where islands of wildland vegetation occur inside a largely urbanized area. Southern California faces challenges with wildfire hazards from the increasing number of houses being built in the WUI. Every year the growing population has expanded further into the hills and mountains, including into forest lands. The increased interface between urban/suburban areas and the open spaces created by this expansion has produced a significant increase in threats to life and property from fires and has pushed existing fire protection systems beyond original or current design and capability.

Certain conditions must be present for significant interface fires to occur. The most common conditions include hot, dry and windy weather; the inability of fire protection forces to contain or suppress the fire; the occurrence of multiple fires that overwhelm committed resources; and a large fuel load (dense vegetation). Once a fire has started, several conditions influence its behavior, including fuel topography, weather, drought, and development.

Locally, the WUI is present in the eastern portion of the Planning Area.⁴ Wildlands located within Los Angeles County are directly adjacent to the Blair Hills and Culver Crest neighborhoods within the city. 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 (FHSZs). In 2011, CAL FIRE developed a FHSZ map, which identified the eastern portion of the Planning Area in a Very High FHSZ (VHFHSZ), as shown in **Figure 4.19-1, Wildfire Hazard Severity Zones**. The VHFHSZ area in the Planning Area includes the eastern portion of the Culver Crest neighborhood, the Blair Hills neighborhood, and areas within the IOF. CAL FIRE has made subsequent updates to their FHSZ map, which removed the Blair Hills neighborhood and areas within the IOF. However, based on the recommendation of the CCFD and City staff, Culver City still utilizes the 2011 Cal Fire FHSZ map for wildfire planning efforts.

⁴ Culver City, 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed May 2023.



- | | |
|----------------------|----------------------------------|
| City Limits | Local Responsibility Area |
| Sphere of Influence | Very High Fire Hazard Zone |
| Metro Station | |
| E Line (Expo) | |
| Major Roads | |
| Local Roads | |
| Parks and Open Space | |
| Waterbody | |

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SOURCE: City of Culver City, 2021; County of Los Angeles, 2023; CalFire, 2011; ESRI, 2021

Culver City General Plan 2045

Figure 4.19-1
Wildfire Hazard Severity Zones



Emergency Response and Evacuation Plans

As discussed in Section 4.8, *Hazards and Hazardous Materials*, emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information during an emergency. Emergency response plans are maintained at the federal, State, and local levels for all types of disasters, including human-made and natural. It is the responsibility of the government to undertake an ongoing comprehensive approach to emergency management in order to avoid or minimize the effects of hazardous events. Local governments have the primary responsibility for preparedness and response activities. The Los Angeles County Office of Emergency Management (County OEM) maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. The County OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in Los Angeles County. The Planning Area is located within Areas A and H, Los Angeles County, Region 1, Southern Administrative Region of the State Office of Emergency Services.⁵ City staff have been designated to coordinate all State Emergency Management System (SEMS) functions. During the response phase, the Fire Station 1's Emergency Operations Center (EOC) serves as the coordination and communication point, and the access to the Los Angeles County Operational Area.

California Government Code Section 65302(g)(5), adopted through Senate Bill (SB) 99, requires identification of residential developments in hazard areas that do not have at least two emergency evacuation routes. These evacuation routes are included in the five-year update to the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan assesses the community's risks and vulnerabilities to natural hazard events such as earthquakes, flooding, and wildfire.

Evacuation of the Planning Area, if necessary because of an emergency, would be conducted by the City's Public Works Department, Los Angeles County Sheriff's Department (LACSD), and Los Angeles County Fire Department (LACFD) in accordance with the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Pursuant to regulatory requirements, the MJHMP is being updated concurrently with the General Plan 2045. In the event that an emergency occurs, evacuation routes have been identified that lead to gateway exit points located at the City boundary. The designated evacuation routes throughout the city are depicted in **Figure 4.8-2, Primary Evacuation Routes**. Additional evacuation routes include those streets that lead to evacuation centers within the City. Three evacuation reception centers have been identified in the City's Disaster Preparedness Guide, including the Culver City Senior Center, Veterans Memorial Building and Culver City Teen Center. Through coordination with the City's Public Works Department, LACSD, and LACFD, three representative emergency scenarios have been identified which would require an evacuation of populations within select evacuation zones within the City. Three

⁵ Emergency Network Los Angeles, 2023. Disaster Management Areas, Cities, and Unincorporated Areas. <https://enla.org/map/>. Accessed May 2023.

emergency scenarios studied in an Evacuation Study include a potential wildfire hazard scenario, a dam inundation scenario, and a flood inundation scenario.⁶

Interstates 10 (I-10) and 405 (I-405), Venice Boulevard, Lincoln Boulevard, Jefferson Boulevard, and Sepulveda Boulevard all serve as potential evacuation routes, along with other roadways as needed. Information about emergency evacuation routes is shown in the maps contained in the MJHMP. These maps identify areas and communities with only one access route, particularly in residential areas, and distances to destinations for three evacuation scenarios.

4.19.3 Regulatory Framework

This section provides the relevant federal, State, regional, and local regulations applicable to the Project.

Federal

National Fire Protection Association

The National Fire Protection Association (NFPA) is a non-profit organization with a mission to eliminate death, economic loss, and property damage from fire, electrical and associated hazards. The NFPA design, building and installation criteria includes 300 codes and standards which aim to minimize the risk of fire incidents.

NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, establishes a recommended response time for dispatched incidents. NFPA recommends that fire departments respond to emergency calls within six minutes of receiving the call, 90 percent of the time.

State

California Department of Forestry and Fire Protection Threat Potential Mapping

CAL FIRE has mapped fire threat potential throughout California, based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, Moderate, High, and Very High fire threat. CAL FIRE produced a 2010 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments. CAL FIRE's Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code (CFC) as well as overseeing hazardous liquid pipeline safety.

California Health and Safety Code (Section 13000 et seq.)

Section 13000 et seq. of the California Health and Safety Code outlines state fire regulations such as building standards, fire notification systems, fire protection devices (extinguishers and smoke alarms), high-rise building standards, and childcare facilities standards. The State Fire

⁶ Culver City and Culver City Unified School District, 2023. Evacuation Route Capacity and Viability Study.

Marshall is responsible for enforcing the regulations and standards outlined in Section 13000 et seq. of the California Health and Safety Code.

Emergency Services Act

Under the Emergency Services Act, Government Code Section 8550, et seq., the State developed an emergency response plan to coordinate emergency services provided by federal, State, and local agencies. Rapid response to incidents involving wildfire and other natural and/or human-caused incidents is an important part of the plan, which is administered by the Governor’s Office of Emergency Services (OES). The office coordinates the responses of other agencies, including the California Environmental Protection Agency (Cal/EPA), California Highway Patrol (CHP), regional water quality control boards, air quality management districts, and county disaster response offices.

California Fire Code

The 2022 CFC, written by the California Building Standards Commission, is based on the 2021 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The CFC, Chapter 9 of Title 24 of the California Code of Regulations (CCR), was created by the California Building Standards Commission based on the IFC and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the WUI and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

California Public Resources Code

Fire Hazards Severity Zones – Public Resources Code Sections 4201–4204

California Public Resources Code (PRC) Sections 4201 through 4204 require CAL FIRE to prepare FHSZ maps for all lands within State Responsibility Areas (SRAs), and to make recommendations for such zones in LRAs. Each zone is to embrace relatively homogeneous lands and is to be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified as a major cause of wildfire spread. CAL FIRE adopted a FHSZ map for Culver City in 2011.

California Building Code

In January of 2008, California officially switched from the Uniform Building Code to the International Building Code (IBC). The IBC specifies construction standards to be used in urban interface and wildland areas where there is an elevated threat of fire.

Assembly Bill 747

Assembly Bill (AB) 747 was adopted in 2019 and requires safety elements to be reviewed and updated as necessary to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. The law authorizes a city or county that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives to use that information in their Safety Element to comply with this requirement by summarizing and incorporating by reference that other plan or document in their Safety Element.

Senate Bill 99

SB 99 was adopted in 2019, and requires a city or county, upon the next revision of their Housing Element on or after January 1, 2020, to review and update the Safety Element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes.

Senate Bill 901

SB 901 mandates all electric utilities to prepare and submit wildfire mitigation plans that describe the utilities' plan to prevent, combat, and respond to wildfires affecting their service territories. The California Public Utilities Commission (CPUC) will review and refine the plans before implementing and enforcing them.

Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7 Division 2 of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated very high fire hazard, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Section 4290–91, (2) structural fire protection services will be available for the subdivision through a publicly funded entity, and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290. The Occupational Safety and Health Act (29 Code of Federal Regulations [CFR] Parts 70 to 2400), which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 CFR Section 1910 et seq., are designed to promote worker safety, worker training, and a worker's right-to-know. In California, OSHA has delegated the authority to administer OSHA regulations to the State of California.

Regional

2022 Los Angeles County Fire Department Strategic Fire Plan

Los Angeles County is one of six contract counties that have executed a contract with the State of California to provide wildland fire protection on SRAs. The LACFD has the responsibility as

part of a contract county to implement the State Strategic Fire Plan, and functionally operates as a unit of CAL FIRE and is responsible for Strategic Fire Plan activities in Los Angeles County. The 2022 LACFD Strategic Plan includes three goals: emergency operations, public service, and organizational effectiveness. The 2022 LACFD Strategic Fire Plan includes goals for LACFD related to analyzing the threat of wildfire to communities in the WUI; implementing fuel reduction projects; developing battalion specific asset maps, strategies, and tactics; and identifying fire prevention strategies that are consistent with LA County's land use planning strategies. LACFD also includes goals to support local Fire Safe Councils and to work with communities to develop community wildfire protection plans.⁷

Los Angeles County Fire Department Programs

LACFD has adopted the CFC for regulations and standards that are applied to new development in hazardous fire areas. These standards and requirements include the provision of access roads, adequate road widths, all-weather access, fire flow requirements, fire hydrant spacing, and vegetation clearance. Los Angeles County Fire Code (LACFC) Sections 325.2.1.2, 328,10, 11117.2.1, and 4908.1 require that projects in areas located in VHFHSZs complete and seek approval of a land development plan and a fuel modification plan. The Los Angeles County Code also includes restrictions, permit requirements, and requirements for fire suppression equipment for activities and housing in fire-prone areas. The LACFC includes provisions for the use and storage of hazardous, flammable, and combustible material. It also includes fire safety requirements for construction and demolition, construction requirements for buildings, as well as requirements for land uses such as energy systems and biomass facilities.

LACFD has instituted a variety of programs to reduce wildfire-related threats. These relate to pre-fire management and defensible space planning, vegetation management (focusing on the use of prescribed fire; hand crews; and mechanical, biological, and chemical means to address wildland fire fuel hazards in SRAs and LRAs) and brush clearance,^{8,9} as well as fuel modification.¹⁰ In addition to these programs, LACFD and the Los Angeles County Department of Public Works enforce fire and building codes related to development in FHSZs.

Los Angeles County Operational Area Emergency Response Plan

The County of Los Angeles developed the Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations

⁷ Los Angeles County Fire Department, 2022. 2022 Strategic Fire Plan. <https://osfm.fire.ca.gov/media/ugwfw535/2022-los-angeles-county-unit-fire-plan.pdf>. Accessed May 2023.

⁸ Los Angeles County Chief Executive Office, 2020. 2020 County of Los Angeles All-Hazards Mitigation Plan. <https://ceo.lacounty.gov/wp-content/uploads/2022/04/County-of-Los-Angeles-All-Hazards-Mitigation-Plan-APPROVED-05-2020.pdf>. Accessed May 2023.

⁹ Los Angeles County Fire Department, 2023a. Fire Hazard Reduction Programs. <https://fire.lacounty.gov/fire-hazard-reduction-programs/>. Accessed May 2023.

¹⁰ Los Angeles County Fire Department, 2023b. Forestry Fuel Modification. Available online at: <https://fire.lacounty.gov/forestry-fuel-modification/>. Accessed May 2023.

associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the ERP is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a SEMS, mutual aid, and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

Los Angeles County All-Hazards Mitigation Plan

Los Angeles County's All-Hazards Mitigation Plan was adopted in May 2020.¹¹ The plan includes risk assessments and hazard mitigation strategies for a variety of hazards including wildfire. It describes the fireproof coating of and provision of auxiliary power for critical assets; Los Angeles County's brush program, vegetation management program, and education and awareness programs to mitigate wildfire hazard risks; the Wildland Urban-Interface Ordinance as a codification of development standards to guide development in WUI areas; and various community wildfire protection plans to identify strategic sites and methods for fuel reduction projects across the landscape.

Local

Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan

Culver City and Culver City Unified School District (CCUSD) received a grant to prepare a MJHMP. The MJHMP presents a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The plan assesses the community's risks and vulnerabilities to natural hazard events such as earthquakes, flooding, and wildfire. The MJHMP includes a set of goals related to the overall goal of hazard mitigation planning and mitigation measures that will serve to advance the plan goals. The MJHMP was approved by the California Governor's Office of Emergency Services (Cal OES) and the Federal Emergency Management Agency (FEMA) on June 1, 2017.

Culver City Municipal Code

Chapter 9.02, Fire Prevention, of the Culver City Municipal Code (CCMC) contains the City's Fire Code, which incorporates by reference the IFC and CFC, with City amendments for additional requirements. The CCFD is responsible for implementing the City's Fire Code as well as reviewing and approving building plans and permits to ensure compliance with applicable fire safety measures prior to the issuance of building permits.

¹¹ Los Angeles County Chief Executive Office, 2020. 2020 County of Los Angeles All-Hazards Mitigation Plan. <https://ceo.lacounty.gov/wp-content/uploads/2022/04/County-of-Los-Angeles-All-Hazards-Mitigation-Plan-APPROVED-05-2020.pdf>. Accessed May 2023.

Culver City Fire Code

CCFD administers, enforces, and inspects applicable standards of the Fire Code, Title 19, Uniform Building Code, Culver City, and national codes concerning new construction and remodeling. CCFD provides emergency services within Culver City, including for fire incidents. CCFD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters, and significant events.

4.19.4 Project Impact Analysis

Thresholds of Significance and Methodology

Thresholds of Significance

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

- Threshold WF-1:** Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Threshold WF-2:** 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.
- Threshold WF-3:** 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.
- Threshold WF-4:** 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.

Methodology

This evaluation focuses on whether implementation of the Project would result in changes to the physical environment that would cause or exacerbate adverse effects related to wildfires or whether future development allowed under the Project would be placed in a location susceptible to wildfire or post-wildfire conditions. The evaluation also includes a determination of whether changes to the physical environment caused by the Project would impair or interfere with emergency response plans, expose people to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire, expose people/structures to downslope flooding or landslides, or include installation or maintenance of infrastructure that may exacerbate fire risk. The following analysis is based, in part, on information provided in the Environmental Background Report Existing Conditions Report and CAL FIRE website.

The potential for impacts related to wildfire was assessed by considering future development under the Project that could be constructed in fire hazard severity zones. Because future

development could be located in or near SRAs or lands classified as very high hazard severity zones, all potential wildfire impacts are analyzed below.

Project Impacts Analysis

Emergency Response or Evacuation Plans

Threshold WF-1: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Statement WF-1: The Project would not substantially impair an adopted emergency response or evacuation plan as development facilitated under the Project would be required to comply with all applicable regulations, plans, and policies related to emergency response plan or emergency evacuation plan. Therefore, the Project would result in a less than significant impact related to emergency response or evacuation plans.

General Plan 2045

As discussed in Section 4.8, *Hazards and Hazardous Materials*, the continued growth and development associated with implementation of the General Plan 2045 could have the potential to interfere with an adopted emergency response or evacuation plan if the emergency response services and/or evacuation routes were to become overburdened by the increase in residents or intensity of new development associated with implementation of the General Plan 2045.

As Culver City is largely built out, development anticipated as a result of implementation of the General Plan 2045 would primarily occur as redevelopment within the urbanized areas of the city which are already served by the local and regional transportation systems and have been accounted for in local and regional emergency response and evacuation plans. Through the City's emergency response and evacuation planning efforts, evacuation routes in the city have been designed to accommodate future development through the Project's horizon year (2045). In the event of an evacuation, major freeways including I-10 and I-405 would be used as the main evacuation routes outside of the city. If access to these major freeways is not available, the City has identified alternative emergency evacuation routes, which include Venice Boulevard, Lincoln Boulevard, Jefferson Boulevard, and Sepulveda Boulevard. Evacuation routes as well as important emergency information would be communicated to residents and employers via Everbridge, the City's Official Emergency Mass Notification System.

In addition to the City's emergency response systems, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. The goals of this plan are to outline a strategy to prepare for, respond to, and recover from an emergency or disaster for 88 cities, 137 unincorporated communities and 288 special districts in the county, including Culver City. The City's MJHMP also provides a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire.

In addition to the local and regional emergency response and evacuation plans, the General Plan 2045 also includes goals and policies, listed below, that aim to continually strengthen emergency response and evacuation services and systems within the Planning Area. Such goals and policies aim to continue updating emergency-related planning documents (including the MJHMP) every five years to ensure consistency with State and federal law, best practices, local conditions, and the most recent science; continue incorporating hazards and mitigation measures identified in the MJHMP into City emergency planning, capital projects, and programs; continue developing and maintaining an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations. The Project also includes policies pertaining to evacuation route planning (Policy S-1.3 and Policy S-7.14) and emergency alert systems (Policy S-3.5). Therefore, implementation of the General Plan 2045 would not overburden the existing local or regional transportation system, which in turn would interfere with an adopted emergency or evacuation plan.

Future development proposed within the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, would be within land designated as a VHFHSZ. However, future development would primarily occur on parcels that already contain existing development. Relevant General Plan 2045 policies include continuing to enforce the CFC and Municipal Fire Code Amendments for new construction in fire hazard areas, including the use of sprinklers in residential structures (Goal S-7 and Policy S-7.1); developing stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential (Policy S-7.10); continuing to update emergency-related planning documents (including the MJHMP) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science; continuing to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations (Policies S-1.3 and S-1.7); and requiring all development proposals to identify existing evacuation routes or establish new evacuation routes as needed (Policy S-7.14).

Furthermore, all development associated with implementation of the General Plan 2045 would be required to demonstrate compliance with applicable building and fire codes and regulations, including the CCMC, CFC, and IFC. Applicable requirements include but are limited to providing multiple points for access for certain types of development, minimum street widths, and maximum acceptable grades for new roads to allow for emergency access for fire apparatuses. Chapter 9.02 of the CCMC requires development to demonstrate compliance with applicable fire safety measures prior to the issuance of building permits. As such, new development associated with implementation of the General Plan 2045 would be reviewed and approved by CCFD for compliance with applicable Fire Code requirements that pertain to emergency access during the development review process. In addition, development would also be reviewed for consistency with the proposed policies and actions of the General Plan 2045, which would further enhance emergency response and evacuation systems and services. By involving CCFD in the development review process, the City would ensure that development is designed to allow for adequate emergency vehicle access and would operate in a manner that minimizes fire hazards and is prepared for emergencies.

Therefore, compliance with local and regional emergency response, evacuation plans, building regulations and requirements established in the CMCC, as well as consistency with applicable General Plan policies would ensure that the Project would not impede with an adopted emergency or evacuation plan. Thus, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented in the development that would occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not impair an adopted emergency response or evacuation plan. Furthermore, applications would be reviewed by the City for compliance with applicable regulations, including the City's Zoning Code Update and consistency with the policies of the General Plan 2045, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not impair an adopted emergency response or evacuation plan, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-1: Community resilience. The City proactively advances community resilience and is prepared for all hazards, including climate disruption.

S-1.1: Emergency-related planning documents. Continue to update emergency-related planning documents (including the Multi-Jurisdictional Hazard Mitigation Plan) every five years to ensure consistency with State and federal law, best practices, local conditions, and recent science.

S-1.2: Multi-Jurisdictional Hazard Mitigation Plan. Continue to incorporate the hazards and mitigation measures identified in the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) into City emergency planning, capital projects, and programs.

S-1.3: Evaluation plan. Continue to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations.

S-1.7: Hazard risk evaluation. Regularly evaluate, identify and communicate new hazard risks and incorporate them into planning and programs.

Goal S-3: Community engagement. A community that is educated about and engaged in efforts related to reducing hazardous risks and climate change.

S-3.5: Emergency alert systems. Continue to use emergency alert systems, like Everbridge, and coordinate with CCARES and CERT members to notify community members when there is an imminent threat or a need to evacuate.

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.1: California Building Code and California Fire Code. Continue to adopt and enforce the most up-to-date California Building Code and California Fire Code, with local amendments as appropriate.

S-7.10: Fire-safe landscapes. Encourage residents to plant and maintain drought-tolerant, fire-retardant landscape species on slopes to reduce the risk of brush fire and soil erosion in areas adjacent to canyons. Develop stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential.

S-7.14: Evacuation routes. Require all development proposals to identify evacuation routes or establish new evacuation routes as needed.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to emergency response and evacuation plans.

Exacerbate Wildfire Risks

Threshold WF-2: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose residents and occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.

Impact Statement WF-2: Future development that would occur as a result of the Project would be required to comply with applicable regulations, plans, and policies in place to reduce the risks associated with wildland fires. Therefore, the Project would result in a less than significant impact related to exacerbating wildfire risks.

General Plan 2045

As discussed in Chapter 2, *Project Description*, development associated with implementation of the General Plan 2045 would primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. If a fire were to occur in the more flat and urbanized areas of the Planning Area, the risk of the fire spreading rapidly would be less than in areas with steeper slopes. As shown in Figure 4.19-1, while the majority of the Planning Area is not located within a FHSZ, the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, is designated as a VHFHSZ and is adjacent to land designated as a VHFHSZ. Therefore, since the eastern portion of the Planning Area contains slopes and/or steep topography, future development or improvements allowed under the General Plan 2045 within the eastern portion of the Planning Area could expose people or structures to wildfire spread. In addition, smoke from wildfires occurring in Los Angeles County and across the state have resulted in poor air quality within Culver City.¹² Future development under the Project could exacerbate wildfire risks such that residents and occupants could be exposed to pollutant concentrations associated with smoke from a wildfire or the uncontrolled spread of wildfire.

¹² Culver City, 2017. City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan. <https://www.culvercity.org/Services/Public-Safety/Hazard-Mitigation-Plan>. Accessed July 2023.

Future development allowed under the General Plan 2045 would be required to comply with all applicable Culver City and CCFD regulations as well as Los Angeles County and LACFD regulations (within the SOI), plans, and policies in place to reduce the risks associated with wildland fires. These regulations, plans, and policies would reduce the potential for exposure to wildland fires through preventive and proactive measures to reduce fuel load (Goal S-7), maintain robust communications (Goal S-3, Policy S-3.4), ensure access to evacuation routes (Policy S-7.14), and ensure that future development projects meet fire protection and emergency access requirements. Compliance with the applicable regulations, plans, and policies would help to reduce the potential for wildfires to start, mitigate the spread of wildfire, and aid in safely evacuating persons affected by wildfires which would reduce the amount of people's exposure to smoke and air pollution.

The General Plan 2045 includes goals and policies that would strengthen the City's emergency services and systems, minimize the risks and hazards of wildfire, and minimize slope instability (Goal S-5, Policy S-5.2). The Safety Element includes various goals and policies that address wildfire risks by focusing on continuing to incorporate and implement the CBC and CFC (Goal S-7, Policy S-7.1), increase fire awareness and cooperative fire protection and prevention services (Policies S-1.3 and S-1.7), promote fire-safe landscaping (Policy S-7.10), and avoid approving new development in areas susceptible to wildfire risks (Policy S-7.9). In addition, Policy S-7.9 of the Safety Element requires construction methods established in the CFC for areas within fire hazard severity zones to minimize wildfire exposure, hazardous vegetation and fuel management, as well as requires the creation of defensible space around all buildings and structures. Further, the General Plan 2045 identifies policies to protect the Blair Hills and Culver Crest neighborhoods from effects of geologic hazards associated with unstable slopes. Policies pertaining to site stability (Policy S-5.2), building safety (Policy S-5.3), and geologic hazard management (Policy S-5.4 and Policy S-5.5) include compliance with standard City requirements, the Hillside Grading and Permitting Ordinance, the California Building Standards Code, and other regulations to reduce wildfire risks due to slope, and thereby expose residents and occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.

Furthermore, the City would review and approve development facilitated under the General Plan 2045 on a project-by-project basis, where site conditions would be evaluated for their potential to exacerbate wildfire risks. For parcels located in the VHFSZ that have steep topography or slopes, all development would be required to comply with the CCMC, which includes various requirements for properties that contain slopes of 15 percent or more, including but not limited to preparation of a site-specific Slope Protection and Fire Prevention Landscape Plan and geotechnical and geologic report with detailed topographic survey, incorporation of slope stabilization measures approved by the Culver City Building and Safety Division, and submittal of a hillside grading plan to obtain a grading permit for sloped areas reviewed and issued by the Culver City Building and Safety Division.

Therefore, compliance with the CBC, CFC, and CCMC, the goal and consistency with policies of the General Plan 2045, and site-specific recommendations identified prior to project approval would ensure impacts related to exacerbating wildfire risks would be considered less than significant. As a result, the degree of wildland fire hazard would not substantially change with

implementation of the General Plan 2045, and thereby expose residents and occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, impacts related to exacerbating wildfire risks would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, or other factors. Furthermore, the City would review development applications for compliance with applicable regulations, the mitigation measures referenced in other sections of this Draft PEIR, and consistency with policies of the General Plan 2045, the City's Zoning Code Update, and. Therefore, future development under the Project would not expose residents and occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-1: Community resilience. The City proactively advances community resilience and is prepared for all hazards, including climate disruption.

S-1.3: Evaluation plan. Continue to develop and maintain an evacuation plan for the City to effectively communicate protocols to residents, distribute evacuation notices, and ensure that all transportation modes can effectively execute their evacuations.

S-1.7: Hazard risk evaluation. Regularly evaluate, identify and communicate new hazard risks and incorporate them into planning and programs.

Goal S-3: Community engagement. A community that is educated about and engaged in efforts related to reducing hazardous risks and climate change.

S-3.4: Emergency communication policy. Maintain the City's emergency communication policy and protocols and use City websites, media resources, emergency alert notification systems, social media, and program advertising to provide information and communicate with the community before, during, or after events that threaten community health, safety, and welfare.

Goal S-5: Geologic Hazards. The Blair Hills and Culver Crest neighborhoods are protected from the social and economic effects of geologic hazards associated with unstable slopes.

S-5.2: Site stability. Continue to require the following, when determined necessary, through standards City requirements, the Hillside Grading and Permitting Ordinance, the California Environmental Quality Act (CEQA), and other regulations.

