

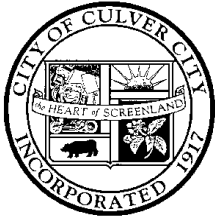
Appendix A  
**Notice of Preparation, Initial  
Study, and Scoping Comments  
and Responses**



# **A-1 NOP and Recirculated NOP**







LAUREN MARSIGLIA  
Interim Advance Planning  
Manager

# Culver CITY

## ADVANCE PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

(310) 253-5710

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253-5721

## NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND EIR SCOPING MEETING

### PICTURE CULVER CITY: GENERAL PLAN 2045

**NOTICE IS HEREBY GIVEN** to all responsible agencies and interested parties that the City of Culver City (City), as the Lead Agency, will be preparing an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082. This Notice of Preparation (NOP) has been prepared to describe the Picture Culver City: General Plan 2045 (GPU) and identify the scope of environmental issues recommended to be addressed in the EIR, and to seek your comments on what environmental effects and alternatives the EIR should study. You are being notified of the City's intent, as Lead Agency, to prepare an EIR for the GPU, as it is located in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by consultants under direction of the City and submitted to the Advance Planning Division for independent review and certification.

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**PROJECT TITLE:** Picture Culver City: General Plan 2045  
**APPLICANT/OWNER:** City of Culver City, Advance Planning Division  
**PROJECT ADDRESS:** City of Culver City and Sphere of Influence (SOI)  
**DUE DATE FOR PUBLIC COMMENTS ON THE NOP:** 5:30 PM on Monday, April 4, 2022  
**EIR SCOPING MEETING:** 6 PM–7 PM on Thursday, March 24, 2022

**PROJECT LOCATION:** The City of Culver City is located in the southern part of Los Angeles County. The city comprises about 5 square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary. The Planning Area for the GPU includes land within the City's jurisdictional boundaries and its SOI. The Planning Area covers about 3,910 acres, of which about 3,280 acres (84 percent) is within city limits and about 630 acres (16 percent) is in unincorporated Los Angeles County adjacent to the city. See Figure 1, GPU Planning Area, attached.

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

**ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIR:** Based on an Initial Study, the Culver City Advance Planning Division has determined that an EIR will be required to analyze the GPU's environmental effects. Environmental issues identified as having the potential to result in significant impacts that require further evaluation in the EIR include: Air Quality (all but odors), Biological Resources, Cultural Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. The Initial Study is available for review on the Culver City website (<https://www.culvercity.org/Have-Your-Say/A-Picture-Culver-City-General-Plan-2045>), or City Hall at the Planning Division counter, and the Culver City Julian Dixon Library.

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**PUBLIC COMMENT PERIOD FOR NOP:** The Advance Planning Division welcomes and will consider all comments regarding the potential environmental impacts of the General Plan 2045 and issues and alternatives to be addressed in the EIR. All comments will be considered in preparation of the EIR. The comment period for the NOP begins on **Thursday, March 3, 2022 and ends on Monday, April 4, 2022.** Written comments should be received on or before **Monday, April 4, 2022 at 5:30 PM** Written comments should refer to the Picture Culver City: General Plan 2045 and be addressed to:

Lauren Marsiglia, Interim Advance Planning Manager  
City of Culver City Advance Planning Division  
9770 Culver Boulevard, Culver City, CA 90232  
Phone: (310) 253-5740 E-mail: [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org)

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**EIR SCOPING MEETING:** A virtual EIR Scoping Meeting will be held on **Thursday, March 24, 2022.** In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meeting will be held in an online format using Zoom to share information regarding the GPU and the environmental review process. You may join, view, and participate in the meeting by using the Zoom application, by your web browser, or by phone. Register for the virtual meeting by visiting: <http://bit.ly/GP2045ScopingMeeting>. This will provide you with a confirmation, join link, and call-in numbers. City staff and environmental consultants will be available during this meeting. The meeting will begin with a presentation and be followed by a question and answer session. The meeting will be open to the public and all stakeholders. Questions may be submitted via e-mail before the meeting at [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org). However, attendees will have opportunities to ask questions during the meeting. A separate, more detailed instructions page is included in this notice.

***The EIR Scoping Meeting will begin at 6 PM and end at around 7 PM.***

Copies of the documentation can be reviewed online using the above link, or by requesting copies from the Advance Planning Division Office, City Hall, Third Floor, 9770 Culver Boulevard, Culver City, CA 90232-0507 (handicapped accessible location). City Hall business hours are 7:30 AM – 5:30 PM, Monday through Friday, except alternate Fridays. Please call beforehand to assure staff availability at (310) 253-5740.