- Preliminary geotechnical and geologic investigations in areas with high landslide potential;
- Evaluation of site stability and possible impact on adjacent properties, before final project design is approved, and

- Preparation of reports, investigations, and design recommendations for grading permits, building permits, and subdivision applications by a State-geotechnical engineer and State-certified engineering geologist.

S-5.3: Building safety. Continue to require the following, when determined necessary through City requirements, CEQA, and other regulations:

- Meeting the California Building Standards Code and Hillside Grading and Permitting Ordinance adopted by Culver City, coordinating between the project civil engineer, engineering geologists, and geotechnical engineer during grading and construction operations; and
- Certifying that building sites are stabilized to potential adverse effects of rain, earthquakes, and differential settlement before issuing building permits.

S-5.4: Geotechnical site investigations. Require geotechnical site investigations before permitting reuse or rebuilding of a failed area, adjacent unstable slopes, or debris flow path. Establish standards to improve setbacks or surface/subsurface drainage, construct buttresses or other retaining structures, or reconstruct slopes, that will minimize future risk to persons and property or public liability.

S-5.5: Geologic hazard management. Whenever possible, mitigate geologic hazards in a manner that preserves the aesthetic or natural conditions of hillside areas through minimal grading, or corrective landform grading and revegetation with appropriate plant materials. When these goals conflict, protecting life and property shall take precedence.

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.1: California Building Code and California Fire Code. Continue to adopt and enforce the most up-to-date California Building Code and California Fire Code, with local amendments as appropriate.

S-7.4: Fire prevention code enforcement. Develop design standards and strengthen performance review and code enforcement programs to ensure proposed development incorporates fire prevention features.

S-7.5: Comply with minimum standards for fire safety. Require new development to meet the State's minimum standards for fire safety unless the City's Municipal Code defines more conservative standards. These standards include:

- Adequate road widths to accommodate emergency vehicles and developments; and
- Enforcing Municipal Code provisions that require automatic fire extinguishing systems and other fire safety standards.

S-7.7: Building Code and Fire Code provisions. Enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions. Require additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate. This shall include assurance that structural and nonstructural architectural elements of the building are designed not to:

- Impede emergency egress for fire safety personnel, equipment, and apparatuses; and
- Hinder evacuation from fire, including potential blockage of stairways or fire doors.

S-7.9: Wildfire risk. If warranted, avoid approving new development in areas subject to wildfire risk. Enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions to reduce wildfire risk. For areas within fire hazard severity zones, the California Fire Code requires construction methods intended to mitigate wildfire exposure, hazardous vegetation and fuel management, and create defensible space around all buildings and structures.

S-7.10: Fire-safe landscapes. Encourage residents to plant and maintain drought-tolerant, fire-retardant landscape species on slopes to reduce the risk of brush fire and soil erosion in areas adjacent to canyons. Develop stringent site design and maintenance standards for areas with high fire hazard or soil erosion potential.

S-7.14: Evacuation routes. Require all development proposals to identify evacuation routes or establish new evacuation routes as needed.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to exacerbating wildfire risks.

Installation or Maintenance of Associated Infrastructure Which Exacerbate Fire Risk

Threshold WF-3: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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.

Impact Statement WF-3: Future development allowed under the Project would occur in urbanized and developed areas where existing infrastructure is already in place. In addition, future development allowed under the Project would be reviewed by CCFD as part of the development review process to ensure project compliance with CFC, CBC, and the General Plan and Zoning Code Updates. Therefore, the Project would result in a less than significant impact related to the installation or maintenance of associated infrastructure that could exacerbate fire risk.

General Plan 2045

As discussed above, future development associated with implementation of the General Plan 2045 would primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. As shown in Figure 4.19-1, while the majority of the Planning Area is not located within a FHSZ, the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, is designated as a VHFHSZ and is adjacent to land designated as a VHFHSZ outside of the Planning Area.

The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the General Plan 2045, including private and public improvements throughout the city, would generally occur in urban and developed areas that contain existing defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. As discussed in Impact UTIL-1, while implementation of the General Plan 2045 would not require or result in the relocation or construction of new or expanded water, wastewater treatment, and stormwater drainage facilities, it could require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities. However, the construction or relocation of these facilities would be subject to environmental review under CEQA and required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. In addition, development allowed under the General Plan 2045 would occur in urbanized and developed areas where existing infrastructure, including highways and roadways, is already in place. The existing roadway patterns would be retained. While some modifications would occur to accommodate alternate modes of transportation, no new roadways are proposed.

The General Plan 2045 includes goals and policies that would minimize the risks and hazards of wildfire associated with the installation or maintenance of infrastructure associated with future development under the Project. Policies include requirements to adopt and enforce the most up-to-date California Building Code and California Fire Code (Policy S-7.1); develop design standards and strengthen performance review and code enforcement programs to ensure proposed development incorporates fire prevention features (Policy S-7.4); require new development to meet the State's minimum standards for fire safety unless the City's Municipal Code defines more conservative standards (Policy S.7.5); enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions (Policy S-7.7); and if warranted, avoid approving new development in areas subject to wildfire risk (Policy S-7.9).

The City would review future development applications for compliance with the relevant policies in the General Plan 2045. Furthermore, CCFD or LACFD would review the development plans for any City utilities or fire prevention and protection equipment, such as the installation and maintenance of fire access roadways, access walkways to and around buildings, and hydrant quantity and placement, to ensure compliance with the CFC and CBC. As discussed under Impact WF-2, compliance with CFC, CBC, and consistency with General Plan 2045 policies, as well as review of all new structures and private and public improvements by CCFD, would ensure that fire risks are not exacerbated. Therefore, the Project does not propose the installation or

maintenance of any new infrastructure that would substantially exacerbate fire risk, and impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. In addition, the City would review development applications for compliance with applicable regulations, including the Zoning Code Update, and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development under the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Given that the Zoning Code Update would be consistent with the General Plan 2045, the Zoning Code Update would not 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. Thus, impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-7: Fire hazards. Threats to public safety from wildland and urban fire hazards are reduced and property damage minimized.

S-7.1: California Building Code and California Fire Code. Continue to adopt and enforce the most up-to-date California Building Code and California Fire Code, with local amendments as appropriate.

S-7.4: Fire prevention code enforcement. Develop design standards and strengthen performance review and code enforcement programs to ensure proposed development incorporates fire prevention features.

S-7.5: Comply with minimum standards for fire safety. Require new development to meet the State's minimum standards for fire safety unless the City's Municipal Code defines more conservative standards. These standards include:

- Adequate road widths to accommodate emergency vehicles and developments; and
- Enforcing Municipal Code provisions that require automatic fire extinguishing systems and other fire safety standards.

S-7.7: Building Code and Fire Code provisions. Enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions. Require additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate. This shall include assurance that structural and nonstructural architectural elements of the building are designed not to:

- Impede emergency egress for fire safety personnel, equipment, and apparatuses; and
- Hinder evacuation from fire, including potential blockage of stairways or fire doors.

S-7.9: Wildfire risk. If warranted, avoid approving new development in areas subject to wildfire risk. Enforce the standards and guidelines of the City's Building Code and Fire Code fire safety provisions to reduce wildfire risk. For areas within fire hazard severity zones, the California Ride Code requires construction methods intended to mitigate wildfire exposure, hazardous vegetation and fuel management, and create defensible space around all buildings and structures.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to the installation or maintenance of associated infrastructure which exacerbate fire risk.

Expose People or Structures to Significant Risks

Threshold WF-4: The Project would have a significant impact if implementation of the General Plan 2045 and Zoning Code Update would 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.

Impact Statement WF-4: Future development allowed under the Project would be subject to the applicable regulations and requirements of the City's Municipal Code as well as policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that the Project would not 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. Therefore, impacts would be less than significant.

General Plan 2045

As shown in Figure 4.19-1, the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, is designated as a VHFHSZ and is adjacent to land designated as a VHFHSZ outside of the Planning Area. The Blair Hills (located near the Baldwin Hills) and Culver Crest neighborhoods contain sloping hillsides that are susceptible to landslides and flooding after fire has removed protective vegetative cover. These secondary hazards associated with wildfires are described in the City's MJHMP. In a post-fire scenario, wildfires can cause secondary effects such as transmission line and road destruction as well as reservoir contamination. Slopes that have been stripped of vegetation are exposed to greater amounts of erosive runoff, which can weaken soils and cause slope failure. Major landslides can occur several years after a wildfire. Most wildfires burn hot and for long durations, which can bake soils, especially those high in clay content. This increases the ground imperviousness and runoff generated by storm events, thereby increasing the chance of flooding.

Within portions of the Planning Area with a relatively flat topography, the risk of flooding or landslides after a fire would be negligible due to development that reduces the amount of soil

exposed. As described under Impact WF-2, future development or improvements allowed under the General Plan 2045 within the eastern portion of the Planning Area could expose people or structures to wildfire spread. As discussed above, new development would primarily occur on parcels that already contain some existing homes or businesses.

As described in Section 4.6, *Geology and Soils*, and Section 4.9, *Hydrology and Water Quality*, future development allowed under the General Plan 2045 would be required to comply with all applicable requirements related to soil instability and water quality, including the regulations of the CCMC and policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. The General Plan 2045 contains specific policies related to the prevention of flooding, landslides, and drainage changes, including policies that require ensuring prudent development and redevelopment within areas with high landslide potential during environmental and development review processes (Policy S-5.1); sufficiently removing dead, woody vegetation after a catastrophic fire (Policy S-5.6); and studying drainage systems in selected areas at the base of hills (specifically the Blair Hills and Culver Crest neighborhoods) to identify where drainage improvements may be necessary (Policy S-6.8). Combined with the continued implementation of the City's MJHMP, as well as review of development plans by CCFD, these policies provide additional proactive measures to refine and enhance the resiliency of the Planning Area, as well as strengthening the City's review of new applications for development to ensure that the Project would not 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. As such, impacts would be less than significant.

Zoning Code Update

The Zoning Code Update is the mechanism to ensure that the goals and policies in the City's General Plan 2045 are implemented through the development that would occur throughout the city over time. The City would review development applications for compliance with applicable regulations, including the City's Zoning Code Update, and consistency with the policies of the General Plan 2045 and mitigation measures referenced in other sections of this Draft PEIR. Therefore, future development that would occur under the Zoning Code Update would not 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. Impacts would be less than significant.

Applicable Proposed General Plan Goals and Policies

Safety Element

Goal S-5: Geologic Hazards. The Blair Hills and Culver Crest neighborhoods are protected from the social and economic effects of geologic hazards associated with unstable slopes.

S-5.1: Development in areas with high landslide potential. Continue ensuring required compliance with State regulations during development and redevelopment within areas with high landslide potential during environmental and development review process.

S-5.6: Vegetation management. Reduce the potential for landslides by sufficiently removing dead, woody vegetation after a catastrophic fire.

Goal S-6: Flood hazards. The community is resilient to flood and inundation hazards.

S-6.8: Drainage systems at base of hills. Study drainage systems in selected areas at the base of hills (specifically the Blair Hill and Culver City Crest Neighborhoods) to identify where drainage improvements may be necessary.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to exposing people or structures to significant risks.

4.19.5 Cumulative Impacts Analysis

The geographic context for the analysis of potential contributions to cumulative impacts on wildfire consists of the service area of the fire protection providers to the project area. CCFD provides fire protection to the Planning Area. CCFD is supported, when needed, through mutual aid agreements with the fire departments in the City of Los Angeles and Los Angeles County, with further assistance from the cities of Beverly Hills, Santa Monica, and West Hollywood. Areas surrounding the Planning Area are also within a Very High Fire Hazard Severity Zone.

Construction of two or more projects that occur at the same time and use the same roads could interfere with an adopted emergency response plan or emergency evacuation plan. As discussed previously under WF-1, the City and adjacent jurisdictions have standard requirements in place to address potential impacts to emergency evacuation routes and traffic flow in general during construction. As with projects that would occur from implementation of the General Plan 2045, cumulative projects would be assessed by local fire departments for compliance with applicable CFC requirements that pertain to emergency access to maintain traffic flow and prevent interference with emergency access. As such, as with the Project, any cumulative projects would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Therefore, the Project would not contribute to a cumulatively significant impact regarding emergency response and evacuation, and the cumulative impact would be less than significant.

For cumulative projects that are within a VHFHSZ adjacent to the eastern boundary of the Planning Area in the City of Los Angeles and unincorporated areas of Los Angeles County, the development of housing or businesses could increase the risk of wildfire by introducing new sources of ignition (i.e., vehicles and residents) into those areas. However, as a condition of approval, and pursuant to the Fire Code of the jurisdictions, all development would be required to comply with requirements relating to emergency planning and preparedness, emergency access, water supply, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. In addition, the inclusion of fire service features, building services and systems, fire and smoke protection features, building materials, and construction requirements would reduce impacts associated with development. Further, cumulative projects in surrounding jurisdictions would be required to comply with the

CBC, CFC, and local municipal codes which would reduce impacts associated with wildfires. The implementation of these standard requirements would reduce impacts associated with accidental ignitions emanating from project sites and would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose residents and occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, there would be no cumulatively considerable effect, and the cumulative impact would be less than significant.

Similar to the Planning Area, the surrounding city of Los Angeles and unincorporated areas of Los Angeles County are largely urbanized, generally outside the SRA and VHFHSZs and include roads and other fuel breaks, emergency water sources, emergency utilities and maintenance of other infrastructure that would reduce impacts from wildfires. However, some areas adjacent to the eastern boundary of the Planning Area are within a VHFHSZ, as noted above. All cumulative projects, including the installation and/or maintenance of associated infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities, would be subject to jurisdiction-specific fire protection development standards and be required to comply with City of Los Angeles and Los Angeles County ordinances. Plan review by the local fire department to assist in protecting life and property in the event of a wildfire would also be required prior to approval of future development. Therefore, there would be no cumulatively considerable effect, and the cumulative impact would be less than significant.

Similar to the Planning Area, the surrounding city of Los Angeles and unincorporated areas of Los Angeles County are generally flat, largely urbanized and developed. However, some portions of the surrounding city and county contain steep, undeveloped areas. Post-fire impacts such as slope instability and downstream flooding are more typically associated with steep wildland areas that burn and then erode or slide onto downslope area.

If cumulative projects were to be developed in areas adjacent to steep wildland areas where wildfire could occur, those sloped areas could potentially erode onto the developed areas and create adverse effects. However, any development proposed in these areas would be subject to engineering and permit review as part of the jurisdiction's approval process. Potential constraints associated with upslope areas or other factors would be evaluated at the time of application and appropriate design standards implemented prior to issuance of building permits. Therefore, the Project would not contribute to a cumulatively significant impact regarding exposing 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, and the cumulative impact would be less than significant.

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CHAPTER 5

Alternatives

5.1 Introduction

This chapter of the PEIR evaluates alternatives to the General Plan 2045 and Zoning Code Update (Project) and analyzes the comparative environmental impacts associated with each alternative. Under CEQA, and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly” (Section 15126.6(b)). The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed (Section 15126.6(f)).

In selecting project alternatives for analysis, potential alternatives should be feasible. CEQA Guidelines Section 15126.6(f)(1) explains that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The CEQA Guidelines require the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the

environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)).

CEQA Guidelines Section 15126.6(d) states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

5.2 Project Objectives

As indicated in Chapter 2, *Project Description*, of this PEIR, the underlying purpose of the Project is to comprehensively update the General Plan to establish a long-range vision that reflects the unique needs of the city and provides clear direction to improve the quality of life for residents, businesses, and visitors. In addition, the purpose of the Project, which includes updates to portions of the City’s Municipal Code, is also to provide the amendments necessary to the Zoning Code to implement the General Plan 2045. Core values include equity and inclusion; sustainability; innovation and creativity; and compassion and community. At the outset of the General Plan Update process, the following Guiding Principles were developed, which are specific and objective benchmarks that guided the development of the General Plan 2045:

- Provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures;
- Advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations, including persons experiencing homelessness, the elderly, and persons with disabilities;
- Create more opportunities to broaden and deepen civic engagement that bring more of Culver City’s diverse voices to the decision-making table;
- Adopt innovative and equitable policies to eliminate greenhouse gas emissions (decarbonize buildings and industry), reduce energy and water use, encourage the purchase of 100 percent renewable, carbon-free electricity, foster the transition to zero-emission vehicles, and adapt to climate disruption, ensuring all residents, are resilient to climate hazards;
- Foster harmony between people and the environment through continued sustainability efforts, urban ecology, and stewardship of natural resources, like the Ballona Creek and Baldwin Hills, for the benefit of future generations;
- Cultivate social connections between residents, workers, businesses, and visitors through urban design that sustains and revitalizes the public realm, creates great places to gather, adapts to a changing climate, and promotes public safety;

- Be a creative and proactive leader in solving regional, state, and national challenges around issues like housing, mobility, public safety, equity, climate change, and environmental pollution and disruption;
- Elevate community health and health equity through new, improved, and well-maintained public amenities that are accessible to all—like parks, sport courts and fields, gathering places, healthy and affordable food, natural resources, and community services—that allow people of all ages and abilities to thrive physically, socially, and mentally;
- Sustain arts and culture in Culver City, including visual, performing, literary, and culinary arts. Support the continued preservation of historic and cultural resources in Culver City;
- Support the continued growth of creative industries as the cornerstone of the renowned arts and cultural identity and unique regional economic role of Culver City, including digital media, architecture and interior design, and visual and performing arts;
- Practice resilient and sustainable solutions to maintain and improve infrastructure, including water, road infrastructure, and broadband. Ensure these solutions are implemented equitably throughout the city. Embrace innovative and responsible use of technology to improve City operations, enhance public participation, and build smart, secure, and adaptable infrastructure systems;
- Build more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities;
- Support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of industries that provide employment, commercial, and experiential opportunities. Ensure the economy is resilient to shocks and stresses, like pandemics, seismic events, flooding, wildfires and other natural and human made disasters.

5.3 Alternatives Considered and Rejected

As discussed above, CEQA Guidelines Section 15126.6(c) provides that an EIR should identify alternatives that were considered for analysis but were rejected and briefly explain the reasons for their rejection. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of a project, the alternative’s infeasibility, or the alternative’s inability to avoid significant environmental impacts.

Feasibility is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (PRC Section 21061.1). CEQA Guidelines Section 15126.6(f)(1) specifies factors that may be taken into account when addressing the feasibility of alternatives; these factors include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

Finally, alternatives that would neither avoid nor substantially lessen any of the significant unavoidable environmental effects of the project need not be evaluated in an EIR.¹ Such alternatives can therefore be considered infeasible. Due to the nature of the Project being a general plan update, which is specific to the jurisdiction it is prepared for, evaluation of an alternative location alternative is infeasible and therefore, is not included below.

As discussed in Chapter 1, *Introduction*, the City initiated the General Plan 2045 process in 2019 with a series of community outreach events and launch of the project website (pictureculvercity.com). The planning process was guided by a General Plan Advisory Committee (GPAC) and technical advisory committees (TACs) with several meetings of the Planning Commission and the City Council at key stages.

As a result of input received on the key issues and community needs, potential land use approaches for the General Plan 2045 were developed. On June 23, 2021, three land use alternatives were considered in a joint session held with the City Council and Planning Commission to determine the preferred alternative. The three land use alternatives considered represented different land use scenarios that could achieve the City's community vision over the next 25 years.

The three land use alternatives considered different land use and urban design patterns in order to illustrate the trade-offs between policy questions for the General Plan 2045, which helped the City to make informed decisions about how the General Plan 2045 would guide growth into the future. The three land use alternatives were Concentrated Growth, Dispersed Infill, and Dispersed Densification. **Figure 5-1, *Land Use Alternatives Conceptual Comparison***, illustrates the conceptual differences between the three alternatives. Based on input from the City Council and Planning Commission, the Dispersed Infill Alternative was selected as the basis for the Project. The Concentrated Growth Alternative that was developed in the process is evaluated as an alternative in Section 5.5 below.

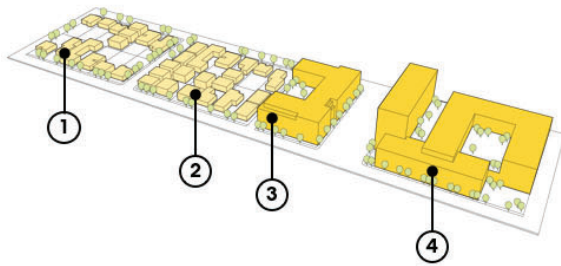
The following is a discussion of the Dispersed Densification Alternative considered during the planning process and the reasons why it was not selected for detailed analysis in this Draft PEIR. The City also considered and rejected a Reduced Buildout Alternative, which is also discussed below.

5.3.1 Dispersed Densification Alternative

The Dispersed Densification Alternative distributes new growth across the city but at higher densities than the Project. Under this alternative, identified opportunity sites would accommodate high-density mixed-use development. The larger mixed-use developments on opportunity sites would activate the street frontage to encourage pedestrian activity. While the focus would be commercial uses, there would also be residential infill. Development along the commercial corridors would be allowed a greater mix and intensity of uses compared to the Project.

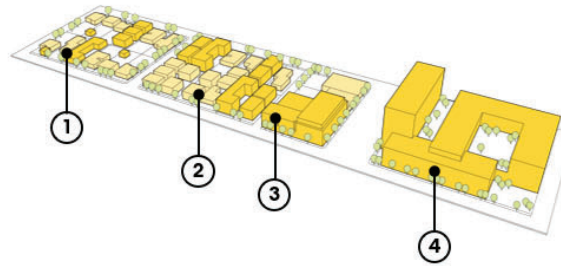
¹ See, e.g., *City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 419.

Concentrated Growth



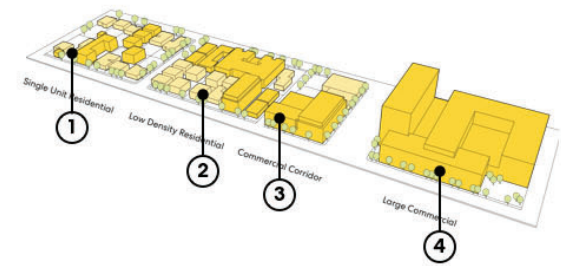
- 1. Maintain single family
- 2. Maintain low density
- 3. Moderate densification
- 4. Activation, commercial focus with significant residential infill

Dispersed Infill Selected as the basis for the Project



- 1. Incremental infill
- 2. Incremental densification
- 3. Incremental densification
- 4. Activation, significant residential growth

Dispersed Densification



- 1. Incremental densification
- 2. Moderate densification
- 3. Incremental densification
- 4. Activation, commercial focus with significant residential infill

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SOURCE: General Plan 2045 Culver City, 2023

Culver City General Plan 2045

Figure 5-1
Land Use Alternatives Conceptual Comparison



In addition, under this alternative, incremental and moderate densification² would occur in the single-family and low-density residential areas. Lot consolidation would be encouraged in existing low and medium density multifamily areas in order to achieve larger lot sizes. In addition, an increase in lot sizes and increase in building heights would be needed to accommodate more dense development. It would be expected that low-density, single-family areas would evolve over time with incremental densification of up to 8 units on a lot. The increase in height and densification would alter the existing character, particularly in the single-family neighborhoods.

The increased residential densities proposed for low- to medium-density residential areas was considered to be too intense for the existing character of these areas. In addition, this alternative was considered to conflict with the Project's objective of guiding future development that would preserve and enhance community character and environmental resources. The increased densities in the low to medium residential areas would be inconsistent with existing development in those areas. Since this alternative would be in conflict with the goal of the City's General Plan to provide a long-range vision for the city which balances growth and development with community needs and desires, the Dispersed Densification alternative is eliminated from further consideration in this PEIR.

5.3.2 Reduced Buildout Alternative

A Reduced Buildout Alternative, whereby residential and non-residential growth would be assumed to occur at reduced intensities and densities compared to the Project was considered. Under a Reduced Buildout Alternative, the changes in land use and zoning designations would not be able to fully accommodate the anticipated growth within the city over the next two decades. The Reduced Buildout Alternative could impact the City's ability to meet future Regional Housing Needs Allocation (RHNA) cycles through 2045, which could result in the City potentially being non-compliant with State housing laws.

In addition, if full buildout was achieved prior to the 2045 horizon year, future requests to process General Plan and zoning amendments on a project-by-project basis might result, leading to land use changes on a parcel-level rather than through a comprehensive, long-term plan. In addition, if separate General Plan and/or zoning amendments were to occur on a project-by-project basis, this could result in a longer planning process for each project since streamlining through this General Plan Update process may not be feasible. Under the Reduced Buildout Alternative, future development may be displaced to surrounding jurisdictions, which are also developed, urban environments.

Overall, a Reduced Buildout Alternative would not fully achieve the Project's objectives, as the City may not be able to accommodate its RHNA allocations through the 2045 planning horizon and would not be able to support the anticipated growth within the Planning Area or the region over the next few decades. Specifically, this alternative would not achieve the following

² "Incremental Densification" is defined as development that would occur incrementally throughout the plan horizon of 2045, with residential areas developing at densities up to six units on a lot, and most development requiring demolition of existing buildings to accommodate new development.

objectives to the same extent as the Project due to its reduced development potential: 1) support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of industries that provide employment, commercial, and experiential opportunities; 2) be a creative and proactive leader in solving regional, state, and national challenges around issues like housing, mobility, public safety, equity, and climate pollution and disruption; and 3) advance continued racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and marginalized populations, including persons experiencing homelessness, the elderly, and persons with disabilities. Therefore, the City eliminated the Reduced Buildout Alternative from further consideration in this PEIR.

5.4 Alternatives Selected for Analysis

As described above, based on CEQA Guidelines Section 15126.6(a) the purpose of analyzing project alternatives is to identify alternatives that "... would avoid or substantially lessen any of the significant effects of the project." According to Section 15126.6(e) an EIR alternatives analysis should include the analysis of a No Project Alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts and foreseeable future of not approving that project.

As indicated in Chapter 4, *Environmental Impact Analysis*, of this PEIR, Project impacts would be less than significant or less than significant with mitigation incorporated for the majority of the environmental topics evaluated. The Project would, however, have significant unavoidable impacts associated with air quality, cultural resources (historical resources), noise, and transportation (VMT). The alternatives evaluated in this chapter have been formulated to reduce the magnitude of the Project's environmental impacts and to inform the decision-making process. The alternatives analyzed in this PEIR include:

- Alternative 1 – No Project Alternative
- Alternative 2 – Concentrated Growth Alternative
- Alternative 3 – Modified Mixed Use High Designation

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. In addition, each alternative is evaluated to determine whether the Project objectives would be substantially attained by the alternative. The evaluation of each of the alternatives includes the following components:

- A description of the alternative.
- An assessment of the impacts of the alternative for each environmental issue area evaluated in the EIR.
- An analysis of how the impacts of the alternative for each environmental issue area compares to the impacts of the Project. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative

impact is said to be “greater.” Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”

- The comparative analysis of the impacts is followed by a general discussion of the extent to which the Project Objectives could be attained by the alternative.

The three alternatives are analyzed and described in more detail below. **Table 5-1, Comparison of Population, Housing Units, and Jobs**, compares key characteristics for the Project and each alternative.

**TABLE 5-1
COMPARISON OF POPULATION, HOUSING UNITS, AND JOBS**

	Project	Alternative 1: No Project^a	Alternative 2: Concentrated Growth	Alternative 3: Modified Mixed Use High Designation
Population	62,400	41,550	59,530	61,170
Housing Units	28,310	18,020	27,200	27,340
Jobs	84,300	64,040	83,200	84,090

^a The No Project Alternative growth projections are based on the socio-economic data (SED) assumptions from the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as presented in Fehr & Peers, Culver City General Plan Update CEQA Transportation Analysis, Table 2.

SOURCES: Culver City, 2022. City Council/Planning Commission Joint Session Memorandum; Fehr & Peers, Transportation Analysis, 2024.

5.5 Impact Analysis of the Alternatives

5.5.1 Alternative 1 – No Project

Description of the Alternative

Consistent with CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative represents what would be reasonably expected to occur in the foreseeable future if the Project were not adopted and the City’s current General Plan and Zoning Code remain in effect. Future development under Alternative 1, the No Project Alternative, would be the continuation of growth in the city guided by the City’s adopted 1996 General Plan and the current Zoning Code.

Under the No Project Alternative, the current land use designations in the adopted General Plan as amended to date and existing goals and policies would remain in place. Future development in the Planning Area would continue to be subject to existing policies, regulations, development standards, and land use designations of the adopted General Plan. No amendments would occur to areas identified for change under the Project. The No Project Alternative is depicted in Figure 2-4, *Existing General Plan Land Use Map*, in Chapter 2, *Project Description*. Policies concerning topics such as transportation, economic development, parks, open space, the environment, climate change, environmental justice, health, and housing would also remain unchanged.

Specifically, since no new land use or zoning designations would be created under this alternative, the City would not comprehensively update its Land Use Element or Land Use Map to increase densities or intensities across the city. Without increasing the residential densities within the city, the City would not be able to fully meet its current and future RHNA allocations through 2045.³ In addition, under this alternative, the City would have to continue to process General Plan and zoning amendments on a project-by-project basis for projects that conflict with the existing 1996 General Plan, which results in land use changes at the parcel level instead of being comprehensively updated through the planning process for the General Plan.

The 1996 General Plan projected approximately 41,330 residents and approximately 56,743 jobs by the planning horizon of 2010.⁴ Since the planning horizon of 2010 has passed, the No Project Alternative growth projections (see Table 5-1) are based on the socio-economic data (SED) assumptions from the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG developed demographic and economic forecasts of population, households, and employment at the regional and county levels and then incorporated local land use data and existing housing and employment data to allocate growth at the jurisdiction (e.g., city) and Transportation Analysis Zone (TAZ) levels. SCAG worked with the individual jurisdictions during this process to ensure accurate projections for each jurisdiction using their current General Plans and land use maps. The SCAG 2045 forecast for Culver City is a population of 41,550 residents with a total of 18,020 households and 64,040 jobs.⁵

Environmental Impacts

Aesthetics

Scenic Vistas

As discussed in Section 4.1, *Aesthetics*, of this Draft PEIR, the Project would not have a substantial adverse effect on a scenic vista, as land use designations under the proposed General Plan 2045 focus development toward portions of the Planning Area that are already developed, and thus would relieve pressure to develop in open space and natural areas. In addition, the Project includes several policies that would regulate scenic quality and resources. For these reasons, this impact would be less than significant. In addition, the Zoning Code Update, which is the implementation mechanism, would provide requirements for future development consistent with the General Plan goals and policies. The Zoning Code Update would provide the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights. As such, the Zoning Code Update would not result in a substantial adverse effect on a scenic vista. Future development would be reviewed by the City for compliance with applicable requirements and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, impacts related to scenic vistas would be less than significant.

³ City of Culver City Housing, October 2021–2029, Appendix B, Table B-5.

⁴ Note that the existing 1996 General Plan does not project households.

⁵ Fehr & Peers, Culver City General Plan Update CEQA Transportation Analysis, Table 2. 2024.

Similar to the Project, development under Alternative 1 would also be directed toward portions of the Planning Area that are already developed and thus would relieve pressure to develop in open space and natural areas. In addition, the existing General Plan includes several policies that also regulate scenic quality and resources. Therefore, under Alternative 1 the impact with respect to scenic vistas would remain less than significant, similar to the Project. However, the severity of this impact would be greater under Alternative 1 since the policies contained in the existing General Plan would not regulate scenic quality and resources to the same degree as the policies contained in the proposed General Plan 2045. Specifically, proposed General Plan 2045 policies address context-specific development standards that provide clear guidance for height limitations and bulk and massing controls for future development (Policy LU-6.1); compatibility standards to maintain smooth transitions in scale, form, and character (Policy LU-13.7); and implementation of the City View Preservation Ordinance (Policy LU-14.3).

Consistency with Applicable Zoning and Regulations Governing Scenic Quality

While the Project would result in an increase in densities and intensities of land uses, the majority of the proposed changes would occur within Culver City, with limited land use changes occurring within the Sphere of Influence (SOI). Proposed policies in the General Plan 2045 are intended to complement and improve the existing scenic quality and resources in the city as well as to implement the City's vision for the future character of the city. The Zoning Code Update would provide specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights consistent with the General Plan 2045. As such, the Zoning Code Update would not conflict with the General Plan 2045 and other regulations governing scenic quality. Therefore, impacts would be less than significant.

Development that would occur under Alternative 1 would also adhere to applicable zoning and other regulations and plans governing scenic quality in urbanized areas, including the General Plan and the Culver City Municipal Code (CCMC). In addition, the existing General Plan includes several policies that regulate scenic quality and resources. Therefore, the impact with respect to consistency with applicable zoning and other regulations governing scenic quality would remain less than significant, similar to the Project. However, Alternative 1 would result in a greater severity of this impact, as policies contained in the existing General Plan would not regulate scenic quality and resources to the same degree as the policies contained in the proposed General Plan 2045. Specifically, the General Plan 2045 includes policies intended to reduce impacts to visual character in and around the Planning Area and promote cohesive and visually appealing development consistent with the character of the city. Proposed policies aim to maintain design standards that provide clear guidance of bulk and massing controls for future development (Policy LU-6.1) and require compliance with location-specific design guidelines (Policy LU-17.8).

Light and Glare

The Planning Area is urban in nature and thus, future development under the Project would primarily occur on parcels that contain uses that currently generate light and/or glare. While future development would include additional lighting and/or materials that could cause glare, the addition of these light and glare sources would be consistent with the existing urban environment and would replace the previous onsite light and glare sources. Therefore, any

increase in ambient nighttime light conditions would not be substantial and would not be out of character with the urban environment. In addition, the General Plan 2045 includes policies related to buffering between uses and avoiding light spill and glare onto residential properties and sensitive habitats. Future development would be required to comply with applicable lighting regulations and standards in the CCMC. Therefore, impacts regarding light and glare that could affect day or nighttime views in the area would be less than significant.

Development allowed under Alternative 1 would also be required to comply with provisions within the CCMC that would limit light and glare from new non-residential and residential development. Therefore, the impact with respect to light and glare would remain less than significant, similar to the Project, although the severity of this impact would be less since less growth would occur under Alternative 1 compared to the Project.

Air Quality

Air Quality Plan

As discussed in Section 4.2, *Air Quality*, of this Draft PEIR, Culver City continues to coordinate with the South Coast Air Quality Management District (SCAQMD) and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of future development under the proposed General Plan and Zoning Code Update would not conflict with or obstruct the implementation of the applicable air quality plan. Nonetheless, the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would be significant. Implementation of Mitigation Measures MM AQ-1 through MM AQ-5 would serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development under the Project. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, impacts would remain significant and unavoidable.

The construction and operation of individual development projects allowed under Alternative 1 would also be required to follow existing state and local rules and regulations to minimize short-term and long-term emissions. In addition, the growth projections contained in Alternative 1 were included in the latest adopted Air Quality Management Plan (AQMP), and thus, as long as future growth in the city is consistent with the existing General Plan, it would not conflict with the applicable air quality plan. Similar to the Project, future development under Alternative 1 would be required to comply with applicable AQMP construction and operational control strategies. Therefore, the impact with respect to a conflict with the applicable air quality plan during construction and operation would be less than significant. Further, since the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City, impacts under Alternative 1 would be less than the Project.

Criteria Pollutants

The Project could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment, as the construction and operation of individual future projects would generate emissions of criteria pollutants that could exceed regional

significance thresholds. Even with the implementation of mitigation measures (MM AQ-1 and MM AQ-5), this impact would be significant and unavoidable.

It is possible that Alternative 1 could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment for the same reason as the Project. However, future development under Alternative 1 would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the Project to reduce construction phase and operational emissions. Therefore, this impact would also remain significant and unavoidable, similar to the Project, although the severity of this impact would be less since less growth would occur under Alternative 1 compared to the Project, resulting in less traffic and VMT, which would result in fewer emissions of criteria pollutants from motor vehicles.

Substantial Pollutant Concentrations

The Project could expose sensitive receptors to substantial pollutant concentrations as the construction and operation of individual future projects would generate emissions of nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter 10 micrometers and smaller (PM₁₀), and particulate matter 2.5 micrometers and smaller (PM_{2.5}) that could exceed localized significance thresholds (LST) established by the SCAQMD. In addition, the construction and operation of individual future projects could expose nearby sensitive receptors to levels of toxic air contaminants that could result in a potential increase in cancer, acute, and/or chronic risk. Even with the implementation of MM AQ-6 and MM AQ-7, this impact would be significant and unavoidable.

Alternative 1 could also expose sensitive receptors to substantial pollutant concentrations during construction and operation for the same reasons as the Project. Future development in the City would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the Project to reduce localized air quality and health risk impacts. However, even with implementation of mitigation measures, impacts could exceed the significance thresholds. Therefore, similar to the Project, this impact would remain significant and unavoidable, although the severity of this impact would be less, as less growth would occur under Alternative 1 compared to the Project.

Biological Resources

Special-Status Species

As discussed in Section 4.3, *Biological Resources*, of this Draft PEIR, the Project could have a substantial adverse effect on special-status plant and wildlife species that occur within the Planning Area. However, with adherence to proposed General Plan policies related to the protection of biological resources; compliance with all applicable laws, regulations, and ordinances related to the protection of special-status plant and wildlife species; and implementation of mitigation measures (MM BIO-1 and MM BIO-2), this impact would be reduced to a less-than-significant level.

Development allowed under Alternative 1 could also have a substantial adverse effect on special-status plant and wildlife species that occur within the Planning Area. As with the Project, development under Alternative 1 would be required to comply with existing regulations related

to the protection of biological resources. Therefore, the impact to special-status plant and wildlife species under Alternative 1 is expected to be reduced to a less-than-significant level, similar to the Project.

Riparian Habitat or Sensitive Natural Habitat

Given the lack of any sensitive natural communities, including lack of riparian habitat, within the Planning Area, the Project would have no effect on these resources. Therefore, the Project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project would have no impact.

Development allowed under Alternative 1 would also not have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS for the same reason as the Project. Therefore, as is the case for the Project, no impact would occur.

State or Federally Protected Wetlands

The Project would not have a substantial adverse effect on state or federally protected wetlands, as there are no wetlands present within the Planning Area. As a result, no impact would occur. In addition, the planned Ballona Creek Revitalization Project would enhance the restoration and use of Ballona Creek. Restoration activities may require Clean Water Act permits from the U.S. Army Corps of Engineers (USACE) and the Los Angeles Regional Water Quality Control Board (RWQCB) and/or a streambed alteration agreement from CDFW, which would be obtained prior to any work, and permit conditions would be implemented. Impacts would be less than significant.

Development allowed under Alternative 1 would also not have a substantial adverse effect on state or federally protected wetlands for the same reason as the Project. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Wildlife Corridors or Wildlife Nursery Sites

There are no wildlife corridors present within the Planning Area. Therefore, the Project would have no effect on wildlife corridors. In addition, nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where implementation of the General Plan 2045 could directly or indirectly impact these biological resources. Compliance with the General Plan 2045 goals and policies, the Zoning Code Update, the Migratory Bird Treaty Act (MBTA), and mitigation measure MM BIO-2 would ensure that impacts to nesting birds would be reduced to less than significant. Based on review of available information, no known non-avian wildlife nursery sites occur within the Planning Area.

As with the Project, development under Alternative 1 would not have a substantial adverse effect on wildlife corridors or non-avian wildlife nursery sites. Therefore, as is the case for the Project, no impact would occur.

Development under Alternative 1 could also have a substantial adverse effect on nesting birds and/or nesting bird habitat that occur within the Planning Area. However, development allowed under the existing General Plan would be required to comply with applicable regulations related to the protection of nesting birds. Therefore, similar to the Project, the impact to nesting birds under Alternative 1 would be reduced to a less-than-significant level.

Conflict with Tree Preservation Policy or Ordinance

Future development facilitated by the Project would be subject to the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. In addition, proposed General Plan 2045 policies would serve to promote a strong urban forest across public and private properties and enhance tree health and appearance of streets and other public spaces through the regular maintenance as well as tree and landscaping planting and care of the existing canopy. Consistency with these policies would further ensure the impacts of the General Plan 2045 to existing and proposed tree resources would be minimized. Therefore, conflicts with local policies or ordinances protecting biological resources would not occur, and impacts would be less than significant.

Development allowed under Alternative 1 would also not conflict with a tree preservation policy or ordinance for the same reason as the Project. Therefore, the impact would be less than significant, similar to the Project.

Cultural Resources

Historic Resources

As discussed in Section 4.4, *Cultural Resources*, of this Draft PEIR, future development under the General Plan 2045 may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. Even with adherence to the existing City Historic Preservation Ordinance, which outlines a designation process, criteria, and procedures for altering or modifying designated cultural resources; proposed General Plan policies related to the protection of cultural resources; and implementation of MM CUL-1, this impact would be significant and unavoidable.

Development allowed under Alternative 1 could also cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. As with the Project, this impact would be significant and unavoidable even with adherence to the existing City Historic Preservation Ordinance, although the severity of this impact would be less, as less growth would occur under Alternative 1, and thus there would be less potential to negatively affect historic resources.

Archaeological Resources

The Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Adherence to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction,

implementation of MM CUL-2, and implementation of applicable policies in the General Plan 2045 would reduce the impact to a less-than-significant level.

Development allowed under Alternative 1 could also cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. As with the Project, adherence to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction would reduce the impact to a less-than-significant level. The severity of this impact would be less than the Project since less growth would occur under Alternative 1. Therefore, the potential to negatively affect archaeological resources would be less under Alternative 1 compared with the Project.

Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Under the Project, energy use for construction of new developments would be for on-site activities and to transport construction materials and demolition debris as needed. In addition, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of new developments that could occur under the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant. With respect to operation, future development would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations. Therefore, future development under the Project would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during operation.

Similar to the Project, Alternative 1 would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction for the same reasons as the Project. As a result, the impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources during construction would remain less than significant, similar to the Project, although the severity of this impact would be less, as less construction would occur under Alternative 1.

With respect to operation, Alternative 1 would not implement land use and transportation strategies aimed at reducing vehicle trips and energy efficiency strategies to the same degree as the Project. While it is reasonable to expect the rate of energy and fuel demand from future development anticipated by the existing General Plan would decline over time due to regulatory initiatives and technical innovations, it would not decline at the same rate as the Project given that Alternative 1 would not implement land use, transportation, and energy-related efficiency strategies to the same degree as the Project. Therefore, the impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources during operation would be less than significant, similar to the Project, but the severity of this impact would be greater compared to the Project.

Conflict with State or Local Renewable Energy Plan

Construction of development permitted by the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency as individual projects would utilize construction contractors who must demonstrate compliance with applicable regulations. In addition, truck fleet operators must upgrade their fleets with vehicles that meet adopted fuel-efficiency standards for medium- and heavy-duty trucks. With respect to operation, future development that could occur under the Project would be designed in a manner consistent with the policies contained in the proposed General Plan 2045 that are designed to encourage development that results in the efficient use of energy resources. Additionally, new development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. Therefore, impacts would be less than significant.

Individual projects under Alternative 1 would also not conflict with or obstruct a state or local plan for renewable energy or energy efficiency for the same reasons as the Project. However, Alternative 1 does not incorporate policies contained in the proposed General Plan 2045 that are designed to encourage development that results in the efficient use of energy resources. Therefore, while the impact with respect to a conflict with a state or local plan for renewable energy or energy efficiency during construction and operation would be less than significant, similar to the Project, the severity of this impact would be greater, as policies contained in the proposed General Plan 2045 that are designed to encourage development that results in the efficient use of energy resources would not be implemented.

Geology and Soils

Geologic Hazards

Future development under the Project would be required to comply with all applicable design, engineering, and construction standards and requirements of the California Building Code (CBC), the CMCC and policies contained in the proposed General Plan 2045 that are designed to minimize seismic-related geologic hazards. Therefore, the Project would not cause risk of loss, injury, or death associated with seismic hazards, including fault rupture, strong ground shaking, seismic-related ground failure, including liquefaction, or seismic-related landslides and slope instability. As a result, implementation of the Project would result in a less-than-significant impact related to risk of seismic-related geologic hazards.

Development allowed under Alternative 1 would also be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC and the CMCC that address seismic-related geologic hazards. Therefore, the impact with respect to risk of seismic-related geologic hazards would be less than significant, similar to the Project, and the severity of the impact would be similar.

Soil Erosion or Loss of Topsoil

The Project would not result in substantial soil erosion or the loss of topsoil, as future development that disturbs more than one acre would be required to comply with a National

Pollution Discharge Elimination System (NPDES) permit, which would include implementation of BMPs and preparation of a storm water pollution prevention plan (SWPPP), which would include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. In addition, the proposed General Plan 2045 includes policies that encourage the use of BMPs to control soil erosion during and after ground-disturbing activities and the preparation of site-specific geotechnical investigations for projects requiring grading permits. As a result, this impact would be less than significant.

As with the Project, development that would occur under Alternative 1 would be subject to compliance with an NPDES permit, including the preparation of a SWPPP and associated BMPs. Therefore, the impact with respect to soil erosion or loss of topsoil would be less than significant, similar to the Project, and the severity of the impact would be similar.

Unstable and Expansive Soils

The Project would have a less-than-significant impact with respect to unstable soils, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and expansive soils. These potential hazards would be addressed largely through the integration of geotechnical information in the planning and design process in accordance with standard industry practices and state and local requirements. As a result, this impact would be less than significant.

As with the Project, development allowed under Alternative 1 would be required to comply with all applicable design, engineering, and construction standards and requirements that address unstable or expansive soils. Therefore, the impact with respect to risk of unstable or expansive would be less than significant, similar to the Project, and the severity of the impact would be similar.

Paleontological Resources

Future development under the Project would not result in adverse impacts to paleontological resources, as the City's standard conditions of approval require specific steps to be taken to avoid damage and promote preservation of paleontological resources. In addition, proposed policies included in the General Plan 2045 promote public knowledge and protection of paleontological resources. Furthermore, MM GEO-1 would serve to further reduce impacts to paleontological resources by requiring that applicable future projects within the city would be subject to project-specific paleontological studies. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also be required to comply with specific procedures in the City's entitlement process to avoid damage to paleontological resources and promote their preservation. Therefore, impacts to paleontological resources would be less than significant, similar to the Project. However, the severity of this impact could be greater under Alternative 1, as development under Alternative 1 would not be subject to MM GEO-1 that is included in the General Plan 2045.

Greenhouse Gas Emissions

Emissions

The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction, as future projects developed under the Project would be required to comply with applicable federal, state, and local regulations that would reduce the amount of GHG emissions generated by construction equipment and activities. With respect to operation, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, as the net change in operational emissions from existing conditions compared to existing plus buildout under the Project would be negative compared to existing conditions. For these reasons, this impact would be less than significant.

Alternative 1 would also not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction for the same reasons as the Project. Therefore, the impact with respect to the generation of GHG emissions during construction would remain less than significant, similar to the Project, and the severity of this impact would be similar. With respect to operation, as less growth would occur under No Project Alternative, less traffic would be generated and less building space would be constructed, and thus fewer GHG emissions would be generated from motor vehicles and the heating and cooling of buildings. As the net change in operational emissions from existing conditions compared to buildout of the Project would be negative compared to existing conditions, the net change in operational emissions from existing conditions compared to buildout of Alternative 1 would also be negative. Therefore, the impact with respect to the generation of GHG emissions during operation would remain less than significant, similar to the Project, although the severity of this impact would be less, as less traffic would be generated and less development would occur under Alternative 1, thus resulting in fewer GHG emissions compared to the Project.

Conflict with Greenhouse Gas Reduction Plans, Policies, and Regulations

The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs as development that would occur under the Project would be consistent with applicable climate change scoping plan GHG reduction strategies. In addition, it is reasonable to expect the GHG emissions from future development anticipated by the Project would decline over time due to regulatory initiatives and technical innovations, and thus development permitted by the proposed General Plan 2045 would not conflict with or interfere with the ability of the state to achieve its GHG reduction goal of 80 percent below 1990 levels by 2050 as stated in Executive Order S-3-05. In addition, the Project would be consistent with applicable SCAG 2020–2045 RTP/SCS (Connect SoCal) actions and strategies, which work to reduce GHG emissions generated by the transportation sector by aligning transportation, land use, and housing strategies. Finally, the development that would occur under the Project would be required to be consistent with the proposed Greenhouse Gas Reduction Element and with the City's Green Building Program. For these reasons, this impact would be less than significant.

Development permitted under Alternative 1 would implement applicable climate change scoping plan GHG reduction strategies, but not to the same degree as the Project, as the existing General Plan was prepared and adopted before many of these strategies were adopted.

However, it is reasonable to expect the GHG emissions from future development anticipated under Alternative 1 would decline over time due to regulatory initiatives and technical innovations. In addition, it is also reasonable to expect the future development under Alternative 1 would be designed to be consistent with SCAG 2020–2045 RTP/SCS (Connect SoCal) actions and strategies and the City’s Green Building Program. Therefore, while the impact with respect to a conflict with respect to GHG reduction plans, policies, and regulations would likely remain less than significant, similar to the Project, the severity of this impact would be greater as growth under Alternative 1 would not implement land use and transportation strategies aimed at reducing vehicle trips and energy efficiency strategies contained in the General Plan 2045 and would not implement applicable climate change scoping plan GHG reduction strategies to the same degree as the Project.

Hazards and Hazardous Materials

Routine Use, Transportation, Disposal, or Accidental Release of Hazardous Materials

As discussed in Section 4.8, *Hazards and Hazardous Materials*, of this Draft PEIR, the Project would not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials, as the construction and operation of future development allowed under the Project would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials during construction and operation for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emit Hazardous Materials Within One-Quarter Mile of a School

The Project would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site, as existing and future development under the Project in the vicinity of an existing or proposed school site would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hazardous Materials Sites

The Project would not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 as future development under the Project would adhere to applicable federal, state, and local regulations that provide procedures for the testing, handling, disposal, and remediation of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for the same reason as the Project. Therefore, the impact with respect to creating a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Response Plan

The Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), and policies contained in the General Plan 2045 that further ensure adequate emergency access. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would be required by existing regulations, including the MJHMP, to ensure emergency access to each project site. As a result, the impact with respect to the impairment or interference with an adopted emergency response plan or emergency evacuation plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Wildland Fire Hazards

While the majority of the Planning Area is not within a Very High Fire Hazard Severity Zone (VHFHSZ), the California Department of Forestry and Fire Prevention (CAL FIRE) classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within West Los Angeles College and the Inglewood Oil Field (IOF), as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Future development allowed under the Project could include the development of additional residential uses in these neighborhoods, which could expose additional people and structures to wildland fire hazards. The General Plan 2045 contains policies to minimize the risk of fire hazards. With adherence to applicable building codes and review by the Culver City Fire Department (CCFD) to reduce fire hazards, the Project would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

Development allowed under Alternative 1 would also be required to adhere to applicable building codes and review by the CCFD to reduce fire hazards. As a result, the impact with

respect to wildland fire hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hydrology and Water Quality

Water Quality

As discussed in Section 4.9, *Hydrology and Water Quality*, of this Draft PEIR, the Project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, as future development under the Project would comply with applicable federal, state, and local regulations pertaining to water quality. In addition, the Project contains policies that promote improved water quality in the city and continued compliance with federal, state, and local water quality regulations, which would ensure that water quality is protected to the maximum extent practicable. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also adhere to applicable federal, state, and local regulations pertaining to water quality. Therefore, the impact with respect to water quality would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Groundwater

The City's water providers, Los Angeles Department of Water and Power (LADWP) and the Golden State Water Company (GSWC), use a combination of groundwater and surface water. There are limits on the amount of groundwater each provider can pump for potable water supplies, and the potential for overdraft is limited. These water providers would be able to utilize other sources of potable water to supplement a decrease in the amount of available groundwater, if needed. With regard to groundwater recharge, the General Plan 2045 establishes land use designations that encourage mixed uses and infill development, while maintaining existing parks and open space resources and expanding these resources. The Project would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. For these reasons, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would also not substantially deplete groundwater supplies for the same reasons as the Project. Development under the current General Plan would adhere to existing regulations that govern water quality and groundwater sustainability and would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. As a result, the impact with respect to groundwater recharge would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Drainage

Implementation of the Project would not directly alter the course of Ballona Creek (a major drainage that flows through the Planning Area), or any other streams or rivers. In addition, future development under the Project would be required to comply with all applicable

construction and operational laws, regulations, and permits related to hydromodification and discharging into the city's sewer system. For these reasons, the impact of the Project with respect to the alteration of drainage patterns would be less than significant.

Development under Alternative 1 also would not directly alter the course of Ballona Creek or any other streams or rivers. Development under the No Project Alternative would also be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the city's sewer system. Therefore, the impact with respect to drainage would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Inundation

The Planning Area is located approximately 1.5 miles inland from nearby coastal areas and is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the Planning Area with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, the majority of the Planning Area is located outside of a flood hazard zone. For these reasons, the risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area. Additionally, future development facilitated under the Project would be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which would reduce the risk of onsite flooding and release of pollutants. Therefore, impacts associated with release of pollutants from inundation by flood, tsunami, or seiche would be less than significant.

As development allowed under Alternative 1 would also occur within the Planning Area, it would also not be subject to inundation from a tsunami or seiche. In addition, development anticipated under the No Project Alternative would also adhere to existing laws, regulations, and permits related to drainage and flooding hazards, which would reduce the risk of onsite flooding and release of pollutants. Therefore, the impact with respect to inundation would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Water Quality Plan or Sustainable Groundwater Management Plan

Implementation of the Project would not degrade water quality due to compliance with all applicable federal, state, regional, and local water quality laws, regulations, and permits. Moreover, the General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the Planning Area, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable. In addition, implementation of the Project would not interfere with or conflict with the Santa Monica Groundwater Subbasin Groundwater Sustainability Plan (GSP), since the City is a member of the Santa Monica Basin Groundwater Sustainability Agency (SMBGSA), and the Project includes various implementation actions that support the GSP. Furthermore, due to the developed nature of the city and the proposed land use distribution, impacts to groundwater supplies as a result of new impervious surfaces would be less than significant. Therefore, the Project would not conflict with the Santa Monica Subbasin GSP, and impacts would be less than significant.

Development allowed under Alternative 1 would also adhere applicable federal, state, and local regulations pertaining to water quality and groundwater sustainability. In addition, as growth anticipated under the No Project Alternative would be within the same Planning Area, it would also not conflict with the GSP. Therefore, the impact with respect to a water quality plan or sustainable groundwater management plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Land Use and Planning

Physically Divide a Community

The city is primarily built out with residential uses and only 0.6 percent is vacant land. Implementation of the Project would improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the city and the region. The overall land use pattern would not change under the General Plan 2045, and the changes focus density in areas that would not result in a division of a community. Therefore, future development allowed under the General Plan 2045 would not physically divide an established community, and the impact would be less than significant.

Development allowed under Alternative 1 would also not physically divide an established community as the Planning Area is largely built out and future development under the No Project Alternative would likely occur on existing lots served with existing infrastructure, and thus development under Alternative 1 would not necessitate new roads or other infrastructure that would physically divide an established community. Therefore, the impact with respect to physically dividing an established community would remain less than significant, similar to the Project, although the severity of this impact would be greater as policies contained in the proposed General Plan Update that improve connectivity and land use consistency within and between existing neighborhoods would not be implemented under Alternative 1.

Consistency with Applicable Land Use Plans

The Project would not 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. The proposed General Plan Update is intended to provide a framework and vision to guide growth and development within the Planning Area, which includes the City's jurisdictional boundaries and its SOI, through the planning horizon year of 2045. The Zoning Code Update is the mechanism to implement the land use changes proposed in the City's General Plan Update. Implementation of the Project would not conflict with existing planning regulations and policies, including those included in California Government Code Section 65302, the California Complete Streets Act, the SCAG 2020–2045 RTP/SCS (Connect SoCal), the Culver City and Culver City Unified School District (CCUSD) Multi-Jurisdictional Hazard Mitigation Plan, the Culver City Bicycle & Pedestrian Action Plan, and the Culver City Urban Forest Master Plan. For these reasons, this impact would be less than significant.

Development allowed under Alternative 1 would also not 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 as the current General Plan generally complies with most regional and local plans. However, Alternative 1 would not provide sufficient land

capacity to fully meet the City's allocation under the 6th cycle of the RHNA. All future growth under Alternative 1 must be consistent with the existing General Plan, and thus would be consistent with existing zoning and regional and local plans. In addition, all future growth in the City's SOI must be consistent with the Los Angeles County General Plan and Los Angeles County zoning regulations. For these reasons, the impact with respect to consistency with applicable plans would remain less than significant, similar to the Project, although the severity of this impact would be greater as the existing General Plan does not integrate land use, housing, and transportation planning to the same degree as the Project and thus would not implement the SCAG 2020–2045 RTP/SCS (Connect SoCal) to the same degree.

Mineral Resources

Implementation of the Project would not result in the loss of availability of a known non-fuel mineral resource that would be of value to the region and residents of the State, nor would it create the loss of availability of a locally important mineral resource recovery site. No impact to aggregate mineral resources would occur with implementation of the Project. While there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which requires the closure of the City's portion of the IOF. Implementation of the Project would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation in a manner that would render the resources unavailable. As such, the Project would not result in the loss of a regionally and locally important mineral resource. Impacts related to oil and gas resources would be considered less than significant.

Development allowed under Alternative 1 would result in no impact to aggregate mineral resources for the same reason as the Project. Development allowed under Alternative 1 also would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation. Therefore, the impact with respect to oil and gas resources would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Noise and Vibration

Temporary or Permanent Increase in Ambient Noise Levels

Construction of future development under the Project would require the use of heavy equipment during construction activities. The exact locations of future projects and construction that would occur under the Project are not known at this time, though it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the City is generally built out. The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration and intensity of the activity. For future development projects requiring discretionary approval, a project-specific noise analysis would be prepared to determine significance and if necessary, recommend mitigation measures, in accordance with CEQA. Even with mandatory compliance with CCMC requirements, it is possible that some future development projects could be large in construction intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Implementation

of Mitigation Measure MM NOI-1 would help to reduce the potentially significant construction-related impacts. However, even with implementation of Mitigation Measure MM NOI-1, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, it is possible that some future development under the Project could generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact. There are no feasible mitigation measures to reduce traffic noise levels. While General Plan Update policies would serve to limit traffic noise exposure to sensitive receptors, these policies cannot ensure that noise levels would be reduced to levels below the City's noise standards at all sensitive receptors. Therefore, traffic noise impacts under the Project would be significant and unavoidable.

Construction of future development allowed under Alternative 1, could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with CCMC requirements. For discretionary projects requiring CEQA review, implementation of mitigation measures, in addition to CCMC compliance, would help to reduce the potentially significant construction-related impacts. However, even with implementation of mitigation measures, impacts could exceed significance thresholds. Therefore, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1 compared to the Project, and thus less construction noise would be generated.

As with the Project, future development under Alternative 1 could generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact. As is the case for the Project, there are no feasible mitigation measures to reduce traffic noise levels. Therefore, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1 compared to the Project, and thus less traffic noise would be generated.

Excessive Groundborne Vibration or Groundborne Noise

Some future development projects under the Project could generate construction-period groundborne vibration and groundborne noise levels that exceed the specified limits in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance and result in a significant impact. Even with implementation of Mitigation Measure MM NOI-2, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, future development projects under the Project could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. However, groundborne vibration and groundborne noise from operational sources would be characterized as typically low and would not be expected to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance. As a result, groundborne vibration and groundborne noise impacts during operation would be less than significant, and no mitigation is required.

Future development projects under Alternative 1 could also generate construction-period groundborne vibration and groundborne noise levels that exceed thresholds. Therefore, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1 compared to the Project, and thus less construction-period groundborne vibration and groundborne noise levels would be generated.

As less growth would occur under the No Project Alternative, less groundborne vibration and groundborne noise impacts during operation would be generated. Therefore, the impact would remain less than significant, similar to the Project, although the severity of this impact would be less.

Population and Housing

Induce Unplanned Population Growth

As discussed in Section 4.13, *Population and Housing*, of this Draft PEIR, by virtue of the fact that the General Plan 2045 is the long-range blueprint for growth and development in the city, the population growth (both in housing and employment) anticipated to occur as a result of the Project would be considered planned growth. The General Plan 2045 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. Moreover, because the city has supported urban growth and development for more than 100 years and is served with infrastructure (e.g., roads, freeways, railroads, transit, water, sewer, storm drainage, electricity, natural gas, etc.) implementation of the Project would not result in indirect growth. Impacts would be less than significant. As such, the Project would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant.

Future development under Alternative 1 would be the continuation of growth in the city guided by the City's adopted 1996 General Plan and the current Zoning Code. Enough development capacity remains under the existing General Plan that future growth allowed under Alternative 1 could be accommodated within the existing framework, and thus this future growth would not be substantial. Therefore, the impact with respect to the inducement of unplanned population growth would be less than significant, similar to the Project, although the severity of this impact would be less as all growth under Alternative 1 would be planned.

Construction of New Housing

The Project would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. A substantial portion (approximately 29 percent) of developed land in the Planning Area consists of single-family residential uses, which are not anticipated to undergo significant land use changes under the Project. Proposed land use designations would introduce greater flexibility of uses, such as mixed-use, and allow residential uses in more areas of the city, including within industrial areas of the city. The City Council adopted the Culver City Housing Element 2021–2029 on August 8, 2022, and the

Housing Element 2021–2029 was certified by HCD on October 10, 2022.⁶ The proposed Land Use Element reflects the new land use designations that would allow greater residential densities in order to meet the RHNA obligation for the 2021–2029 housing element cycle. In addition, the Housing Element includes an in-depth analysis of the city’s housing stock, past and anticipated trends, and housing needs that inform the element’s goals, policies, and programs, which include provisions to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the city’s fair share of the region’s housing need, preserve at-risk affordable housing units, and affirmatively further fair housing opportunities. The General Plan 2045 includes policies that support these objectives, including those that seek to ensure equity and protect diversity in Culver City’s communities. For these reasons, growth anticipated under the General Plan 2045 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

Population growth under Alternative 1 would be less than under the Project. As discussed above, enough development capacity remains under the existing General Plan that future growth allowed under Alternative 1 could be accommodated. This growth would likely occur in places where properties could be developed at higher densities under existing zoning (i.e., underutilized parcels). While some redevelopment may occur and cause some displacement, adherence to state and County regulations that address the displacement of residents would mitigate these effects, and it is not expected that such development would impact substantial numbers. Therefore, the impact with respect to the construction of new housing would remain less than significant, similar to the Project although the severity of this impact would be less, as less growth would occur under Alternative 1 compared to the Project.

Public Services

Fire and Police Service

As discussed in Section 4.14, *Public Services*, of this Draft PEIR, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire and police service facilities, as future development would be concentrated in areas already well-served by existing fire and police facilities. In addition, the Project would promote compact development patterns through infill development, ensuring new development would be located within close proximity to existing fire stations and police stations. If new fire and police facilities are needed, the construction of these facilities would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. For these reasons, this impact would be less than significant.

As less growth would occur under Alternative 1 compared to the Project, demand for fire and police service would be less under the No Project Alternative than under the Project. If new or expanded fire and police facilities are required under Alternative 1, they would be subject to environmental review and associated mitigation requirements to minimize adverse physical

⁶ Culver City, 2023. Housing Element Update Timeline. <https://www.pictureculvercity.com/housing-element/#updatetimeline>. Accessed April 2023.

effects. Therefore, the impact with respect to fire and police services would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth and less demand for these services would occur under Alternative 1 compared to the Project.

Schools

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. The growth anticipated by the Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and anticipated school capacity. The Culver City Unified School District (CCUSD) would continue to collect development impact fees throughout implementation of the Project, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per Senate Bill (SB) 50. For these reasons, this impact would be less than significant.

As less growth would occur under Alternative 1 compared to the Project, fewer students would be generated under Alternative 1. If new school facilities are required under Alternative 1, the construction of these facilities would also be subject to compliance with existing regulations, including payment of statutory fees that fully mitigate the impacts of development on school facilities pursuant to CEQA. Therefore, the impact with respect to schools would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for schools under Alternative 1 compared to the Project.

Parks

A comparison of impacts to parks and recreation facilities between the Project and Alternative 1 is provided below under “Recreation.”

Other Public Facilities

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, such as libraries, as the construction of these facilities, if needed, would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. As a result, this impact would be less than significant.

As less growth would occur under Alternative 1 compared to the Project, demand for other public facilities, such as libraries, would be less under the No Project Alternative than under the Project. If new public facilities are required, they would be subject to environmental review and associated mitigation requirements to minimize adverse physical effects. Therefore, the impact with respect to public facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 1 compared to the Project.

Recreation

Deterioration of Existing Recreational Facilities

As discussed in Section 4.15, *Recreation*, of this Draft PEIR, although the City is currently not meeting the park service ratio standard, the General Plan 2045 includes policies that would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, the Project would not 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. Impacts would be less than significant.

Although less growth would occur under Alternative 1 compared to the Project, the City would continue to not meet the park service ratio standard under this alternative. Consequently, absent policies that would address the potential impact, Alternative 1 could result in a significant and unavoidable impact with respect to the deterioration of existing recreational facilities. As no feasible mitigation is available to reduce the impact to less than significant, the severity of this impact would be greater compared to the Project.

Construction or Expansion of Recreational Facilities

The Project would encourage the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. The precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for future development projects or master/specific plans. Future recreational facilities would be consistent with the proposed land use designations and policies and would be subject to additional environmental review under CEQA, as needed. For these reasons, this impact would be less than significant.

Growth under Alternative 1 could also result in the development of new parks and recreational facilities. Like the Project, construction of new parks and recreational facilities would also be subject to CEQA requirements for environmental assessment. Therefore, the impact with respect to the construction or expansion of recreational facilities would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Transportation

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy

As discussed in Section 4.16, *Transportation*, of this Draft PEIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle and pedestrian facilities due to the availability of non-vehicular transportation options for the community. In addition, policies included in the General Plan 2045 would balance the multimodal transportation network by providing alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation. As a result, this impact would be less than significant.

Future development under Alternative 1 would also not conflict with a program, plan, ordinance, or policy addressing the circulation system, as non-vehicular transportation options for the community would also be available under continued growth as permitted by the existing

General Plan. In addition, while policies in the existing General Plan do not balance the multimodal transportation network as well as the Project, Alternative 1 does include policies that promote the use of alternative modes of transportation. As a result, the impact with respect to a conflict with an adopted circulation program, plan, ordinance, or policy would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Vehicle Miles Traveled

The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) as total VMT per service population associated with growth under the General Plan 2045 would not achieve a 15 percent or more reduction compared to the baseline. Although policies promoting a reduction of VMT per capita are included in the General Plan 2045, no feasible mitigation is available to reach the 15 percent or more reduction threshold. As a result, this impact would be significant and unavoidable.

As less growth would occur under Alternative 1 compared to the Project, less traffic would be generated along streets in the Planning Area, and thus less VMT would be generated under the existing General Plan. Although Alternative 1 would not encourage mixed use development, which serves to reduce VMT, to the extent of the Project, the reduction in growth would generate less trips. However, this reduction in VMT under Alternative 1 would not likely be enough to achieve a 15 percent or more reduction compared to the baseline. As a result, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less as less traffic would be generated under Alternative 1 compared to the Project.

Design Hazards

The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses as access locations for future development would be designed to the City's standards and would provide adequate sight distance. In addition, policies included in the General Plan 2045 that promote bicycle and pedestrian safety would help identify and address potential safety concerns. Therefore, this impact would be less than significant.

Future development under Alternative 1 would also be designed in compliance with the City's standards for safety and would provide adequate sight distance. As a result, the impact with respect to design hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Access

Future development under the Project would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable. The City's development review process would ensure that future development under the Project would be consistent with these policies and would not hinder emergency access. For these reasons, the Project would not result in inadequate emergency access, and this impact would be less than significant.

Future development under Alternative 1 would also not result in inadequate emergency access for the same reason as the Project. Therefore, the impact with respect to emergency access would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Tribal Cultural Resources

No tribal cultural resources have been identified within or adjacent to the Planning Area. However, there are unevaluated prehistoric resources within the Planning Area that could be potential tribal cultural resources and, given the prehistoric occupation of the area, it is possible that future development under the Project may result in the identification of unrecorded tribal cultural resources. However, future projects would be required to comply with the provisions of Senate Bill (SB) 18 and Assembly Bill (AB) 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures, if necessary, are implemented to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Adherence to these regulations and implementation of General Plan policies would ensure that the Project's impact with respect to tribal cultural resources would be less than significant.

Development under Alternative 1 may also result in the identification of unrecorded tribal cultural resources. As with the Project, future development under Alternative 1 would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Therefore, the impact to tribal cultural resources is expected to be reduced to a less-than-significant level, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1, and thus there would be less potential to negatively affect tribal cultural resources.

Utilities and Service Systems

New or Expanded Facilities

As discussed in Section 4.18, *Utilities and Service Systems*, of this Draft PEIR, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. However, future development under the Project could require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, and should upgrades to new facilities be required, the construction of those facilities could result in adverse environmental effects, which are considered throughout the technical sections of this Draft PEIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. As a result, this impact would be less than significant.

Development allowed under Alternative 1 could also require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities. If upgrades to facilities were to be required, the construction of those facilities could result in adverse environmental effects. Future facilities under the No Project Alternative, if required, would be required to comply with applicable CEQA review and mitigation of environmental impacts and the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. For these reasons, the impact with respect to new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1.

Water Supply

Culver City is served by two water service providers: the Golden State Water Company (GSWC) and Los Angeles Department of Water and Power (LADWP). GSWC's 2020 Urban Water Management Plan (UWMP) and LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's and LADWP's water supply projections in their respective 2020 UWMPs are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the SCAG 2020–2045 RTP/SCS (Connect SoCal). As discussed in Section 4.18, the Project is consistent with the demographic projections in the 2020–2045 RTP/SCS, and there would be sufficient water supplies available to serve the Project. In addition, future development under the Project would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Future development under the Project would also adhere to policies in the General Plan 2045 aimed at reducing demand over time. Based on the above, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and water supply impacts would be less than significant.

As less growth would occur under Alternative 1 compared to the Project, demand for water would be less than under the Project. As there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single dry, and multiple dry years, there would be sufficient water supplies available to serve Alternative 1 and reasonably foreseeable future development during normal, single dry, and multiple dry years. As is the case for the Project, future development under Alternative 1 would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Consequently, impacts related to water supply would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1.

Wastewater Service Capacity

The wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to future growth anticipated under the General

Plan 2045. In addition, policies in the proposed General Plan Update aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. For these reasons, this impact would be less than significant.

As less growth would occur under Alternative 1 compared to the Project, less wastewater would be generated under the No Project Alternative. As the wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to the Project, sufficient capacity also exists to treat wastewater generated by growth anticipated under Alternative 1. In addition, future development under Alternative 1 would continue to adhere to existing regulations and policies that aim to conserve water, which in turn, would reduce the amount of wastewater generated. As a result, the impact with respect to wastewater service capacity would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less wastewater generated under Alternative 1 compared to the Project.

Solid Waste

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, as the landfills that currently serve the city have adequate capacity to dispose of the full increase in solid waste attributable to future growth anticipated under the Project. In addition, compliance with existing solid waste regulations and policies in the proposed General Plan Update would further address potential impacts. Therefore, this impact would be less than significant.

As less growth would occur under the No Project Alternative compared to the Project, less solid waste would be generated under Alternative 1. As the landfills serving the Planning Area currently have adequate capacity to dispose of the full increase in solid waste attributable to Project, sufficient capacity also exists to treat solid waste generated by growth anticipated under Alternative 1. In addition, future development under Alternative 1 would comply with solid waste regulations that aim to reduce solid waste. As a result, the impact with respect to solid waste disposal capacity would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur, and there would be less solid waste generated under Alternative 1 compared to the Project.

Solid Waste Regulations

The Project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. In addition, the policies in the proposed General Plan Update regarding solid waste disposal and associated public facilities would further ensure compliance with applicable regulations. As a result, this impact would be less than significant.

Development under Alternative 1 would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. As a result, the impact with respect to solid waste regulations would remain less than significant, similar to the Project.

Wildfire

Emergency Response or Evacuation Plans

As discussed in Section 4.19, *Wildfire*, and Section 4.8, *Hazards and Hazardous Materials*, of this Draft PEIR, the Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies in the proposed General Plan Update that further ensure adequate emergency access. As a result, this impact would be less than significant.

Development allowed under Alternative 1 would be required by existing regulations, including the MJHMP, to ensure emergency access to each project site. As a result, the impact with respect to the impairment or interference with an adopted emergency response plan or emergency evacuation plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Exacerbate Wildfire Risks

While the majority of the Planning Area is not within a VHFHSZ, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Development associated with the Project would primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. If a fire were to occur in the more flat and urbanized areas of the Planning Area, the risk of the fire spreading rapidly would be less than in areas with steeper slopes. In addition, smoke from wildfires occurring in Los Angeles County and across the state has resulted in poor air quality within Culver City. Future development under the Project could exacerbate wildfire risks such that residents and occupants could be exposed to pollutant concentrations associated with smoke from a wildfire or the uncontrolled spread of wildfire. Compliance with the applicable requirements of the CBC, the California Fire Code (CFC), the CCMC, the policies of the General Plan 2045, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant.

As development allowed under Alternative 1 would also occur within the Planning Area Alternative 1 could also exacerbate wildfire risks as identified for the Project. As with the Project, required compliance with the applicable requirements of the CBC, the CFC, the CCMC, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant. Therefore, the impacts related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1.

Infrastructure Which Could Exacerbate Fire Risk

The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the Project, including private and public improvements throughout the city,

would generally occur in urban and developed areas that contain existing defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. However, If future development under the Project were to require the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, the construction or relocation of these facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. In addition, development allowed under the Project would occur in urbanized and developed areas where existing infrastructure, including highways and roadways, is already in place. The existing roadway patterns would be retained. While some modifications would occur to accommodate alternate modes of transportation, no new roadways are proposed. Compliance with CFC, CBC, and consistency with General Plan Update policies, as well as review of all new structures and private and public improvements by CCFD, would ensure that fire risks are not exacerbated. For these reasons, impacts related to infrastructure which could exacerbate fire risk would be less than significant.

Development of new or expanded infrastructure under Alternative 1 would be subject to compliance with applicable CFC, CBC, CCFD, and environmental review requirements to ensure that fire risks are not exacerbated. Therefore, the impacts related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1.

Expose People or Structures to Significant Risks

Future development allowed under the Project would be subject to the applicable regulations and requirements of the CCMC as well as policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that the Project would not 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. Therefore, impacts related to exposure of people or structures to significant wildfire risks would be less than significant.

As with the Project, development under Alternative 1 would be subject to the applicable regulations and requirements of the CCMC and applicable regulations regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that development under Alternative 1 would not 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. Therefore, impacts related to exposure of people or structures to significant wildfire risks would be reduced to a less-than-significant level, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 1.

Relationship of the Alternative to the Project Objectives

Alternative 1, the No Project Alternative, represents what would be reasonably expected to occur in the foreseeable future if the Project were not adopted and the City's current General

Plan and Zoning Code remain in effect. Future development under Alternative 1 would be the continuation of growth in the city guided by the adopted 1996 General Plan and the current Zoning Code. This alternative would not meet most of the Project objectives and would not meet the underlying purpose of the Project since Alternative 1 would not result in the adoption and implementation of a comprehensive update to the Culver City General Plan and amendments to the City’s Municipal Code to implement the General Plan 2045. Under Alternative 1, none of the land use designations and policies in the proposed General Plan Update designed to foster a vibrant and sustainable community, respond to an increasingly diverse and aging population, and address a myriad of physical, environmental, and other challenges that the city faces would be implemented. Alternative 1 would not meet the key goals of the Project to promote mixed-use development, better integration of land uses, improved alternate modes of transportation, equity (housing and health), and sustainability. Alternative 1 would not meet the specific Project objectives to provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures; advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations; adopt innovative and equitable policies to eliminate greenhouse gas emissions, reduce energy and water use, encourage the purchase of 100 percent renewable, carbon-free electricity, foster the transition to zero-emission vehicles, and adapt to climate disruption; and practice resilient and sustainable solutions to maintain and improve infrastructure, including water, road infrastructure, and broadband. Consequently, Alternative 1 would not meet most of the Project objectives and would not meet the underlying purpose of the Project.

5.5.2 Alternative 2 – Concentrated Growth Alternative

Description of the Alternative

Alternative 2, the Concentrated Growth Alternative, would be similar to the Project but would result in a different land use distribution strategy than the Project. Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. Therefore, under Alternative 2, the goals, policies, and implementation actions contained within the proposed General Plan elements would be applicable. Alternative 2 also includes all of the mobility improvements as proposed for the Project throughout the planning horizon of 2045. As with the Project, a Zoning Code Update for Alternative 2 would provide the development standards to implement the General Plan 2045.

As shown in Table 5-1, the Concentrated Growth Alternative is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in the activation and concentration of new mixed-use growth along commercial corridors and in existing non-residential districts in combination with moderate densification across the Planning Area. Specifically, commercial corridors in the city,

such as Washington Boulevard and Sepulveda Boulevard, would be upzoned to allow for higher densities. For example, more area in Fox Hills would be designated as Mixed Use High (MUH) thereby allowing more density in the area. In addition, areas along Sepulveda Boulevard that are designated Mixed Use Corridor 2 (MUC 2) under the Project would be designated Mixed Use Medium (MUM) thereby allowing greater density along the corridor. Areas along Jefferson under Alternative 2 would have less Industrial Mixed Use on Jefferson compared with the Project. Under Alternative 2 along Washington Boulevard In the southern portion of the city would be Mixed Use Corridor 2, allowing greater density compared with the Project.

In addition, as with the Project, Alternative 2 identified opportunity sites. Most properties fronting major corridors, such as Jefferson, Sepulveda, Washington, and Culver Boulevards, as well as all non-residential portions of Fox Hills were considered as opportunity sites. Compared to the Project, the opportunity sites under the Concentrated Growth Alternative would result in greater residential densities and non-residential intensities along the corridors. Implementation of this alternative could result in greater amounts of mixed-use development throughout the city on corridors compared to the Project.

Environmental Impacts

Aesthetics

Scenic Vistas

The Project would not have a substantial adverse effect on a scenic vista, as land use designations under the proposed General Plan Update focus development toward portions of the Planning Area that are already developed, and thus would relieve pressure to develop in open space and natural areas. In addition, the Project includes several policies that would regulate scenic quality and resources. For these reasons, this impact would be less than significant. In addition, the Zoning Code Update, which is the implementation mechanism, would provide requirements for future development consistent with the General Plan goals and policies. The Zoning Code Update would provide the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights. As such, the Zoning Code Update would not result in a substantial adverse effect on a scenic vista. Future development would be reviewed by the City for compliance with applicable requirements and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, impacts related to scenic vistas would be less than significant.

As with the Project, development under Alternative 2 would be directed toward portions of the Planning Area that are already developed and thus would relieve pressure to develop in open space and natural areas. The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that regulate scenic quality and resources as are found in the Project. Therefore, the impact with respect to scenic vistas would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Consistency with Applicable Zoning and Regulations Governing Scenic Quality

While the Project would result in an increase in densities and intensities of land uses, the majority of the proposed changes would occur within Culver City, with limited land use changes occurring within SOI. Proposed policies in the General Plan 2045 are intended to complement and improve the existing scenic quality and resources in the city as well as to implement the City's vision for the future character of the city. The Zoning Code Update would provide specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights consistent with the General Plan 2045. As such, the Zoning Code Update would not conflict with the General Plan 2045 and other regulations governing scenic quality. Therefore, impacts would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that regulate scenic quality and resources as are found in the Project. Therefore, the impact with respect to consistency with applicable zoning and other regulations governing scenic quality would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Light and Glare

The Planning Area is urban in nature and thus, future development under the Project would primarily occur on parcels that contain uses that currently generate light and/or glare. While future development would include additional lighting and/or materials that could cause glare, the addition of these light and glare sources would be consistent with the existing urban environment and would replace the previous onsite light and glare sources. Therefore, any increase in ambient nighttime light conditions would not be substantial and would not be out of character with the urban environment. In addition, the General Plan 2045 includes policies related to buffering between uses and avoiding light spill and glare onto residential properties and sensitive habitats. Future development would be required to comply with applicable lighting regulations and standards in the CCMC. Therefore, impacts regarding light and glare that could affect day or nighttime views in the area would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies related to buffering between development and sensitive habitats, and between future development and existing uses as are found in the Project. As is the case for the Project, adherence to design standards in the CCMC and policies in the General Plan 2045 would ensure that light and glare from future development and redevelopment projects facilitated under Alternative 2 would be minimized. Therefore, the impact with respect to light and glare that could affect day or nighttime views in the area would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Air Quality

Air Quality Plan

Culver City continues to coordinate with the SCAQMD and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of future development under the proposed General Plan and Zoning Code Update would not conflict with or obstruct the implementation of the applicable air quality plan. Nonetheless, the growth projections under the Project would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would be significant. Implementation of Mitigation Measures MM AQ-1 through MM AQ-5 would serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development under the Project. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, impacts would remain significant and unavoidable.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that address air quality as are found in the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. Similar to the Project, the growth projections contained in Alternative 2 would exceed the current SCAG growth forecasts for Culver City, although, by a slightly reduced margin than the Project. Similar to the Project, future development under Alternative 2 would be required to comply with applicable AQMP construction and operational control strategies. Therefore, the impact with respect to a conflict with the applicable air quality plan during construction and operation would be significant and mitigation would be required. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, the growth projections under the Alternative 2 would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would remain significant and unavoidable, similar to the Project.

Criteria Pollutants

The Project could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment, as the construction and operation of individual future projects would generate emissions of criteria pollutants that could exceed regional significance thresholds. Even with the implementation of mitigation measures (MM AQ-1 and MM AQ-5), this impact would be significant and unavoidable.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that address air quality as are found in the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. It is

possible that Alternative 2 could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment for the same reason as the Project. However, future development under Alternative 2 would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the Project to reduce construction phase and operational emissions. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Substantial Pollutant Concentrations

The Project could expose sensitive receptors to substantial pollutant concentrations, as the construction and operation of individual future projects would generate emissions of nitrogen NO_x, CO, PM₁₀, and PM_{2.5} that could exceed localized significance thresholds established by the SCAQMD. In addition, the construction and operation of individual future projects could expose nearby sensitive receptors to levels of toxic air contaminants that could result in a potential increase in cancer, acute, and/or chronic risk. Even with the implementation of MM AQ-6 and MM AQ-7, this impact would be significant and unavoidable.

Alternative 2 could also expose sensitive receptors to substantial pollutant concentrations during construction and operation for the same reasons as the Project. Future development in the city would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the Project to reduce localized air quality and health risk impacts. However, even with implementation of mitigation measures, impacts could exceed the significance thresholds. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Biological Resources

Special-Status Species

As discussed in Section 4.3, *Biological Resources*, of this Draft PEIR, the Project could have a substantial adverse effect on special-status plant and wildlife species that occur within the Planning Area. However, with adherence to proposed General Plan policies related to the protection of biological resources; compliance with all applicable laws, regulations, and ordinances related to the protection of special-status plant and wildlife species; and implementation of mitigation measures (MM BIO-1 and MM BIO-2), this impact would be reduced to a less-than-significant level.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Development allowed under Alternative 2 could also have a substantial adverse effect on riparian habitat or other sensitive natural communities that occur within the Planning Area. As is the case for the Project, development allowed under Alternative 2 would adhere to proposed General Plan policies related to the protection of biological resources; compliance with all applicable laws, regulations, and ordinances related to the protection of special-status plant and wildlife species; and implementation of mitigation measures (MM BIO-1 and MM BIO-2). Therefore, the impact to riparian habitat or other sensitive natural communities under Alternative 2 is expected to be reduced to a less-than-significant level, similar to the Project, and the severity of this impact would be similar.

Riparian Habitat or Sensitive Natural Habitat

Given the lack of any sensitive natural communities, including lack of riparian habitat, within the Planning Area, the Project would have no effect on these resources. Therefore, the Project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by CDFW or USFWS. The Project would have no impact.

Development allowed under Alternative 2 would also not have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS for the same reason as the Project. Therefore, as is the case for the Project, no impact would occur.

State or Federally Protected Wetlands

The Project would not have a substantial adverse effect on state or federally protected wetlands, as there are no wetlands present within the Planning Area. As a result, no impact would occur. In addition, the planned Ballona Creek Revitalization Project would enhance the restoration and use of Ballona Creek. Restoration activities may require Clean Water Act permits from the USACE and the RWQCB and/or a streambed alteration agreement from CDFW, which would be obtained prior to any work, and permit conditions would be implemented. Impacts would be less than significant.

Development allowed under Alternative 2 would also not have a substantial adverse effect on state or federally protected wetlands for the same reason as the Project. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Wildlife Corridors or Wildlife Nursery Sites

As there are no wildlife corridors present within the Planning Area, the Project would have no effect on wildlife corridors. In addition, nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where implementation of the General Plan 2045 could directly or indirectly impact these biological resources. Compliance with the General Plan 2045 goals and policies, the Zoning Code Update, the MBTA, and mitigation measure MM BIO-2 would ensure that impacts to nesting birds would be reduced to less than significant. Based on review of available information, no known non-avian wildlife nursery sites occur within the Planning Area.

Development allowed under Alternative 2 would also not have a substantial adverse effect on wildlife corridors or non-avian wildlife nursery sites for the same reason as the Project. Therefore, as is the case for the Project, no impact would occur.

Development allowed under Alternative 2 could also have a substantial adverse effect on nesting birds and/or nesting bird habitat that occur within the Planning Area for the same reasons as the Project. As is the case for the Project, compliance with the General Plan 2045 goals and policies, the Zoning Code Update, the MBTA, and mitigation measure MM BIO-2 would ensure that impacts to nesting birds under Alternative 2 would be reduced to less than

significant. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Conflict with Tree Preservation Policy or Ordinance

Future development facilitated by the Project would be subject to the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. In addition, proposed General Plan Update policies would serve to promote a strong urban forest across public and private properties and enhance tree health and appearance of streets and other public spaces through the regular maintenance as well as tree and landscaping planting and care of the existing canopy. Consistency with these policies would further ensure the impacts of the General Plan 2045 to existing and proposed tree resources would be minimized. Therefore, conflicts with local policies or ordinances protecting biological resources would not occur, and impacts would be less than significant.

Development allowed under Alternative 2 would also not conflict with a tree preservation policy or ordinance for the same reason as the Project. Therefore, the impact related to conflicts with local policies or ordinances protecting biological resources would not occur, and impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Cultural Resources

Historic Resources

As discussed in Section 4.4, *Cultural Resources*, of this Draft PEIR, future development under the General Plan 2045 may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. Even with adherence to the existing City Historic Preservation Ordinance, which outlines a designation process, criteria, and procedures for altering or modifying designated cultural resources; proposed General Plan policies related to the protection of cultural resources; and implementation of MM CUL-1, this impact would be significant and unavoidable.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would also adhere to the existing City Historic Preservation Ordinance and would include the same policies and mitigation measures that address potential effects to cultural resources as are found in the Project. Even with adherence to the existing City Historic Preservation Ordinance and proposed General Plan policies related to the protection of cultural resources and implementation of Mitigation Measure MM CUL-1, the impact related to a substantial adverse change in the significance of a historical resource under Alternative 2 would not be reduced to a less-than-significant level. As a result, this impact would be significant and unavoidable, similar to the Project.

Archaeological Resources

The Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Adherence to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction, implementation of MM CUL-2, and implementation of applicable policies in the General Plan 2045 would reduce the impact to a less-than-significant level.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would also adhere to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction and would include the same policies and mitigation measures that address potential effects to archeological resources. Therefore, the impact related to archaeological resources would be less than significant, similar to the Project, and the severity of this impact would be similar.

Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Under the Project, energy use for construction of new developments would be for on-site activities and to transport construction materials and demolition debris as needed. In addition, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of new developments that could occur under the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant. With respect to operation, future development would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations. Therefore, future development under the Project would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during operation.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that address energy resources as are found in the Project. Alternative 2 would also not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction for the same reasons as the Project. As a result, the impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources during construction would remain less than significant, similar to the Project, and the severity of this impact would be similar. With respect to operation, future development under Alternative 2 would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations. Therefore, future development under Alternative 2 would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during operation, similar to the Project, and the severity of this impact would be similar.

Conflict with State or Local Renewable Energy Plan

Construction of development permitted by the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency as individual projects would utilize construction contractors who must demonstrate compliance with applicable regulations. In addition, truck fleet operators must upgrade their fleets with vehicles that meet adopted fuel-efficiency standards for medium- and heavy-duty trucks. With respect to operation, future development that could occur under the Project would be designed in a manner consistent with the policies contained in the proposed General Plan Update that are designed to encourage development that results in the efficient use of energy resources. Additionally, new development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. For these reasons, this impact would be less than significant.

Individual projects under Alternative 2 would also not conflict with or obstruct a state or local plan for renewable energy or energy efficiency for the same reasons as the Project. For these reasons, the impact would be less than significant, similar to the Project, and the severity of the impact would be similar.

Geology and Soils

Geologic Hazards

Future development under the Project would be required to comply with all applicable design, engineering, and construction standards and requirements of the California Building Code (CBC), the CMCC and policies contained in the proposed General Plan Update that are designed to minimize seismic-related geologic hazards. Therefore, the Project would not cause risk of loss, injury, or death associated with seismic hazards, including fault rupture, strong ground shaking, seismic-related ground failure, including liquefaction, or seismic-related landslides and slope instability. As a result, implementation of the Project would result in a less-than-significant impact related to risk of seismic-related geologic hazards.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies that address potential effects related to geology and soils as are found in the Project. As is the case for the Project, future development under Alternative 2 would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC, the CMCC, and policies contained in the proposed General Plan Update that are designed to further minimize seismic-related geologic hazards. Therefore, the impact with respect to risk of seismic-related geologic hazards would be less than significant, similar to the Project, and the severity of the impact would be similar.

Soil Erosion or Loss of Topsoil

The Project would not result in substantial soil erosion or the loss of topsoil, as future development that disturbs more than one acre would be required to comply with an NPDES

permit, which would include implementation of BMPs and preparation of a SWPPP, which would include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. In addition, the proposed General Plan Update includes policies that encourage the use of BMPs to control soil erosion during and after ground-disturbing activities and the preparation of site-specific geotechnical investigations for projects requiring grading permits. As a result, this impact would be less than significant.

As is the case for the Project, future development under Alternative 2 that disturbs more than one acre would be subject to compliance with an NPDES permit and SWPPP and policies included in the General Plan 2045 that address impacts related to soil erosion or loss of topsoil. Therefore, the impact with respect to soil erosion or loss of topsoil would be less than significant, similar to the Project, and the severity of the impact would be similar.

Unstable and Expansive Soils

The Project would have a less-than-significant impact with respect to unstable soils, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and expansive soils. These potential hazards would be addressed largely through the integration of geotechnical information in the planning and design process in accordance with standard industry practices and state and local requirements. As a result, this impact would be less than significant.

As is the case for the Project, development allowed under Alternative 2 would be required to comply with all applicable design, engineering, and construction standards and requirements that address unstable or expansive soils. Therefore, the impact with respect to risk of unstable or expansive would be less than significant, similar to the Project, and the severity of the impact would be similar.

Paleontological Resources

Future development under the Project would not result in adverse impacts to paleontological resources, as the City's standard conditions of approval require specific steps to be taken to avoid damage and promote preservation of paleontological resources. In addition, proposed policies included in the General Plan 2045 promote public knowledge and protection of paleontological resources. Furthermore, MM GEO-1 would serve to further reduce impacts to paleontological resources by requiring that applicable future projects within the city would be subject to project-specific paleontological studies. As a result, this impact would be less than significant.

As is the case for the Project, development allowed under Alternative 2 would be required to comply with specific procedures in the City's entitlement process to avoid damage to paleontological resources and promote their preservation, as well as proposed General Plan policies that promote public knowledge and protection of paleontological resources, and the requirements of Mitigation Measure MM GEO-1. Therefore, impacts to paleontological resources would be less than significant, similar to the Project, and the severity of the impact would be similar.

Greenhouse Gas Emissions

Emissions

The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction, as future projects developed under the Project would be required to comply with applicable federal, state, and local regulations that would reduce the amount of GHG emissions generated by construction equipment and activities. With respect to operation, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, as the net change in operational emissions from existing conditions compared to existing plus buildout under the Project would be negative compared to existing conditions. For these reasons, this impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. As is the case for the Project, Alternative 2 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction for the same reasons as the Project. Therefore, the impact with respect to the generation of GHG emissions during construction under Alternative 2 would remain less than significant, similar to the Project, and the severity of this impact would be similar. With respect to operation, as is the case for the Project, Alternative 2 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, as the net change in operational emissions from existing conditions compared to existing plus buildout of new development under Alternative 2 would be negative compared to existing conditions. For these reasons, this impact would be less than significant, similar to the Project, and the severity of this impact would be similar.

Conflict with Greenhouse Gas Reduction Plans, Policies, and Regulations

The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs as development that would occur under the Project would be consistent with applicable climate change scoping plan GHG reduction strategies. In addition, it is reasonable to expect the GHG emissions from future development anticipated by the Project would decline over time due to regulatory initiatives and technical innovations, and thus development permitted by the proposed General Plan Update would not conflict with or interfere with the ability of the state to achieve its GHG reduction goal of 80 percent below 1990 levels by 2050 as stated in Executive Order S-3-05. In addition, the Project would be consistent with applicable SCAG 2020–2045 RTP/SCS (Connect SoCal) actions and strategies, which work to reduce GHG emissions generated by the transportation sector by aligning transportation, land use, and housing strategies. Finally, the development that would occur under the Project would be required to be consistent with the proposed Greenhouse Gas Reduction Element and with the City’s Green Building Program. For these reasons, this impact would be less than significant.

Development permitted under Alternative 2 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs for the same reasons as the Project. For these reasons, this impact would be less than significant, similar to the Project, and the severity of this impact would be similar.

Hazards and Hazardous Materials

Routine Use, Transportation, Disposal, or Accidental Release of Hazardous Materials

The Project would not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials, as the construction and operation of future development allowed under the Project would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials during construction and operation for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emit Hazardous Materials Within One-Quarter Mile of a School

The Project would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site, as existing and future development under the Project in the vicinity of an existing or proposed school site would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hazardous Materials Sites

The Project would not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 as future development under the Project would adhere to applicable federal, state, and local regulations that provide procedures for the testing, handling, disposal, and remediation of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for the same reason as the Project.

Therefore, the impact with respect to creating a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Response Plan

The Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies contained in the General Plan 2045 that further ensure adequate emergency access. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would be required to be consistent with existing regulations, including the MJHMP, and policies contained in the General Plan 2045 that further ensure adequate emergency access. As a result, the impact with respect to the impairment or interference with an adopted emergency response plan or emergency evacuation plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Wildland Fire Hazards

While the majority of the Planning Area is not within a VHFHSZ, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within West Los Angeles College and the IOF, as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Future development allowed under the Project could include the development of additional residential uses in these neighborhoods, which could expose additional people and structures to wildland fire hazards. The General Plan 2045 contains policies to minimize the risk of fire hazards. With adherence to applicable building codes and review by the CCFD to reduce fire hazards, the Project would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

Development allowed under Alternative 2 would also be required to adhere to building codes and review by the CCFD to reduce fire hazards. As a result, the impact with respect to wildland fire hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hydrology and Water Quality

Water Quality

The Project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, as future development under the Project would comply with applicable federal, state, and local regulations pertaining to water quality. In addition, the Project contains policies that promote improved water quality in the city and continued compliance with federal, state, and local water quality regulations, which would ensure that water quality is protected to the maximum extent practicable. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also adhere to applicable federal, state, and local regulations pertaining to water quality. Therefore, the impact with respect to water quality would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Groundwater

The City's water providers, LADWP and GSWC, use a combination of groundwater and surface water. There are limits on the amount of groundwater each provider can pump for potable water supplies, and the potential for overdraft is limited. These water providers would be able to utilize other sources of potable water to supplement a decrease in the amount of available groundwater, if needed. With regard to groundwater recharge, the General Plan 2045 establishes land use designations that encourage mixed uses and infill development, while maintaining existing parks and open space resources and expanding these resources. The Project would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. For these reasons, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also not substantially deplete groundwater supplies for the same reasons as the Project. As a result, the impact with respect to groundwater recharge would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Drainage

Implementation of the Project would not directly alter the course of Ballona Creek (a major drainage that flows through the Planning Area), or any other streams or rivers. In addition, future development under the Project would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the city's sewer system. For these reasons, the impact of the Project with respect to the alteration of drainage patterns would be less than significant.

Development allowed under Alternative 2 also would not directly alter the course of Ballona Creek or any other streams or rivers and would also be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the city's sewer system. Therefore, the impact with respect to drainage would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Inundation

The Planning Area is located approximately 1.5 miles inland from nearby coastal areas and is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the Planning Area with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, the majority of the Planning Area is located outside of a flood hazard zone. For these reasons, the risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for

the Planning Area. Additionally, future development facilitated under the Project would be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which would reduce the risk of onsite flooding and release of pollutants. Therefore, impacts associated with release of pollutants from inundation by flood, tsunami, or seiche would be less than significant.

Development allowed under Alternative 2 would also not result in impacts associated with release of pollutants from inundation by flood, tsunami, or seiche for the same reasons as the Project. As a result, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Water Quality Plan or Sustainable Groundwater Management Plan

Implementation of the Project would not degrade water quality due to compliance with all applicable federal, state, regional, and local water quality laws, regulations, and permits. Moreover, the General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the Planning Area, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable. In addition, implementation of the Project would not interfere with or conflict with the Santa Monica Groundwater Subbasin Groundwater Sustainability Plan (GSP), since the City is a member of the Santa Monica Basin Groundwater Sustainability Agency, and the Project includes various implementation actions that support the GSP. Furthermore, due to the developed nature of the city and the proposed land use distribution, impacts to groundwater supplies as a result of new impervious surfaces would be less than significant. Therefore, the Project would not conflict with the Santa Monica Subbasin GSP, and impacts would be less than significant.

Development allowed under Alternative 2 would not conflict with an applicable water quality plan or sustainable groundwater management plan for the same reasons as the Project. Therefore, the impact with respect to a water quality plan or sustainable groundwater management plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Land Use and Planning

Physically Divide a Community

The city is primarily built out with residential uses and only 0.6 percent is vacant land. Implementation of the Project would improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the city and the region. The overall land use pattern would not change under the General Plan 2045, and the changes focus density in areas that would not result in a division of a community. Therefore, future development allowed under the General Plan 2045 would not physically divide an established community, and the impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Mixed-use development along corridors under

Alternative 2 would foster more linkages and connectivity throughout the city. Moreover, the Planning Area is largely built out and new development would occur within areas that are already served by infrastructure, and thus development under Alternative 2 would not necessitate new roads or other infrastructure that would physically divide an established community. Therefore, the impact with respect to physically dividing an established community would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Consistency with Applicable Land Use Plans

The Project would not 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. The proposed General Plan Update is intended to provide a framework and vision to guide growth and development within the Planning Area, which includes the City's jurisdictional boundaries and its SOI, through the planning horizon year of 2045. The Zoning Code Update is the mechanism to implement the land use changes proposed in the City's General Plan Update. Implementation of the Project would not conflict with existing planning regulations and policies, including those included in California Government Code Section 65302, the California Complete Streets Act, the SCAG 2020–2045 RTP/SCS (Connect SoCal), the CCUSD Multi-Jurisdictional Hazard Mitigation Plan, the Culver City Bicycle & Pedestrian Action Plan, and the Culver City Urban Forest Master Plan. For these reasons, this impact would be less than significant.

Development allowed under Alternative 2 would also not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect for the same reasons as the Project. Therefore, the impact with respect to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Mineral Resources

Implementation of the Project would not result in the loss of availability of a known non-fuel mineral resource that would be of value to the region and residents of the State, nor would it create the loss of availability of a locally important mineral resource recovery site. No impact to aggregate mineral resources would occur with implementation of the Project. While there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which requires the closure of the City's portion of the IOF. Implementation of the Project would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation in a manner that would render the resources unavailable. As such, the Project would not result in the loss of a regionally and locally important mineral resource. Impacts related to oil and gas resources would be considered less than significant.

Development allowed under Alternative 2 would result in no impact to aggregate mineral resources for the same reason as the Project. Development allowed under Alternative 2 also would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation. Therefore, the impact with respect to oil and gas resources would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Noise and Vibration

Temporary or Permanent Increase in Ambient Noise Levels

Construction of future development under the Project would require the use of heavy equipment during construction activities. The exact locations of future projects and construction that would occur under the Project are not known at this time, though it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the City is generally built out. The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration and intensity of the activity. For future development projects requiring discretionary approval, a project-specific noise analysis would be prepared to determine significance and if necessary, recommend mitigation measures, in accordance with CEQA. Even with mandatory compliance with CCMC requirements, it is possible that some future development projects could be large in construction intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Implementation of Mitigation Measure MM NOI-1 would help to reduce the potentially significant construction-related impacts. However, even with implementation of Mitigation Measure MM NOI-1, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, it is possible that some future development under the Project could generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact. There are no feasible mitigation measures to reduce traffic noise levels. While General Plan Update policies would serve to limit traffic noise exposure to sensitive receptors, these policies cannot ensure that noise levels would be reduced to levels below the City's noise standards at all sensitive receptors. Therefore, traffic noise impacts under the Project would be significant and unavoidable.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Nonetheless, Alternative 2 would include the same policies and mitigation measure that address impacts related to noise and vibration as are found in the Project. Construction of future development allowed under Alternative 2, including discretionary development projects subject to CEQA review, could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with CCMC requirements, for the same reasons as the Project. Implementation of project-specific mitigation measures would help to reduce the potentially significant construction-related impacts. However, even with implementation of mitigation measures, impacts could exceed significance thresholds. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Future development projects under Alternative 2 could also generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact for the same reasons as the Project. As is the case for the Project, there are no feasible mitigation measures to reduce traffic noise levels. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Excessive Groundborne Vibration or Groundborne Noise

Some future development projects under the Project could generate construction-period groundborne vibration and groundborne noise levels that exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance and result in a significant impact. Even with implementation of Mitigation Measure MM NOI-2, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, future development projects under the Project could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. However, groundborne vibration and groundborne noise from operational sources would be characterized as typically low and would not be expected to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance. As a result, groundborne vibration and groundborne noise impacts during operation would be less than significant, and no mitigation is required.

Future development projects under Alternative 2 could also generate construction-period groundborne vibration and groundborne noise levels that exceed thresholds, even with implementation of mitigation measures, for the same reasons as the Project. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Impacts related to groundborne vibration and groundborne noise impacts during operation would be less than significant for the same reasons as the Project. Therefore, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Population and Housing

Induce Unplanned Population Growth

By virtue of the fact that the General Plan 2045 is the long-range blueprint for growth and development in the city, the population growth (both in housing and employment) anticipated to occur as a result of the Project would be considered planned growth. The General Plan 2045 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. Moreover, because the city has supported urban growth and development for more than 100 years and is served with infrastructure (e.g., roads, freeways, railroads, transit, water, sewer, storm drainage, electricity, natural gas, etc.) implementation of the Project would not result in indirect growth. Impacts would be less than significant. As such, the Project would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant.

As discussed above in Section 5.5.2, *Alternative 2 – Concentrated Growth Alternative*, the overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in

approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. As is the case for the Project, Alternative 2 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. As such, Alternative 2 would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Construction of New Housing

The Project would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. A substantial portion (approximately 29 percent) of developed land in the Planning Area consists of single-family residential uses, which are not anticipated to undergo significant land use changes under the Project. Proposed land use designations would introduce greater flexibility of uses, such as mixed-use, and allow residential uses in more areas of the city, including within industrial areas of the city. The City Council adopted the Culver City Housing Element 2021–2029 on August 8, 2022, and the Housing Element 2021–2029 was certified by HCD on October 10, 2022.⁷ The proposed Land Use Element reflects the new land use designations that would allow greater residential densities in order to meet the RHNA obligation for the 2021–2029 housing element cycle. In addition, the Housing Element includes an in-depth analysis of the city’s housing stock, past and anticipated trends, and housing needs that inform the element’s goals, policies, and programs, which include provisions to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the city’s fair share of the region’s housing need, preserve at-risk affordable housing units, and affirmatively further fair housing opportunities. The General Plan 2045 includes policies that support these objectives, including those that seek to ensure equity and protect diversity in Culver City’s communities. For these reasons, growth anticipated under the General Plan 2045 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

As previously discussed, the overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As is the case for the Project, Alternative 2 would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. As is the case for the Project, Alternative 2 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

⁷ Culver City, 2023. Housing Element Update Timeline. <https://www.pictureculvercity.com/housing-element/#updatetimeline>. Accessed April 2023.

Public Services

Fire and Police Service

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire and police service facilities, as future development would be concentrated in areas already well-served by existing fire and police facilities. In addition, the Project would promote compact development patterns through infill development, ensuring new development would be located within close proximity to existing fire stations and police stations. If new fire and police facilities are needed, the construction of these facilities would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. For these reasons, this impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. Nonetheless, as is the case for the Project, future development under Alternative 2 would be concentrated in areas already well-served by existing fire and police facilities, and if new fire and police facilities are required, the construction of these facilities would have minimal effects on the environment with compliance with existing regulations and proposed General Plan policies. In addition, as is the case for the Project, Alternative 2 promotes compact development patterns through infill development, ensuring new development would be located within close proximity to existing fire stations and police stations. For these reasons, this impact would be less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur, and there would be less demand for fire and police services under Alternative 2 compared to the Project.

Schools

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. The growth anticipated by the Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and anticipated school capacity. The CCUSD would continue to collect development impact fees throughout implementation of the Project, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per SB 50. For these reasons, this impact would be less than significant.

As less growth would occur under Alternative 2 compared to the Project, fewer students would attend local schools under Alternative 2 than under the Project. If new school facilities are required, the construction of these facilities would also have minimal effects on the environment with compliance with existing regulations and proposed General Plan policies under Alternative 2. In addition, all new development under Alternative 2 would also be required to pay school impact fees. Therefore, the impact with respect to schools would

remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for schools under Alternative 2 compared to the Project.

Parks

A comparison of impacts to parks and recreation facilities between the Project and Alternative 2 is provided below under “Recreation.”

Other Public Facilities

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, such as libraries, as the construction of these facilities, if needed, would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. As a result, this impact would be less than significant.

As less growth would occur under Alternative 2 compared to the Project, demand for other public facilities, such as libraries, would be less under Alternative 2 than under the Project. If new public facilities are required, the construction of these facilities would also have minimal effects on the environment with compliance with existing regulations and policies and proposed General Plan policies under Alternative 2. Therefore, the impact with respect to public facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 2 compared to the Project.

Recreation

Deterioration of Existing Recreational Facilities

Although the City is currently not meeting the park service ratio standard, the General Plan 2045 includes policies that would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, the Project would not 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. Impacts would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project.

As is the case for the Project, the General Plan 2045 under Alternative 2 includes policies that would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, Alternative 2 would not 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. Therefore, the impact with respect to substantial deterioration of existing recreational facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 2 compared to the Project.

Construction or Expansion of Recreational Facilities

The Project would encourage the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. The precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for future development projects or master/specific plans. Future recreational facilities would be consistent with the proposed land use designations and policies and would be subject to additional environmental review under CEQA, as needed. For these reasons, this impact would be less than significant.

As is the case for the Project, Alternative 2 encourages the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. As is the case for the Project, the precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for individual development projects or master/specific plans. Future recreational facilities would be consistent with the proposed land use designations and policies and would be subject to additional environmental review under CEQA, as needed. Therefore, the impact with respect to construction or expansion of recreational facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 2 compared to the Project.

Transportation

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle and pedestrian facilities due to the availability of non-vehicular transportation options for the community. In addition, policies included in the General Plan 2045 would balance the multimodal transportation network by providing alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Mixed-use development along corridors under Alternative 2 would foster more linkages and connectivity throughout the city. For the same reasons as the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle and pedestrian facilities due to the availability of non-vehicular transportation options for the community. As is the case for the Project, Alternative 2 would include the same policies included in the General Plan that would balance the multimodal transportation network by providing alternatives to the

automobile, improving transit service connections, and encouraging the use of alternative modes of transportation. Therefore, the impact with respect to conflict with adopted circulation program, plan, ordinance, or policy would remain less than significant, similar to the Project.

Vehicle Miles Traveled

The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) as total VMT per service population associated with growth under the General Plan 2045 would not achieve a 15 percent or more reduction compared to the baseline. Although policies promoting a reduction of VMT per capita are included in the General Plan 2045, no feasible mitigation is available to reach the 15 percent or more reduction threshold. As a result, this impact would be significant and unavoidable.

As less growth would occur under Alternative 2 compared to the Project, less traffic would be generated along streets in the Planning Area, and thus less VMT would be generated under the existing General Plan. However, this reduction in VMT under Alternative 2 would not likely be enough to achieve a 15 percent or more reduction compared to the baseline. As a result, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less as less traffic would be generated under Alternative 2 compared to the Project.

Design Hazards

The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses as access locations for future development would be designed to the City's standards and would provide adequate sight distance. In addition, policies included in the General Plan 2045 that promote bicycle and pedestrian safety would help identify and address potential safety concerns. Therefore, this impact would be less than significant.

Future development under Alternative 2 would also be designed in compliance with the City's standards for safety and would provide adequate sight distance. As a result, the impact with respect to design hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Access

Future development under the Project would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable. The City's development review process would ensure that future development under the Project would be consistent with these policies and would not hinder emergency access. For these reasons, the Project would not result in inadequate emergency access, and this impact would be less than significant.

Future development under Alternative 2 would also not result in inadequate emergency access for the same reason as the Project. Therefore, the impact with respect to emergency access would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Tribal Cultural Resources

No tribal cultural resources have been identified within or adjacent to the Planning Area. However, there are unevaluated prehistoric resources within the Planning Area that could be potential tribal cultural resources and, given the prehistoric occupation of the area, it is possible that future development under the Project may result in the identification of unrecorded tribal cultural resources. However, future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures, if necessary, are implemented to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Adherence to these regulations and implementation of General Plan policies would ensure that the Project's impact with respect to tribal cultural resources would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project although with greater amounts of mixed-use development throughout the city on corridors compared to the Project. Development under Alternative 2 may also result in the identification of unrecorded tribal cultural resources. However, future projects under Alternative 2 would also be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Therefore, the impact to tribal cultural resources is expected to be reduced to a less-than-significant level, similar to the Project.

Utilities and Service Systems

New or Expanded Facilities

The Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. However, future development under the Project could require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, and should upgrades to new facilities be required, the construction of those facilities could result in adverse environmental effects, which are considered throughout the technical sections of this Draft PEIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City

by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project.

Development allowed under Alternative 2 could also require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, and should upgrades to new facilities be required, the construction of those facilities could result in adverse environmental effects, which are considered throughout the technical sections of this Draft PEIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. As a result, this impact would be less than significant. For these reasons, the impact with respect to new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities under Alternative 2 would remain less than significant, similar to the Project.

Water Supply

Culver City is served by two water service providers: GSWC and LADWP. GSWC's 2020 UWMP and LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's and LADWP's water supply projections in their respective 2020 UWMPs are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the SCAG 2020–2045 RTP/SCS (Connect SoCal). As discussed in Section 4.18, the Project is consistent with the demographic projections in the 2020–2045 RTP/SCS, and there would be sufficient water supplies available to serve the Project. In addition, future development under the Project would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Future development under the Project would also adhere to policies in the General Plan 2045 aimed at reducing demand over time. Based on the above, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and water supply impacts would be less than significant.

Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. As less growth would occur under Alternative 2 compared to the Project, demand for water would be less than under the Project. As there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single dry, and multiple dry years, there would be sufficient water supplies available to serve Alternative 2 and reasonably foreseeable future development during normal, single dry, and multiple dry years. As is the case for the Project, future development under Alternative 2 would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Future development under Alternative 2 would also adhere to policies in the General Plan 2045 aimed at reducing demand over time. Consequently, impacts related to water supply would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 2.

Wastewater Service Capacity

The wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to future growth anticipated under the General Plan 2045. In addition, policies in the proposed General Plan Update aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. For these reasons, this impact would be less than significant.

As is the case for the Project, Alternative 2 would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments, as the wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to future growth anticipated under Alternative 2. In addition, policies in the proposed General Plan Update that would also be included under Alternative 2 aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. As a result, the impact with respect to wastewater service capacity under Alternative 2 would remain less than significant, similar to the Project.

Solid Waste

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, as the landfills that currently serve the city have adequate capacity to dispose of the full increase in solid waste attributable to future growth anticipated under the Project. In addition, compliance with existing solid waste regulations and policies in the proposed General Plan Update would further address potential impacts. Therefore, this impact would be less than significant.

As is the case for the Project, Alternative 2 would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, as the landfills that currently serve the city have adequate capacity to dispose of the full increase in solid waste attributable to future growth anticipated under Alternative 2. In addition, compliance with existing solid waste regulations and policies in the proposed General Plan Update that would also be included under Alternative 2 would further address potential impacts. As a result, the impact with respect to solid waste under Alternative 2 would remain less than significant, similar to the Project.

Solid Waste Regulations

The Project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. In addition, the policies in the proposed General Plan Update regarding solid waste disposal and associated public facilities would further ensure compliance with applicable regulations. As a result, this impact would be less than significant.

Development allowed under Alternative 2 would also comply with federal, state, and local management and reduction statutes and regulations related to solid waste. As a result, the impact with respect to solid waste regulations would remain less than significant, similar to the Project.

Wildfire

Emergency Response or Evacuation Plans

The Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies in the proposed General Plan Update that further ensure adequate emergency access. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As is the case for the Project, Alternative 2 would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies in the proposed General Plan Update that further ensure adequate emergency access. As a result, this impact would be less than significant, similar to the Project.

Exacerbate Wildfire Risks

While the majority of the Planning Area is not within a VHFHSZ, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Development associated with the Project would primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. If a fire were to occur in the more flat and urbanized areas of the Planning Area, the risk of the fire spreading rapidly would be less than in areas with steeper slopes. In addition, smoke from wildfires occurring in Los Angeles County and across the state has resulted in poor air quality within Culver City. Future development under the Project could exacerbate wildfire risks such that residents and occupants could be exposed to pollutant concentrations associated with smoke from a wildfire or the uncontrolled spread of wildfire. Compliance with the applicable requirements of the CBC, the CFC, the CCMC, the policies of the General Plan 2045, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant.

As development allowed under Alternative 2 would occur within the Planning Area Alternative 2 could also exacerbate wildfire risks as identified for the Project. As with the Project, required compliance with the applicable requirements of the CBC, the CFC, the CCMC, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant. Therefore, the impacts related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Infrastructure Which Could Exacerbate Fire Risk

The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the Project, including private and public improvements throughout the city, would generally occur in urban and developed areas that contain existing defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. However, If future development under the Project were to require the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, the construction or relocation of these facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. In addition, development allowed under the Project would occur in urbanized and developed areas where existing infrastructure, including highways and roadways, is already in place. The existing roadway patterns would be retained. While some modifications would occur to accommodate alternate modes of transportation, no new roadways are proposed. Compliance with CFC, CBC, and consistency with General Plan Update policies, as well as review of all new structures and private and public improvements by CCFD, would ensure that fire risks are not exacerbated. For these reasons, impacts related to infrastructure which could exacerbate fire risk would be less than significant.

As is the case for the Project, development of new or expanded infrastructure under Alternative 2 would also be subject to compliance with CFC, CBC, and consistency with General Plan Update policies, as well as review of all new structures and private and public improvements by CCFD. Therefore, the impacts related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Expose People or Structures to Significant Risks

Future development allowed under the Project would be subject to the applicable regulations and requirements of the CCMC as well as policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that the Project would not 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. Therefore, impacts related to exposure of people or structures to significant wildfire risks would be less than significant.

As is the case for the Project, development allowed under Alternative 2 would also be subject to the applicable regulations and requirements of the CCMC and applicable regulations regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that development allowed under Alternative 2 would not 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. Therefore, impacts related to exposure of people or structures to significant wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Relationship of the Alternative to the Project Objectives

As discussed above in Section 5.5.2, *Alternative 2 – Concentrated Growth Alternative*, the overall land use pattern under Alternative 2 would be similar to that for the Project. However, Alternative 2 would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. As shown in Table 5-1, Alternative 2 is projected to result in approximately 59,530 residents, 27,200 housing units, and 83,200 jobs in Culver City by 2045. Thus, Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. Alternative 2 would achieve all of the objectives for the Project. However, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

5.5.3 Alternative 3 – Modified Mixed Use High Designation Description of the Alternative

Alternative 3, the Modified Mixed Use High Designation Alternative, would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. As shown in Table 5-1, the Modified Mixed Use High Designation Alternative is projected to result in approximately 61,170 residents, 27,340 housing units, and 84,090 jobs in Culver City by 2045. Thus, Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project.

Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. The overall land use pattern under Alternative 3 would be similar to that for the Project. As with the Project, Alternative 3 would accommodate growth through infill development and redevelopment with growth occurring along corridors. Alternative 3 would incorporate mixed-use development on opportunity sites and in the industrial areas. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum floor area ratio (FAR)⁸ would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. In addition, with the reduction of residences there would be a reduction in the amount of incidental commercial floor area, thereby resulting in the reduction of approximately 210 jobs compared with the Project.

Under Alternative 3, the goals, policies, and implementation actions contained within the proposed General Plan elements would be applicable. Alternative 3 would include all of the mobility improvements as proposed for the Project throughout the planning horizon of 2045. As

⁸ Floor area ratio (FAR) is the ratio of a building's total floor area to the size of the piece of land upon which it is built. It is often used as one of the regulations in city planning and can refer to limits imposed on such a ratio through zoning.

with the Project, a Zoning Code Update for Alternative 3 would provide the development standards to implement the General Plan 2045.

Environmental Impacts

Aesthetics

Scenic Vistas

As discussed in Section 4.1, *Aesthetics*, of this Draft PEIR, the Project would not have a substantial adverse effect on a scenic vista, as land use designations under the proposed General Plan Update focus development toward portions of the Planning Area that are already developed, and thus would relieve pressure to develop in open space and natural areas. In addition, the Project includes several policies that would regulate scenic quality and resources. For these reasons, this impact would be less than significant. In addition, the Zoning Code Update, which is the implementation mechanism, would provide requirements for future development consistent with the General Plan goals and policies. The Zoning Code Update would provide the zoning districts associated with each of the land use designations in the General Plan 2045 and the specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights. As such, the Zoning Code Update would not result in a substantial adverse effect on a scenic vista. Future development would be reviewed by the City for compliance with applicable requirements and the mitigation measures referenced in other sections of this Draft PEIR. Therefore, impacts related to scenic vistas would be less than significant.

As with the Project, development under Alternative 3 would be directed toward portions of the Planning Area that are already developed and thus would relieve pressure to develop in open space and natural areas. The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, Alternative 3 would include the same policies that regulate scenic quality and resources as are found in the Project. Therefore, the impact with respect to scenic vistas would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Consistency with Applicable Zoning and Regulations Governing Scenic Quality

While the Project would result in an increase in densities and intensities of land uses, the majority of the proposed changes would occur within Culver City, with limited land use changes occurring within SOI. Proposed policies in the General Plan 2045 are intended to complement and improve the existing scenic quality and resources in the city as well as to implement the City's vision for the future character of the city. The Zoning Code Update would provide specific development standards, including permitted and conditional uses, densities, setbacks, lot coverage, and building heights consistent with the General Plan 2045. As such, the Zoning Code

Update would not conflict with the General Plan 2045 and other regulations governing scenic quality. Therefore, impacts would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Nonetheless, Alternative 3 would include the same policies that regulate scenic quality and resources as are found in the Project. Therefore, the impact with respect to consistency with applicable zoning and other regulations governing scenic quality would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Light and Glare

The Planning Area is urban in nature and thus, future development under the Project would primarily occur on parcels that contain uses that currently generate light and/or glare. While future development would include additional lighting and/or materials that could cause glare, the addition of these light and glare sources would be consistent with the existing urban environment and would replace the previous onsite light and glare sources. Therefore, any increase in ambient nighttime light conditions would not be substantial and would not be out of character with the urban environment. In addition, the General Plan 2045 includes policies related to buffering between uses and avoiding light spill and glare onto residential properties and sensitive habitats. Future development would be required to comply with applicable lighting regulations and standards in the CCMC. Therefore, impacts regarding light and glare that could affect day or nighttime views in the area would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Nonetheless, Alternative 3 would include the same policies related to buffering between development and sensitive habitats, and between future development and existing uses as are found in the Project. As is the case for the Project, adherence to design standards in the CCMC and policies in the General Plan 2045 would ensure that light and glare from future development and redevelopment projects facilitated under Alternative 3 would be minimized. Therefore, the impact with respect to light and glare that could affect day or nighttime views in the area would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Air Quality

Air Quality Plan

As discussed in Section 4.2, *Air Quality*, of this Draft PEIR, Culver City continues to coordinate with the SCAQMD and SCAG to ensure citywide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of future development under the proposed General Plan and Zoning Code Update would not conflict with or obstruct the implementation of the applicable air quality plan. Nonetheless, the growth projections under the Project would

exceed the current SCAG growth forecasts for Culver City; therefore, impacts would be significant. Implementation of Mitigation Measures MM AQ-1 through MM AQ-5 would serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development under the Project. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, impacts would remain significant and unavoidable.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Nonetheless, Alternative 3 would include the same policies that address air quality as are found in the Project. As shown in Table 5-1, the Modified Mixed Use High Designation Alternative is projected to result in approximately 61,170 residents, 27,340 housing units, and 84,090 jobs in Culver City by 2045. Thus, Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project. Similar to the Project, the growth projections contained in Alternative 3 would exceed the current SCAG growth forecasts for Culver City, although, by a slightly reduced margin than the Project. Similar to the Project, future development under Alternative 3 would be required to comply with applicable AQMP construction and operational control strategies. Therefore, the impact with respect to a conflict with the applicable air quality plan during construction and operation would be significant and mitigation would be required. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, the growth projections under the Alternative 3 would exceed the current SCAG growth forecasts for Culver City; therefore, impacts would remain significant and unavoidable, similar to the Project.

Criteria Pollutants

The Project could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment, as the construction and operation of individual future projects would generate emissions of criteria pollutants that could exceed regional significance thresholds. Even with the implementation of mitigation measures (MM AQ-1 and MM AQ-5), this impact would be significant and unavoidable.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Nonetheless, Alternative 3 would include the same policies that address air quality as are found in the Project. As shown in Table 5-1, the Modified Mixed Use High Designation Alternative is projected to result in approximately 61,170 residents, 27,340 housing units, and 84,090 jobs in Culver City by 2045. Thus, Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project. It is possible that Alternative 3 could result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment for the same reason as the Project. However, future development under Alternative 3 would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the

Project to reduce construction phase and operational emissions. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Substantial Pollutant Concentrations

The Project could expose sensitive receptors to substantial pollutant concentrations, as the construction and operation of individual future projects would generate emissions of nitrogen NOX, CO, PM10, and PM2.5 that could exceed localized significance thresholds established by the SCAQMD. In addition, the construction and operation of individual future projects could expose nearby sensitive receptors to levels of toxic air contaminants that could result in a potential increase in cancer, acute, and/or chronic risk. Even with the implementation of MM AQ-6 and MM AQ-7, this impact would be significant and unavoidable.

Alternative 3 could also expose sensitive receptors to substantial pollutant concentrations during construction and operation for the same reasons as the Project. Future development in the city would be required to comply with applicable SCAQMD rules and to implement similar mitigation as the Project to reduce localized air quality and health risk impacts. However, even with implementation of mitigation measures, impacts could exceed the significance thresholds. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Biological Resources

Special-Status Species

As discussed in Section 4.3, *Biological Resources*, of this Draft PEIR, the Project could have a substantial adverse effect on special-status plant and wildlife species that occur within the Planning Area. However, with adherence to proposed General Plan policies related to the protection of biological resources; compliance with all applicable laws, regulations, and ordinances related to the protection of special-status plant and wildlife species; and implementation of mitigation measures (MM BIO-1 and MM BIO-2), this impact would be reduced to a less-than-significant level.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Development allowed under Alternative 3 could also have a substantial adverse effect on riparian habitat or other sensitive natural communities that occur within the Planning Area. As is the case for the Project, development allowed under Alternative 3 would adhere to proposed General Plan policies related to the protection of biological resources; compliance with all applicable laws, regulations, and ordinances related to the protection of special-status plant and wildlife species; and implementation of mitigation measures (MM BIO-1 and MM BIO-2). Therefore, the impact to riparian habitat or other sensitive natural communities under Alternative 3 is expected to be reduced to a less-than-significant level, similar to the Project, and the severity of this impact would be similar.

Riparian Habitat or Sensitive Natural Habitat

Given the lack of any sensitive natural communities, including lack of riparian habitat, within the Planning Area, the Project would have no effect on these resources. Therefore, the Project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by CDFW or USFWS. The Project would have no impact.

Development allowed under Alternative 3 would also not have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS for the same reason as the Project. Therefore, as is the case for the Project, no impact would occur.

State or Federally Protected Wetlands

The Project would not have a substantial adverse effect on state or federally protected wetlands, as there are no wetlands present within the Planning Area. As a result, no impact would occur. In addition, the planned Ballona Creek Revitalization Project would enhance the restoration and use of Ballona Creek. Restoration activities may require Clean Water Act permits from the USACE and the RWQCB and/or a streambed alteration agreement from CDFW, which would be obtained prior to any work, and permit conditions would be implemented. Impacts would be less than significant.

Development allowed under Alternative 3 would also not have a substantial adverse effect on state or federally protected wetlands for the same reason as the Project. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Wildlife Corridors or Wildlife Nursery Sites

There are no wildlife corridors present within the Planning Area. Therefore, the Project would have no effect on wildlife corridors. In addition, nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where implementation of the General Plan 2045 could directly or indirectly impact these biological resources. Compliance with the General Plan 2045 goals and policies, the Zoning Code Update, the MBTA, and mitigation measure MM BIO-2 would ensure that impacts to nesting birds would be reduced to less than significant. Based on review of available information, no known non-avian wildlife nursery sites occur within the Planning Area.

Development allowed under Alternative 3 would also not have a substantial adverse effect on wildlife corridors or non-avian wildlife nursery sites for the same reason as the Project. Therefore, as is the case for the Project, no impact would occur.

Development allowed under Alternative 3 could also have a substantial adverse effect on nesting birds and/or nesting bird habitat that occur within the Planning Area for the same reasons as the Project. As is the case for the Project, compliance with the General Plan 2045 goals and policies, the Zoning Code Update, the MBTA, and mitigation measure MM BIO-2 would ensure that impacts to nesting birds under Alternative 3 would be reduced to less than

significant. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Conflict with Tree Preservation Policy or Ordinance

Future development facilitated by the Project would be subject to the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. In addition, proposed General Plan Update policies would serve to promote a strong urban forest across public and private properties and enhance tree health and appearance of streets and other public spaces through the regular maintenance as well as tree and landscaping planting and care of the existing canopy. Consistency with these policies would further ensure the impacts of the General Plan 2045 to existing and proposed tree resources would be minimized. Therefore, conflicts with local policies or ordinances protecting biological resources would not occur, and impacts would be less than significant.

Development allowed under Alternative 3 would also not conflict with a tree preservation policy or ordinance for the same reason as the Project. Therefore, the impact related to conflicts with local policies or ordinances protecting biological resources would not occur, and impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Cultural Resources

Historic Resources

As discussed in Section 4.4, *Cultural Resources*, of this Draft PEIR, future development under the General Plan 2045 may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. Even with adherence to the existing City Historic Preservation Ordinance, which outlines a designation process, criteria, and procedures for altering or modifying designated cultural resources; proposed General Plan policies related to the protection of cultural resources; and implementation of MM CUL-1, this impact would be significant and unavoidable.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, Alternative 3 would also adhere to the existing City Historic Preservation Ordinance and would include the same policies and mitigation measures that address potential effects to cultural resources as are found in the Project. Even with adherence to the existing City Historic Preservation Ordinance and proposed General Plan policies related to the protection of cultural resources and implementation of Mitigation Measure MM CUL-1, the impact related to a substantial adverse change in the significance of a historical resource under Alternative 3 would not be reduced to a less-than-significant level. As a result, this impact would be significant and unavoidable, similar to the Project.

Archaeological Resources

The Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Adherence to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction, implementation of MM CUL-2, and implementation of applicable policies in the General Plan 2045 would reduce the impact to a less-than-significant level.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Nonetheless, Alternative 3 would also adhere to the City's standard conditions of approval that require and specify steps to be taken to avoid damage and promote preservation of unknown archaeological resources uncovered during construction and would include the same policies and mitigation measures that address potential effects to archeological resources. Therefore, the impact related to archaeological resources would be less than significant, similar to the Project, and the severity of this impact would be similar.

Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Under the Project, energy use for construction of new developments would be for on-site activities and to transport construction materials and demolition debris as needed. In addition, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of new developments that could occur under the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant. With respect to operation, future development would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations. Therefore, future development under the Project would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during operation.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, Alternative 3 would include the same policies that address energy resources as are found in the Project. Alternative 3 would also not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction for the same reasons as the Project. As a result, the impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources during construction would remain less than significant, similar to the Project, and the

severity of this impact would be similar. With respect to operation, future development under Alternative 3 would be required to comply with applicable electric, natural gas, and transportation fuels control strategies, efficiency requirements, and regulations. Therefore, future development under Alternative 3 would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during operation, similar to the Project, and the severity of this impact would be similar.

Conflict with State or Local Renewable Energy Plan

Construction of development permitted by the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency as individual projects would utilize construction contractors who must demonstrate compliance with applicable regulations. In addition, truck fleet operators must upgrade their fleets with vehicles that meet adopted fuel-efficiency standards for medium- and heavy-duty trucks. With respect to operation, future development that could occur under the Project would be designed in a manner consistent with the policies contained in the proposed General Plan Update that are designed to encourage development that results in the efficient use of energy resources. Additionally, new development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. For these reasons, this impact would be less than significant.

Individual projects under Alternative 3 would also not conflict with or obstruct a state or local plan for renewable energy or energy efficiency for the same reasons as the Project. For these reasons, the impact would be less than significant, similar to the Project, and the severity of the impact would be similar.

Geology and Soils

Geologic Hazards

Future development under the Project would be required to comply with all applicable design, engineering, and construction standards and requirements of the California Building Code (CBC), the CMCC and policies contained in the proposed General Plan Update that are designed to minimize seismic-related geologic hazards. Therefore, the Project would not cause risk of loss, injury, or death associated with seismic hazards, including fault rupture, strong ground shaking, seismic-related ground failure, including liquefaction, or seismic-related landslides and slope instability. As a result, implementation of the Project would result in a less-than-significant impact related to risk of seismic-related geologic hazards.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, Alternative 3 would include the same policies that address

potential effects related to geology and soils as are found in the Project. As is the case for the Project, future development under Alternative 3 would be required to comply with all applicable design, engineering, and construction standards and requirements of the CBC, the CMCC, and policies contained in the proposed General Plan Update that are designed to further minimize seismic-related geologic hazards. Therefore, the impact with respect to risk of seismic-related geologic hazards would be less than significant, similar to the Project, and the severity of the impact would be similar.

Soil Erosion or Loss of Topsoil

The Project would not result in substantial soil erosion or the loss of topsoil, as future development that disturbs more than one acre would be required to comply with an NPDES permit, which would include implementation of BMPs and preparation of a SWPPP, which would include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. In addition, the proposed General Plan Update includes policies that encourage the use of BMPs to control soil erosion during and after ground-disturbing activities and the preparation of site-specific geotechnical investigations for projects requiring grading permits. As a result, this impact would be less than significant.

As is the case for the Project, future development under Alternative 3 that disturbs more than one acre would be subject to compliance with an NPDES permit and SWPPP and policies included in the General Plan 2045 that address impacts related to soil erosion or loss of topsoil. Therefore, the impact with respect to soil erosion or loss of topsoil would be less than significant, similar to the Project, and the severity of the impact would be similar.

Unstable and Expansive Soils

The Project would have a less-than-significant impact with respect to unstable soils, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and expansive soils. These potential hazards would be addressed largely through the integration of geotechnical information in the planning and design process in accordance with standard industry practices and state and local requirements. As a result, this impact would be less than significant.

As is the case for the Project, development allowed under Alternative 3 would be required to comply with all applicable design, engineering, and construction standards and requirements that address unstable or expansive soils. Therefore, the impact with respect to risk of unstable or expansive would be less than significant, similar to the Project, and the severity of the impact would be similar.

Paleontological Resources

Future development under the Project would not result in adverse impacts to paleontological resources, as the City's standard conditions of approval require specific steps to be taken to avoid damage and promote preservation of paleontological resources. In addition, proposed policies included in the General Plan 2045 promote public knowledge and protection of paleontological resources. Furthermore, MM GEO-1 would serve to further reduce impacts to paleontological resources by requiring that applicable future projects within the city would be subject to project-specific paleontological studies. As a result, this impact would be less than significant.

As is the case for the Project, development allowed under Alternative 3 would be required to comply with specific procedures in the City's entitlement process to avoid damage to paleontological resources and promote their preservation, as well as proposed General Plan policies that promote public knowledge and protection of paleontological resources, and the requirements of Mitigation Measure MM GEO-1. Therefore, impacts to paleontological resources would be less than significant, similar to the Project, and the severity of the impact would be similar.

Greenhouse Gas Emissions

Emissions

As discussed in Section 4.7, *Greenhouse Gas Emissions*, of this Draft PEIR, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction, as future projects developed under the Project would be required to comply with applicable federal, state, and local regulations that would reduce the amount of GHG emissions generated by construction equipment and activities. With respect to operation, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, as the net change in operational emissions from existing conditions compared to existing plus buildout under the Project would be negative compared to existing conditions. For these reasons, this impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. As is the case for the Project, Alternative 3 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction for the same reasons as the Project. Therefore, the impact with respect to the generation of GHG emissions during construction under Alternative 3 would remain less than significant, similar to the Project, and the severity of this impact would be similar. With respect to operation, as is the case for the Project, Alternative 3 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, as the net change in operational emissions from existing conditions compared to existing plus buildout of new development under Alternative 3 would be negative compared to existing conditions. For these reasons, this impact would be less than significant, similar to the Project, and the severity of this impact would be similar.

Conflict with Greenhouse Gas Reduction Plans, Policies, and Regulations

The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs as development that would occur under the Project would be consistent with applicable climate change scoping plan GHG reduction strategies. In addition, it is reasonable to expect the GHG emissions from future development anticipated by the Project would decline over time due to regulatory initiatives and technical innovations, and thus development permitted by the proposed General Plan Update would not conflict with or

interfere with the ability of the state to achieve its GHG reduction goal of 80 percent below 1990 levels by 2050 as stated in Executive Order S-3-05. In addition, the Project would be consistent with applicable SCAG 2020–2045 RTP/SCS (Connect SoCal) actions and strategies, which work to reduce GHG emissions generated by the transportation sector by aligning transportation, land use, and housing strategies. Finally, the development that would occur under the Project would be required to be consistent with the proposed Greenhouse Gas Reduction Element and with the City’s Green Building Program. For these reasons, this impact would be less than significant.

Development permitted under Alternative 3 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs for the same reasons as the Project. For these reasons, this impact would be less than significant, similar to the Project, and the severity of this impact would be similar.

Hazards and Hazardous Materials

Routine Use, Transportation, Disposal, or Accidental Release of Hazardous Materials

As discussed in Section 4.8, *Hazards and Hazardous Materials*, of this Draft PEIR, the Project would not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials, as the construction and operation of future development allowed under the Project would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also not create a significant hazard to the public or the environment through the routine use, transport, disposal, or accidental release of hazardous materials during construction and operation for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emit Hazardous Materials Within One-Quarter Mile of a School

The Project would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site, as existing and future development under the Project in the vicinity of an existing or proposed school site would adhere to applicable federal, state, and local regulations governing the transportation, use, handling, and disposal of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school site for the same reason as the Project. Therefore, the impact with respect to the transportation, use, handling, and disposal of hazardous materials would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hazardous Materials Sites

The Project would not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 as future development under the Project would adhere to applicable federal, state, and local regulations that provide procedures for the testing, handling, disposal, and remediation of hazardous materials. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also not create a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for the same reason as the Project. Therefore, the impact with respect to creating a significant hazard to the public or environment from a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Response Plan

The Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies contained in the General Plan 2045 that further ensure adequate emergency access. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would be required to be consistent with existing regulations, including the MJHMP, and policies contained in the General Plan 2045 that further ensure adequate emergency access. As a result, the impact with respect to the impairment or interference with an adopted emergency response plan or emergency evacuation plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Wildland Fire Hazards

While the majority of the Planning Area is not within a VHFHSZ, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within West Los Angeles College and the IOF, as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Future development allowed under the Project could include the development of additional residential uses in these neighborhoods, which could expose additional people and structures to wildland fire hazards. The General Plan 2045 contains policies to minimize the risk of fire hazards. With adherence to applicable building codes and review by the CCFD to reduce fire hazards, the Project would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

Development allowed under Alternative 3 would also be required to adhere to building codes and review by the CCFD to reduce fire hazards. As a result, the impact with respect to wildland fire hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Hydrology and Water Quality

Water Quality

As discussed in Section 4.9, *Hydrology and Water Quality*, of this Draft PEIR, the Project would not result in the violation of any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, as future development under the Project would comply with applicable federal, state, and local regulations pertaining to water quality. In addition, the Project contains policies that promote improved water quality in the city and continued compliance with federal, state, and local water quality regulations, which would ensure that water quality is protected to the maximum extent practicable. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also adhere to applicable federal, state, and local regulations pertaining to water quality. Therefore, the impact with respect to water quality would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Groundwater

The City's water providers, LADWP and GSWC, use a combination of groundwater and surface water. There are limits on the amount of groundwater each provider can pump for potable water supplies, and the potential for overdraft is limited. These water providers would be able to utilize other sources of potable water to supplement a decrease in the amount of available groundwater, if needed. With regard to groundwater recharge, the General Plan 2045 establishes land use designations that encourage mixed uses and infill development, while maintaining existing parks and open space resources and expanding these resources. The Project would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. For these reasons, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also not substantially deplete groundwater supplies for the same reasons as the Project. As a result, the impact with respect to groundwater recharge would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Drainage

Implementation of the Project would not directly alter the course of Ballona Creek (a major drainage that flows through the Planning Area), or any other streams or rivers. In addition, future development under the Project would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the city's sewer system. For these reasons, the impact of the Project with respect to the alteration of drainage patterns would be less than significant.

Development allowed under Alternative 3 also would not directly alter the course of Ballona Creek or any other streams or rivers and would also be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and

discharging into the city's sewer system. Therefore, the impact with respect to drainage would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Inundation

The Planning Area is located approximately 1.5 miles inland from nearby coastal areas and is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the Planning Area with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, the majority of the Planning Area is located outside of a flood hazard zone. For these reasons, the risk of release of pollutants as a result of inundation from being located in a flood, tsunami, or seiche zone would be considered extremely low for the Planning Area. Additionally, future development facilitated under the Project would be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which would reduce the risk of onsite flooding and release of pollutants. Therefore, impacts associated with release of pollutants from inundation by flood, tsunami, or seiche would be less than significant.

Development allowed under Alternative 3 would also not result in impacts associated with release of pollutants from inundation by flood, tsunami, or seiche for the same reasons as the Project. As a result, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Water Quality Plan or Sustainable Groundwater Management Plan

Implementation of the Project would not degrade water quality due to compliance with all applicable federal, state, regional, and local water quality laws, regulations, and permits. Moreover, the General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the Planning Area, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable. In addition, implementation of the Project would not interfere with or conflict with the Santa Monica Groundwater Subbasin Groundwater Sustainability Plan (GSP), since the City is a member of the Santa Monica Basin Groundwater Sustainability Agency, and the Project includes various implementation actions that support the GSP. Furthermore, due to the developed nature of the city and the proposed land use distribution, impacts to groundwater supplies as a result of new impervious surfaces would be less than significant. Therefore, the Project would not conflict with the Santa Monica Subbasin GSP, and impacts would be less than significant.

Development allowed under Alternative 3 would not conflict with an applicable water quality plan or sustainable groundwater management plan for the same reasons as the Project. Therefore, the impact with respect to a water quality plan or sustainable groundwater management plan would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Land Use and Planning

Physically Divide a Community

The city is primarily built out with residential uses and only 0.6 percent is vacant land. Implementation of the Project would improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the city and the region. The overall land use pattern would not change under the General Plan 2045, and the changes focus density in areas that would not result in a division of a community. Therefore, future development allowed under the General Plan 2045 would not physically divide an established community, and the impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. As is the case with the Project, the Planning Area is largely built out and new development would occur within areas that are already served by infrastructure, and thus development under Alternative 3 would not necessitate new roads or other infrastructure that would physically divide an established community. Therefore, the impact with respect to physically dividing an established community would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Consistency with Applicable Land Use Plans

The Project would not 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. The proposed General Plan Update is intended to provide a framework and vision to guide growth and development within the Planning Area, which includes the City's jurisdictional boundaries and its SOI, through the planning horizon year of 2045. The Zoning Code Update is the mechanism to implement the land use changes proposed in the City's General Plan Update. Implementation of the Project would not conflict with existing planning regulations and policies, including those included in California Government Code Section 65302, the California Complete Streets Act, the SCAG 2020–2045 RTP/SCS (Connect SoCal), the CCUSD Multi-Jurisdictional Hazard Mitigation Plan, the Culver City Bicycle & Pedestrian Action Plan, and the Culver City Urban Forest Master Plan. For these reasons, this impact would be less than significant.

Development allowed under Alternative 3 would also not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect for the same reasons as the Project. Therefore, the impact with respect to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Mineral Resources

Implementation of the Project would not result in the loss of availability of a known non-fuel mineral resource that would be of value to the region and residents of the State, nor would it create the loss of availability of a locally important mineral resource recovery site. No impact to aggregate mineral resources would occur with implementation of the Project. While there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which requires the closure of the City's portion of the IOF.

Implementation of the Project would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation in a manner that would render the resources unavailable. As such, the Project would not result in the loss of a regionally and locally important mineral resource. Impacts related to oil and gas resources would be considered less than significant.

Development allowed under Alternative 3 would result in no impact to aggregate mineral resources for the same reason as the Project. Development allowed under Alternative 3 also would not remove the existing IOF oil and gas resources nor change the City's IOF land use designation. Therefore, the impact with respect to oil and gas resources would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Noise and Vibration

Temporary or Permanent Increase in Ambient Noise Levels

Construction of future development under the Project would require the use of heavy equipment during construction activities. The exact locations of future projects and construction that would occur under the Project are not known at this time, though it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the City is generally built out. The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration and intensity of the activity. For future development projects requiring discretionary approval, a project-specific noise analysis would be prepared to determine significance and if necessary, recommend mitigation measures, in accordance with CEQA. Even with mandatory compliance with CCMC requirements, it is possible that some future development projects could be large in construction intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Implementation of Mitigation Measure MM NOI-1 would help to reduce the potentially significant construction-related impacts. However, even with implementation of Mitigation Measure MM NOI-1, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, it is possible that some future development under the Project could generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact. There are no feasible mitigation measures to reduce traffic noise levels. While General Plan Update policies would serve to limit traffic noise exposure to sensitive receptors, these policies cannot ensure that noise levels would be reduced to levels below the

City's noise standards at all sensitive receptors. Therefore, traffic noise impacts under the Project would be significant and unavoidable.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, Alternative 3 would include the same policies and mitigation measure that address impacts related to noise and vibration as are found in the Project. Construction of future development allowed under Alternative 3, including discretionary development projects subject to CEQA review, could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with CCMC requirements, for the same reasons as the Project. Implementation of project-specific mitigation measures would help to reduce the potentially significant construction-related impacts. However, even with implementation of mitigation measures, impacts could exceed significance thresholds. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Future development projects under Alternative 3 could also generate operational-period roadway traffic noise levels that exceed significance thresholds and result in a significant impact for the same reasons as the Project. As is the case for the Project, there are no feasible mitigation measures to reduce traffic noise levels. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Excessive Groundborne Vibration or Groundborne Noise

Some future development projects under the Project could generate construction-period groundborne vibration and groundborne noise levels that exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance and result in a significant impact. Even with implementation of Mitigation Measure MM NOI-2, impacts could exceed the significance thresholds and impacts would be significant and unavoidable.

With respect to operation, future development projects under the Project could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. However, groundborne vibration and groundborne noise from operational sources would be characterized as typically low and would not be expected to exceed the specified limits in the FTA Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance. As a result, groundborne vibration and groundborne noise impacts during operation would be less than significant, and no mitigation is required.

Future development projects under Alternative 3 could also generate construction-period groundborne vibration and groundborne noise levels that exceed thresholds, even with

implementation of mitigation measures, for the same reasons as the Project. Therefore, this impact would also remain significant and unavoidable, similar to the Project.

Impacts related to groundborne vibration and groundborne noise impacts during operation would be less than significant for the same reasons as the Project. Therefore, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Population and Housing

Induce Unplanned Population Growth

As discussed in Section 4.13, *Population and Housing*, of this Draft PEIR, by virtue of the fact that the General Plan 2045 is the long-range blueprint for growth and development in the city, the population growth (both in housing and employment) anticipated to occur as a result of the Project would be considered planned growth. The General Plan 2045 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. Moreover, because the city has supported urban growth and development for more than 100 years and is served with infrastructure (e.g., roads, freeways, railroads, transit, water, sewer, storm drainage, electricity, natural gas, etc.) implementation of the Project would not result in indirect growth. Impacts would be less than significant. As such, the Project would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant.

As discussed above in Section 5.5.3, *Alternative 3 – Modified Mixed Use High Designation*, the overall land use pattern under Alternative 3 would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. As shown in Table 5-1, the Modified Mixed Use High Designation Alternative is projected to result in approximately 61,170 residents, 27,340 housing units, and 84,090 jobs in Culver City by 2045. Thus, Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project. As is the case for the Project, Alternative 3 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. As such, Alternative 3 would not induce substantial unplanned population growth, either directly or indirectly. Impacts would be less than significant, similar to the Project, and the severity of this impact would be similar.

Construction of New Housing

The Project would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. A substantial portion (approximately 29 percent) of developed land in the Planning Area consists of single-family residential uses, which are not anticipated to undergo significant land use changes under the Project. Proposed land use designations would introduce greater flexibility of uses, such as mixed-use, and allow

residential uses in more areas of the city, including within industrial areas of the city. The City Council adopted the Culver City Housing Element 2021–2029 on August 8, 2022, and the Housing Element 2021–2029 was certified by HCD on October 10, 2022.⁹ The proposed Land Use Element reflects the new land use designations that would allow greater residential densities in order to meet the RHNA obligation for the 2021–2029 housing element cycle. In addition, the Housing Element includes an in-depth analysis of the city’s housing stock, past and anticipated trends, and housing needs that inform the element’s goals, policies, and programs, which include provisions to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the city’s fair share of the region’s housing need, preserve at-risk affordable housing units, and affirmatively further fair housing opportunities. The General Plan 2045 includes policies that support these objectives, including those that seek to ensure equity and protect diversity in Culver City’s communities. For these reasons, growth anticipated under the General Plan 2045 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

As previously discussed, the overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. As is the case for the Project, Alternative 3 would provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. As is the case for the Project, Alternative 3 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the impact would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Public Services

Fire and Police Service

As discussed in Section 4.14, *Public Services*, of this Draft PEIR, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire and police service facilities, as future development would be concentrated in areas already well-served by existing fire and police facilities. In addition, the Project would promote compact development patterns through infill development, ensuring new development would be located within close proximity to existing fire stations and police stations. If new fire and police facilities are needed, the construction of these facilities would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. For these reasons, this impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and

⁹ Culver City, 2023. Housing Element Update Timeline. <https://www.pictureculvercity.com/housing-element/#updatetimeline>. Accessed April 2023.

the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Nonetheless, as is the case for the Project, future development under Alternative 3 would be concentrated in areas already well-served by existing fire and police facilities, and if new fire and police facilities are required, the construction of these facilities would have minimal effects on the environment with compliance with existing regulations and proposed General Plan policies. In addition, as is the case for the Project, Alternative 3 promotes compact development patterns through infill development, ensuring new development would be located within close proximity to existing fire stations and police stations. For these reasons, this impact would be less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur, and there would be less demand for fire and police services under Alternative 3 compared to the Project.

Schools

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. The growth anticipated by the Project would likely result in the need for new or expanded public school facilities due to anticipated population growth and anticipated school capacity. The CCUSD would continue to collect development impact fees throughout implementation of the Project, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per SB 50. For these reasons, this impact would be less than significant.

As less growth would occur under Alternative 3 compared to the Project, fewer students would attend local schools under Alternative 3 than under the Project. If new school facilities are required, the construction of these facilities would also have minimal effects on the environment with compliance with existing regulations and proposed General Plan policies under Alternative 3. In addition, all new development under Alternative 3 would also be required to pay school impact fees. Therefore, the impact with respect to schools would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for schools under Alternative 3 compared to the Project.

Parks

A comparison of impacts to parks and recreation facilities between the Project and Alternative 3 is provided below under "Recreation."

Other Public Facilities

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, such as libraries, as the construction of these facilities, if needed, would be subject to compliance with existing regulations, proposed General Plan policies, and mitigation measures identified in other sections of this Draft PEIR to minimize adverse physical effects. As a result, this impact would be less than significant.

As less growth would occur under Alternative 3 compared to the Project, demand for other public facilities, such as libraries, would be less under Alternative 3 than under the Project. If new public facilities are required, the construction of these facilities would also have minimal effects on the environment with compliance with existing regulations and policies and proposed General Plan policies under Alternative 3. Therefore, the impact with respect to public facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 3 compared to the Project.

Recreation

Deterioration of Existing Recreational Facilities

As discussed in Section 4.15, *Recreation*, of this Draft PEIR, although the City is currently not meeting the park service ratio standard, the General Plan 2045 includes policies that would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, the Project would not 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. Impacts would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue.

As is the case for the Project, the General Plan 2045 under Alternative 3 includes policies that would reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, Alternative 3 would not 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. Therefore, the impact with respect to substantial deterioration of existing recreational facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 3 compared to the Project.

Construction or Expansion of Recreational Facilities

The Project would encourage the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. The precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for future development projects or master/specific plans. Future recreational facilities would be consistent with the proposed land use designations and policies and would be subject to additional environmental review under CEQA, as needed. For these reasons, this impact would be less than significant.

As is the case for the Project, Alternative 3 encourages the development of future recreational facilities in order to meet demand associated with anticipated population growth under the General Plan 2045. As is the case for the Project, the precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for individual development projects or master/specific plans. Future recreational facilities would be consistent with the proposed land use designations and policies and would be subject to additional environmental review under CEQA, as needed. Therefore, the impact with respect to construction or expansion of recreational facilities would remain less than significant, similar to the Project, although the severity of this impact would be less, as there would be less growth and less demand for these facilities under Alternative 3 compared to the Project.

Transportation

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy

As discussed in Section 4.16, *Transportation*, of this Draft PEIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle and pedestrian facilities due to the availability of non-vehicular transportation options for the community. In addition, policies included in the General Plan 2045 would balance the multimodal transportation network by providing alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. For the same reasons as the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle and pedestrian facilities due to the availability of non-vehicular transportation options for the community. As is the case for the Project, Alternative 3 would include the same policies included in the General Plan that would balance the multimodal transportation network by providing alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation. Therefore, the impact with respect to conflict with adopted circulation program, plan, ordinance, or policy would remain less than significant, similar to the Project.

Vehicle Miles Traveled

The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) as total VMT per service population associated with growth under the General Plan 2045 would not achieve a 15 percent or more reduction compared to the baseline. Although policies promoting a reduction of VMT per capita are included in the General Plan 2045, no feasible mitigation is available to reach the 15 percent or more reduction threshold. As a result, this impact would be significant and unavoidable.

As less growth would occur under Alternative 3 compared to the Project, less traffic would be generated along streets in the Planning Area, and thus less VMT would be generated under the existing General Plan. However, this reduction in VMT under Alternative 3 would not likely be enough to achieve a 15 percent or more reduction compared to the baseline. As a result, this impact would remain significant and unavoidable, similar to the Project, although the severity of this impact would be less as less traffic would be generated under Alternative 3 compared to the Project.

Design Hazards

The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses as access locations for future development would be designed to the City's standards and would provide adequate sight distance. In addition, policies included in the General Plan 2045 that promote bicycle and pedestrian safety would help identify and address potential safety concerns. Therefore, this impact would be less than significant.

Future development under Alternative 3 would also be designed in compliance with the City's standards for safety and would provide adequate sight distance. As a result, the impact with respect to design hazards would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Emergency Access

Future development under the Project would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable. The City's development review process would ensure that future development under the Project would be consistent with these policies and would not hinder emergency access. For these reasons, the Project would not result in inadequate emergency access, and this impact would be less than significant.

Future development under Alternative 3 would also not result in inadequate emergency access for the same reason as the Project. Therefore, the impact with respect to emergency access would remain less than significant, similar to the Project, and the severity of this impact would be similar.

Tribal Cultural Resources

No tribal cultural resources have been identified within or adjacent to the Planning Area. However, there are unevaluated prehistoric resources within the Planning Area that could be potential tribal cultural resources and, given the prehistoric occupation of the area, it is possible that future development under the Project may result in the identification of unrecorded tribal cultural resources. However, future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures, if necessary, are implemented to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Adherence to these regulations and implementation of General Plan

policies would ensure that the Project's impact with respect to tribal cultural resources would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. Development under Alternative 3 may also result in the identification of unrecorded tribal cultural resources. However, future projects under Alternative 3 would also be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction. Therefore, the impact to tribal cultural resources is expected to be reduced to a less-than-significant level, similar to the Project.

Utilities and Service Systems

New or Expanded Facilities

As discussed in Section 4.18, *Utilities and Service Systems*, of this Draft PEIR, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. However, future development under the Project could require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, and should upgrades to new facilities be required, the construction of those facilities could result in adverse environmental effects, which are considered throughout the technical sections of this Draft PEIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue.

Development allowed under Alternative 3 could also require or result in the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, and should upgrades to new facilities be required, the construction of those facilities could result in adverse environmental effects, which are

considered throughout the technical sections of this Draft PEIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. As a result, this impact would be less than significant. For these reasons, the impact with respect to new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities under Alternative 3 would remain less than significant, similar to the Project.

Water Supply

Culver City is served by two water service providers: GSWC and LADWP. GSWC's 2020 UWMP and LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's and LADWP's water supply projections in their respective 2020 UWMPs are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the SCAG 2020–2045 RTP/SCS (Connect SoCal). As discussed in Section 4.18, the Project is consistent with the demographic projections in the 2020–2045 RTP/SCS, and there would be sufficient water supplies available to serve the Project. In addition, future development under the Project would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Future development under the Project would also adhere to policies in the General Plan 2045 aimed at reducing demand over time. Based on the above, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and water supply impacts would be less than significant.

Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project. As less growth would occur under Alternative 3 compared to the Project, demand for water would be less than under the Project. As there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single dry, and multiple dry years, there would be sufficient water supplies available to serve Alternative 3 and reasonably foreseeable future development during normal, single dry, and multiple dry years. As is the case for the Project, future development under Alternative 3 would be required to address water supply as part of the entitlement process and would be required to comply with state and local regulations that promote water conservation, including CALGreen and CCMC Chapter 5.03, the City's Water Conservation Plan. Future development under Alternative 3 would also adhere to policies in the General Plan 2045 aimed at reducing demand over time. Consequently, impacts related to water supply would remain less than significant, similar to the Project, although the severity of this impact would be less, as less growth would occur under Alternative 3.

Wastewater Service Capacity

The wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to future growth anticipated under the General Plan 2045. In addition, policies in the proposed General Plan Update aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation

strategies, thus reducing demand for water, and in turn, the generation of wastewater. For these reasons, this impact would be less than significant.

As is the case for the Project, Alternative 3 would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments, as the wastewater treatment plant serving the Planning Area has sufficient remaining capacity to treat the full increase in sewage attributable to future growth anticipated under Alternative 3. In addition, policies in the proposed General Plan Update that would also be included under Alternative 3 aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. As a result, the impact with respect to wastewater service capacity under Alternative 3 would remain less than significant, similar to the Project.

Solid Waste

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, as the landfills that currently serve the city have adequate capacity to dispose of the full increase in solid waste attributable to future growth anticipated under the Project. In addition, compliance with existing solid waste regulations and policies in the proposed General Plan Update would further address potential impacts. Therefore, this impact would be less than significant.

As is the case for the Project, Alternative 3 would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, as the landfills that currently serve the city have adequate capacity to dispose of the full increase in solid waste attributable to future growth anticipated under Alternative 3. In addition, compliance with existing solid waste regulations and policies in the proposed General Plan Update that would also be included under Alternative 3 would further address potential impacts. As a result, the impact with respect to solid waste under Alternative 3 would remain less than significant, similar to the Project.

Solid Waste Regulations

The Project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. In addition, the policies in the proposed General Plan Update regarding solid waste disposal and associated public facilities would further ensure compliance with applicable regulations. As a result, this impact would be less than significant.

Development allowed under Alternative 3 would also comply with federal, state, and local management and reduction statutes and regulations related to solid waste. As a result, the impact with respect to solid waste regulations would remain less than significant, similar to the Project.

Wildfire

Emergency Response or Evacuation Plans

As discussed in Section 4.19, *Wildfire*, and Section 4.8, *Hazards and Hazardous Materials*, of this Draft PEIR, the Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies in the proposed General Plan Update that further ensure adequate emergency access. As a result, this impact would be less than significant.

The overall land use pattern under Alternative 3 would be similar to that for the Project. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. As is the case for the Project, Alternative 3 would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan, as future development under the Project would be required to be consistent with existing regulations, including the City's MJHMP, and policies in the proposed General Plan Update that further ensure adequate emergency access. As a result, this impact would be less than significant, similar to the Project.

Exacerbate Wildfire Risks

While the majority of the Planning Area is not within a VHFHSZ, CAL FIRE classifies the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods as a VHFHSZ. Currently, portions of the Culver Crest and Blair Hills neighborhoods that are within the VHFHSZ contain residential development. Development associated with the Project would primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. If a fire were to occur in the more flat and urbanized areas of the Planning Area, the risk of the fire spreading rapidly would be less than in areas with steeper slopes. In addition, smoke from wildfires occurring in Los Angeles County and across the state has resulted in poor air quality within Culver City. Future development under the Project could exacerbate wildfire risks such that residents and occupants could be exposed to pollutant concentrations associated with smoke from a wildfire or the uncontrolled spread of wildfire. Compliance with the applicable requirements of the CBC, the CFC, the CCMC, the policies of the General Plan 2045, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant.

As development allowed under Alternative 3 would also occur within the Planning Area Alternative 3 could also exacerbate wildfire risks as identified for the Project. As with the Project, required compliance with the applicable requirements of the CBC, the CFC, the CCMC, and site-specific recommendations identified prior to project approvals would ensure impacts related to exacerbating wildfire risks would be less than significant. Therefore, the impacts

related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Infrastructure Which Could Exacerbate Fire Risk

The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the Project, including private and public improvements throughout the city, would generally occur in urban and developed areas that contain existing defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. However, If future development under the Project were to require the relocation or construction of new or expanded water, stormwater drainage, electric power, natural gas, and telecommunications facilities, the construction or relocation of these facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. In addition, development allowed under the Project would occur in urbanized and developed areas where existing infrastructure, including highways and roadways, is already in place. The existing roadway patterns would be retained. While some modifications would occur to accommodate alternate modes of transportation, no new roadways are proposed. Compliance with CFC, CBC, and consistency with General Plan Update policies, as well as review of all new structures and private and public improvements by CCFD, would ensure that fire risks are not exacerbated. For these reasons, impacts related to infrastructure which could exacerbate fire risk would be less than significant.

As is the case for the Project, development of new or expanded infrastructure under Alternative 3 would also be subject to compliance with CFC, CBC, and consistency with General Plan Update policies, as well as review of all new structures and private and public improvements by CCFD. Therefore, the impacts related to exacerbating wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Expose People or Structures to Significant Risks

Future development allowed under the Project would be subject to the applicable regulations and requirements of the CCMC as well as policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that the Project would not 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. Therefore, impacts related to exposure of people or structures to significant wildfire risks would be less than significant.

As is the case for the Project, development allowed under Alternative 3 would also be subject to the applicable regulations and requirements of the CCMC and applicable regulations regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Furthermore, continued implementation of the City's MJHMP as well as review of development plans by CCFD would ensure that development allowed under Alternative 3 would not 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. Therefore,

impacts related to exposure of people or structures to significant wildfire risks would be reduced to a less-than-significant level, similar to the Project.

Relationship of the Alternative to the Project Objectives

As discussed above in Section 5.5.3, *Alternative 3 – the Modified Mixed Use High Designation Alternative*, the overall land use pattern under Alternative 3 would be similar to that for the Project. As is the case for the Project, Alternative 3 would accommodate growth through infill development and redevelopment with growth occurring along corridors. As is the case for the Project, Alternative 3 would incorporate mixed-use development on opportunity sites and in the industrial areas. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. In addition, with the reduction of residences there would be a reduction in the amount of incidental commercial floor area, thereby resulting in the reduction of approximately 210 jobs compared with the Project. Alternative 3 would achieve all of the objectives for the Project. However, Alternative 3 would not meet future needs based on the projected population and job growth to the same degree as the Project.

5.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. A comparative summary of the environmental impacts of the Project and of the alternatives is provided in **Table 5-2, Comparison of the Impacts of the Project and Alternatives**.

Alternative 1, the No Project Alternative, would be the continuation of growth in the city guided by the City’s adopted 1996 General Plan and the current Zoning Code. Alternative 1 would, in comparison to the Project, result in reduced environmental impacts related to air quality, biological resources, historic resources, GHG (emissions), noise, public services, recreation (construction or expansion of recreational facilities), transportation, utilities and service systems, and wildfire, but would result in greater impacts with respect to aesthetics, energy, GHG (conflict with applicable plans), land use and planning, and recreation (deterioration of existing recreational facilities). Alternative 1 would not meet most of the Project objectives and would not meet the underlying purpose of the Project.

**TABLE 5-2
COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES**

Impact	Project	Alternative 1: No Project Alternative	Alternative 2: Concentrated Growth Alternative	Alternative 3: Modified Mixed Use High Designation
Aesthetics				
AES-1: Substantial adverse effect on a scenic vista	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
AES-2: Conflict with applicable zoning and other regulations governing scenic quality	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
AES-3: Substantial light or glare	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
Air Quality				
AIR-1: Conflict with air quality management plan	Significant and Unavoidable	Less than Significant (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)
AIR-2: Cumulatively considerable increase of criteria pollutant in nonattainment area during construction and operation	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)
AIR-3: Exposure of sensitive receptors to substantial pollutant concentrations during construction and operation	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)
Biological Resources				
BIO-1: Candidate, sensitive, or special status species	Less than Significant with Mitigation	Less than Significant (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
BIO-2: Riparian habitat or sensitive natural habitat	No Impact	No Impact	No Impact	No Impact
BIO-3: State or federally protected wetlands	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
BIO-4: Wildlife corridors or wildlife nursery sites	Less than Significant with Mitigation	Less than Significant (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
BIO-5- Tree preservation policy or ordinance	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project Alternative	Alternative 2: Concentrated Growth Alternative	Alternative 3: Modified Mixed Use High Designation
Cultural Resources				
CUL-1: Historical resources	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Similar)	Significant and Unavoidable (Similar)
CUL-2: Archaeological resources	Less than Significant with Mitigation	Less than Significant (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
Energy				
ENG-1a: Cause wasteful, inefficient, or unnecessary consumption of energy during construction	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
ENG-1b: Cause wasteful, inefficient, or unnecessary consumption of energy during operation	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
ENG-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
Geology and Soils				
GEO-1: Geologic hazards	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-2: Soil erosion or loss of topsoil	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-3: Unstable soils	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-4: Expansive soils	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
GEO-5: Paleontological resources	Less than Significant with Mitigation	Less than Significant (Similar)	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)
Greenhouse Gas Emissions				
GHG-1: Generate emissions	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
GHG-2: Conflict with applicable plans	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
Hazards and Hazardous Materials				
HAZ-1: Routine transport, use, or disposal of hazardous materials	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project Alternative	Alternative 2: Concentrated Growth Alternative	Alternative 3: Modified Mixed Use High Designation
HAZ-2: Accidental release of hazardous materials into the environment	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-3: Emit hazards within on-quarter miles of an existing or proposed school	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-4: Hazardous materials sites	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-5: Adopted emergency response plan	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HAZ-5: Wildland fire hazards	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Hydrology and Water Quality				
HYD-1: Violate water quality standards or waste discharge requirements	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HYD-2: Groundwater supplies and groundwater recharge	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HYD-3: Substantially alter existing drainage pattern	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HYD-4: Release of pollutant from inundation by flood, tsunami, or seiche	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
HYD-5: Conflict with a water quality control plan or sustainable groundwater management plan	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Land Use and Planning				
LU-1: Physically divide a community	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
LU-2: Consistency with applicable land use plans	Less than Significant	Less than Significant (Greater)	Less than Significant (Similar)	Less than Significant (Similar)
Minerals				
MIN-1 and MIN-2: Known mineral resource, locally important mineral resource recovery site	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Noise				
NOI-1: Temporary or permanent increase in ambient noise levels during construction and operation	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)

Impact	Project	Alternative 1: No Project Alternative	Alternative 2: Concentrated Growth Alternative	Alternative 3: Modified Mixed Use High Designation
NOI-2a: Excessive groundborne vibration or groundborne noise during construction	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)
NOI-2b: Excessive groundborne vibration or groundborne noise during operation	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Population and Housing				
POP-1: Induce unplanned population growth	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
POP-2: Require construction of new housing	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
Public Services				
PS-1i: Fire protection	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)
PS-1ii: Police protection	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)
PS-1iii: Schools	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)
PS-1iv: Other public facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)
Recreation				
REC-1: Deterioration of existing recreational facilities	Less than Significant	Significant and Unavoidable (Greater)	Less than Significant (Less)	Less than Significant (Less)
REC-2: Construction or expansion of recreational facilities	Less than Significant	Less than Significant (Less)	Less than Significant (Less)	Less than Significant (Less)
Transportation				
TR-1: Conflict with plan, ordinance, or policy addressing circulation system, including transit, roadway, bicycle, and pedestrian facilities	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
TR-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3	Significant and Unavoidable	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)
TR-3: Increase hazards due to a geometric design feature or incompatible uses	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)

Impact	Project	Alternative 1: No Project Alternative	Alternative 2: Concentrated Growth Alternative	Alternative 3: Modified Mixed Use High Designation
TR-4: Inadequate emergency access	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Tribal Cultural Resources				
TCR-1: Change in the significance of a tribal cultural resource	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
Utilities and Service Systems				
UTL-1: New or expanded utility infrastructure	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
UTL-2: Water supplies	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
UTL-3: Wastewater treatment	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
UTL-4: Solid waste	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
UTL-5: Solid waste regulations	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
Wildfire				
WF-1: Emergency response or evacuation plans	Less than Significant	Less than Significant (Similar)	Less than Significant (Similar)	Less than Significant (Similar)
WF-2: Exacerbate wildfire risks	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
WF-3: Infrastructure which could exacerbate fire risk	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)
WF-4: Expose people or structures to significant risks	Less than Significant	Less than Significant (Less)	Less than Significant (Similar)	Less than Significant (Similar)

SOURCE: ESA, 2024.

Alternative 2, the Concentrated Growth Alternative, would be similar to the Project but would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. Therefore, under Alternative 2, the goals, policies, and implementation actions contained within the proposed General Plan elements would be applicable. Alternative 2 also includes all of the mobility improvements as proposed for the Project throughout the planning horizon of 2045. As with the Project, a Zoning Code Update for Alternative 2 would provide the development standards to implement the General Plan 2045. Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. Alternative 2 would, in comparison to the Project, result in reduced environmental impacts related to air quality, noise, public services, recreation, transportation, and utilities and service systems, primarily as a result of its reduction of growth in comparison to the Project. Alternative 2 would achieve all of the objectives for the Project. However, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Alternative 3, the Modified Mixed Use High Designation Alternative, would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. Under this alternative, all of the proposed elements of the General Plan 2045, except the proposed Land Use Element, would remain the same as under the Project. The overall land use pattern under Alternative 3 would be similar to that for the Project. As with the Project, Alternative 3 would accommodate growth through infill development and redevelopment with growth occurring along corridors. Alternative 3 would incorporate mixed-use development on opportunity sites and in the industrial areas. However, Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum FAR would decrease from 4.0 to 3.5. Alternative 3 would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project. Alternative 3 would, in comparison to the Project, result in reduced environmental impacts related to air quality, noise, public services, recreation, transportation, and utilities and service systems, primarily as a result of its reduction of growth in comparison to the Project. Alternative 3 would achieve all of the objectives for the Project. However, Alternative 3 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Alternative 2, the Concentrated Growth Alternative, is considered the environmentally superior alternative, as it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 3, as it would result in less development and associated physical impacts. However, as noted above, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

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CHAPTER 6

Other CEQA Considerations

This chapter addresses environmental topics required by the California Environmental Quality Act (CEQA) that are not covered within the other chapters of this Draft Program Environmental Impact Report (Draft PEIR), including: significant unavoidable impacts; irreversible environmental changes; growth inducing impacts; potential secondary effects related to Project mitigation measures; and environmental effects found not to be significant. In addition, reasons for implementation of the Project, notwithstanding potentially significant unavoidable impacts identified, are addressed in this chapter.

6.1 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. As indicated in Chapter 4, *Environmental Impact Analysis*, of this Draft PEIR, the Project would result in the following significant unavoidable impacts.

6.1.1 Air Quality

The Project would result in a potentially significant impact related to a conflict with or obstruction of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

The Project would result in a potentially significant impact related to a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

The Project would result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. While implementation of mitigation would help to reduce the severity of the effects, the impacts would remain significant and unavoidable.

6.1.2 Cultural Resources

The Project could cause a substantial adverse change in the significance of a historical resource pursuant CEQA Guidelines Section 15064.5 as it is reasonable to assume that some historical resources would be demolished or altered in an adverse manner over the lifetime of the General Plan 2045. While implementation of mitigation would serve to reduce the severity of the effects, the impacts would remain significant and unavoidable.

In addition, future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of historical resources, thus resulting in a potentially significant cumulative impact. Even with implementation of proposed General Plan 2045 policies, as well as applicable local, state, and federal laws and Mitigation Measure CUL-1, the Project's contribution to this potentially significant cumulative impact would be cumulatively considerable.

6.1.3 Noise

The Project would result in a potentially significant impact, as construction noise and traffic noise generated during the construction and operation of future development projects could exceed the significance thresholds. While implementation of mitigation would help to reduce the severity of noise during construction, the impacts during this phase would remain significant and unavoidable; no feasible mitigation is available to reduce the severity of traffic noise during operation, and thus impacts during this phase would continue to be significant and unavoidable.

The Project would result in a potentially significant impact, as vibration generated during the construction of future development projects could exceed the significance thresholds. While implementation of mitigation would reduce the severity of vibration during construction, the impact during this phase would remain significant and unavoidable.

In addition, the Project's contribution to cumulative construction and operational noise and vibration impacts would be cumulatively considerable.

6.1.4 Transportation

The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) in that the average daily VMT per Capita, Daily VMT per Employee, and total VMT per service population generated by the Project would exceed 15 percent below the corresponding City Baseline. As no feasible mitigation is available, the impact would be significant and unavoidable.

6.2 Reasons the Project is Being Proposed Notwithstanding its Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(c) of the State CEQA Guidelines requires a description of the reasons why a Project is being proposed, notwithstanding significant unavoidable impacts associated with the Project. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project. As discussed in Chapter 2, *Project Description*, of this Program EIR, the underlying purpose of the Project is to comprehensively update the General Plan to establish a long-range vision that reflects the unique needs of the City and provides clear direction to improve the quality of life for residents, businesses, and visitors. Thus, the General Plan 2045 establishes the long-range vision for the City and provides the goals and policies, which are steps to achieve the vision. The intent of the General Plan 2045 is to guide the physical growth of the city over the next two decades through the stated goals and policies, which are implemented by the Zoning Code Update.

As discussed above, the Project would result in significant and unavoidable impacts with respect to air quality, cultural resources, noise, and transportation. However, notwithstanding these significant and unavoidable environmental impacts, the Project is proposed so that the city has a comprehensive General Plan consisting of 13 elements that each focus on particular issues and provide strategies for sustainable future growth. The General Plan 2045 would guide the evolution of the land use pattern to accommodate growth through thoughtful infill development and redevelopment. For example, the Project provides the roadmap for the city to increase the housing supply and mix of housing types in an equitable manner. In addition, the Project would foster harmony between people and the environment through continued sustainability efforts in compliance with state requirements. The Project would achieve the following benefits:

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision through its policies;
- Guide decision-making related to development, housing, transportation, environmental quality, public services, parks, open space, and environmental justice;
- Help the City achieve compliance with applicable state and regional policies, including housing production and environmental regulations;
- Allow City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve environmental resources, and minimize hazards; and
- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance and future specific plans.

6.3 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires a discussion of a proposed project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This includes consideration of projects that would remove obstacles to population growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. Under CEQA, growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it can be demonstrated that the potential growth, in some other way, significantly affects the environment. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development);
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area);
- The project establishes a precedent-setting action that could lead to physical adverse changes in the environment (e.g., a change in zoning or general plan amendment approval);
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.).

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure, such as sewer and water facilities or roadways, or encourage premature or unplanned growth.

6.3.1 Population and Housing Growth

As discussed in Section 4.13, *Population and Housing*, of this Program EIR, Culver City's 2020 population was estimated to be 40,800 people. As part of the General Plan 2045 process, the City projects its 2045 population to be 62,400, which translates to an approximately 53 percent increase in growth over the next 25 years. Section 4.13 further states that existing land uses within the SOI are designated as open space, comprised of the IOF and West Los Angeles College, as well as a cemetery, and do not include any housing. Under the General Plan 2045, no significant land use changes would occur in the SOI and thus, would not generate any additional population or housing within the Planning Area. It should be noted that the General Plan 2045 is accommodating continued growth anticipated in the Planning Area and is not inducing growth.

As the potential growth in the city under the Project consists of infill development and new mixed-use opportunities in activity centers and along commercial corridors, the General Plan 2045 would not result in urbanization of land in remote locations. Development allowed under the Project would focus on redevelopment and revitalization of areas already served by infrastructure and would not require extensions of utilities, roads, or other infrastructure. As no new major roads or highways have been proposed to provide new access to the city, the

General Plan 2045 would not remove an impediment to growth. Instead, proposed development allowed under the Project would accommodate growth that will occur in the Southern California region, as anticipated by SCAG projections for the city in the next 25 years. Therefore, the General Plan 2045 would not be growth inducing or set new precedent for growth but would involve development in anticipation of expected growth in the city.

6.3.2 Removal of Obstacles to Population Growth

The Project encourages the reuse and intensification of previously developed areas of the city rather than the extension of urban development into undeveloped areas of the city. Development under the Project would occur for areas of the city that are developed and are served by an extensive network of roadways, electricity, water, sewer, storm drain and other infrastructure sized to accommodate or allow for existing and planned growth. Only minor connections would be needed to accommodate new development allowed under the Project. Since no new major roads or highways would be implemented to provide new access to the city, the General Plan 2045 would not facilitate development in any undeveloped areas where development could not already occur under existing City plans or ordinances. Instead, the Project focuses on infill development and mixed-use opportunities to provide higher density housing near transit, jobs, neighborhood amenities, and health care facilities. Therefore, the General Plan 2045 would not result in the removal of obstacles to growth that would result in growth-inducing development.

6.3.3 Employment Growth

Implementation of the Project would generate short-term employment opportunities during construction activities associated with future development. The General Plan 2045 would not be considered growth inducing as future development allowed under the Project would draw from the existing supply of construction workers in the Southern California workforce.

Implementation of the Project would contribute to permanent employment opportunities at commercial and industrial developments created along corridors and other large opportunity sites within the city. Potential full-time and part-time positions are anticipated to be filled by the local labor force. The jobs associated with the future proposed development could attract new residents to the city; however, Culver City has an existing employment base from which to pull employees. Furthermore, the economic expansion that would occur associated with future development is accounted for in the General Plan 2045 and is anticipated by the City. Therefore, impacts related to employment growth are not considered growth inducing.

6.3.4 Precedent-Setting Policies

The purpose of the Project is to preserve and enhance the character of Culver City and to establish long-range development policies that will guide future decision-making. Therefore, by its nature, the General Plan 2045 is designed to reduce the potential for uncontrolled growth and associated environmental impacts.

As described throughout this section, the anticipated growth under the Project would primarily consist of infill development and new mixed-use opportunities in activity centers and along commercial corridors within the city and would not result in the urbanization of land in remote locations. New development in the city would serve to accommodate imminent future growth in the Southern California region, as captured by SCAG projections for the city in the next 25 years. A general plan and zoning code are regulatory documents that plan for future growth and guide development. As such, the General Plan 2045 and Zoning Code Update would accommodate future growth and would reduce the potential for uncontrolled growth. Future, unanticipated actions, such as General plan amendments or changes to the zoning of individual properties, are in direct contrast to the General Plan 2045 process. Therefore, by accommodating growth that is already projected by SCAG, the Project would not be growth inducing or precedent setting.

6.4 Significant Irreversible Environmental Changes

According to Sections 15126(c) and 15126.2(d) of the State CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(d) indicates:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

The Project would allow for future development that would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of individual projects allowed under the Project and would continue throughout their operational lifetime. Development of individual projects allowed under the Project would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project sites. Construction of individual projects would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the project sites.

Ongoing operation of individual projects allowed under the Project would entail a further commitment of energy resources in the form of petroleum products, natural gas, electricity, and water. Long-term impacts would also result from an increase in vehicular traffic, and the associated air pollutant and noise emissions. This commitment of resources would be a long-

term obligation in view of the fact that, practically speaking, it would not be possible to return developed land to its original condition.

6.5 Potential Secondary Effects Related to Project Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) requires that if a mitigation measure proposed to address the significant effects of the Project would cause one or more significant effects in addition to those caused by the Project, the effects of the mitigation measure shall be discussed but, in less detail, than the significant effects of the Project. Accordingly, the mitigation measures proposed to address significant Project impacts were evaluated to determine if significant secondary impacts associated with their implementation would occur. The following provides a discussion of the subject areas in which mitigation measures are required, as well as any potential secondary significant effects that could occur as a result of their implementation. For the reasons stated below, implementation of the Project mitigation measures would not result in significant secondary impacts.

6.5.1 Air Quality

Mitigation Measures AQ-1 and AQ-2 require that construction contractors use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards and South Coast Air Quality Management District (SCAQMD) Low-VOC and/or Super-Compliant VOC architectural coatings and industrial maintenance coatings if future projects exceed SCAQMD significance thresholds during construction for emissions of NO_x, CO, PM₁₀, PM_{2.5} and/or Volatile Organic Compounds (VOCs).

For future projects that exceed SCAQMD significance thresholds during operation, Mitigation Measures AQ-3 through AQ-5 require that these projects to provide and/or install Energy Star-certified appliances or appliances of equivalent energy efficiency, electrical vehicle charging stations, and preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles.

These mitigation measures for air quality would implement emissions control strategies during construction and operation that would reduce impacts, and no further impacts would occur with their implementation. Therefore, these mitigation measures would not result in significant secondary impacts on the environment.

6.5.2 Biological Resources

Mitigation Measure BIO-1 would require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area to determine any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects.

For projects that are constructed during the nesting season, Mitigation Measure BIO-2 would require that a nesting bird and raptor survey be conducted within a 500-foot radius of a construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal, and if nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests.

These mitigation measures for biological resources would implement protection strategies during construction that would reduce impacts, and no further impacts would occur with their implementation. As a result, these mitigation measures would not result in significant secondary impacts on the environment.

6.5.3 Cultural Resources

Mitigation Measure CUL-1 requires that an historic resources assessment be conducted prior to development of any project within areas that contain properties more than 45 years old, and if any projects have the potential to result in direct and/or indirect effects on those resources, that recommendations in the assessment be followed to protect the significance of these resources.

Mitigation Measure CUL-2 requires that an archaeological resources assessment be conducted prior to development of any project that involves ground disturbance, and if resources are identified during the assessment, then their boundaries shall be determined, and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts to that resource.

The activities involved with assessing and protecting historic and archaeological resources would not require additional ground disturbance or cause changes in the physical environment. Therefore, these mitigation measures would not result in significant secondary impacts on the environment.

6.5.4 Geology and Soils – Paleontological Resources

Mitigation Measure GEO-1 requires that a paleontological resources assessment be conducted prior to development of any project that involves ground disturbance, and if resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, Society of Vertebrate Paleontology, and/or a local register. If a resource is determined to be significant and the project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the project to that resource. The mitigation measure would ensure that paleontological resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. Similar to the mitigation of historical and archaeological resources described above, the activities involved with assessing and protecting paleontological resources would not require additional ground disturbance or cause changes in the physical environment that would result in secondary impacts on the environment.

6.5.5 Noise

Implementation of Mitigation Measure NOI-1 would require applicants for new development projects that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) to prepare and submit a noise study that would include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards while implementation of Mitigation Measure NOI-2 would require applicants for new development projects located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) to prepare and submit a vibration impact evaluation that would include project-specific measures, if necessary, to ensure project compliance with vibration standards. Measures to reduce noise and vibration would likely involve control strategies for construction equipment that the Applicant would use or install, thus no further impacts would occur with this implementation. Therefore, these mitigation measures for construction noise would not result in secondary impacts on the environment.

6.6 Effects Found Not to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and were not discussed in detail in the Draft EIR. This section discusses those issue areas that were determined not to require further analysis in this Draft PEIR. For further discussion of these issues and more detailed evaluation of potential impacts found not to be significant refer to the Initial Study provided in Appendix A of this Draft PEIR.¹

6.6.1 Aesthetics

a) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Planning Area does not have any City- or State-designated scenic highways. As such, development allowed under the General Plan 2045 would not damage scenic resources located within the viewshed of a state scenic highway. No Project-specific and cumulative impacts would occur.

¹ The Initial Study that was prepared focused on the General Plan 2045. With the inclusion of the Zoning Code Update as part of the Project to maintain compliance with the recently adopted housing element and to comply with state law, the City issued a Recirculated NOP. Since the Zoning Code Update is the mechanism to implement the General Plan 2045, the Zoning Code Update is consistent with the density and intensity of development that would occur under the General Plan 2045. The Zoning Code Update is evaluated in each section of the Draft PEIR; the inclusion of the Zoning Code Update as part of the Project does not alter the conclusions in the Initial Study.

6.6.2 Agricultural and Forest Resources

- a) Would the project 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?**

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. Furthermore, the Project does not identify any areas within the Planning Area as designated for agriculture use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses and no impacts would occur.

- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

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 Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impacts would occur.

- c) Would the project conflict with existing zoning for, or cause rezoning of, forestland (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))?**

As discussed above, the majority of the Planning Area is highly urbanized. No forest land or timberland zoning is present within the Planning Area. As such, the Project would not conflict with existing zoning for forest land or timberland and no impacts would occur.

- d) Would the project result in the loss of forestland or conversion of forestland to non-forest uses?**

No forest land exists within the Planning Area. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impacts would occur.

- e) Would the project 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 forestland to non-forest use?**

No agricultural uses or forestlands exist within the Planning Area. As such, the General Plan 2045 would not involve converting farmland to other uses, either directly or indirectly and no impacts would occur.

6.6.3 Air Quality

a) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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 to 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. Project-specific and cumulative impacts would be less than significant.

6.6.4 Biological Resources

a) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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. No Project-specific and cumulative impacts would occur.

6.6.5 Cultural Resources

a) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Development allowed under the Project 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. Project-specific and cumulative impacts would be less than significant.

6.6.6 Geology and Soils

- a) **Would the project 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?**

The Planning Area is served by municipal wastewater infrastructure. Development allowed under the Project 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. No impacts would occur.

6.6.7 Hazards and Hazardous Materials

- a) **Would the project be 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?**

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 Planning Area 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.

6.6.8 Noise

- a) **Would the project be 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, and expose people residing or working in the Project area to excessive noise levels?**

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, development facilitated by the Project would not expose people to excessive noise levels from such uses. No impacts would occur.

CHAPTER 7

References

As part of the General Plan Update process, the City prepared 13 Existing Conditions Reports, which can be found on the City’s website at <https://www.pictureculvercity.com/existing-conditions-reports>. The Reports addressed different topics, including an Environmental Background Report; a Parks, Public Facilities, and Public Services; and Infrastructure. The Existing Conditions Reports provided baseline information and identified issues and opportunities, which were used to inform the preparation of the Draft General Plan Update. Information contained in the Existing Conditions Reports was used in the preparation of the Program EIR.

In addition, the following provides the references that were used for each of the chapters and sections in the Program EIR.

Project Description

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