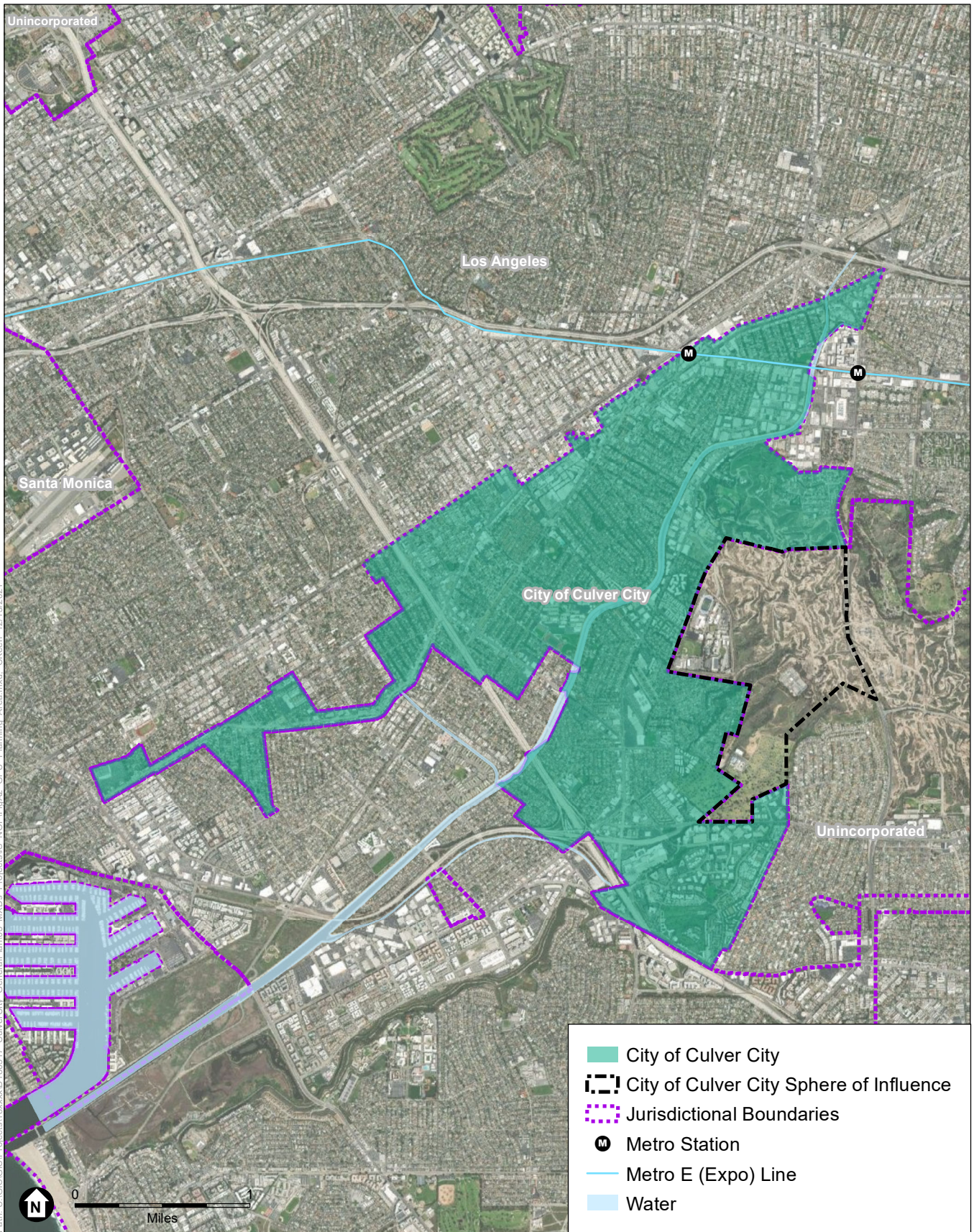


Lauren Marsiglia, Interim Advance Planning Manager

March 1, 2022

Date





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

Culver City General Plan Update

**Figure 1**  
GPU Planning Area



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## Picture Culver City: General Plan 2045 EIR Scoping Meeting

# Virtual Meeting Instructions

A virtual EIR Scoping Meeting will be held on the Picture Culver City: General Plan 2045 (GPU) and the scope of environmental documentation on **Thursday, March 24, 2022**. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe the EIR should address.

The virtual EIR Scoping Meeting will be held online using Zoom to share information regarding the GPU and the environmental review process. City staff and environmental consultants will be available during this meeting, which will begin with a presentation, followed by a question and answer session. The meeting will be open to the public and all stakeholders.

**Questions may be submitted via email before the meeting at [advance.planning@culvercity.org](mailto:planning@culvercity.org). However, attendees will have opportunities to ask questions during the meeting.**

**The EIR Scoping Meeting will be from 6 – 7 PM.**

### How to Participate

See the instructions below on how to join, view, and participate in the virtual Zoom meeting by your web browser or by phone. The instructions below also explain how to verbally comment during the meeting and how to receive tech support before and during the virtual meeting.

Register for the virtual meeting through Zoom by visiting: <http://bit.ly/GP2045ScopingMeeting>. This will provide you with a confirmation, join link, and call-in numbers.

### Joining the EIR Scoping Meeting

#### *Zoom Application (Preferred Method)*

- For the best experience, download and install Zoom on your computer before the meeting begins. You can download the Zoom software for free before or at the moment you join the meeting at <https://zoom.us/download>.

#### *Zoom Through Web Browser*

- You do NOT need to install Zoom software on your computer to participate and provide comments. When you click on the meeting link provided at registration a new browser tab or window will open (depending on your browser settings). To join the meeting, click the link near the bottom of the window that states “start from your browser”. We recommend that you use either Google Chrome, Safari, or Firefox as your web browser.

#### *Join by Phone*

- **Dial:** [ADD DIAL IN]
- **Webinar ID:** [ADD WEBINAR ## IN]
- **Phone Shortcuts:**
  - \*6 to mute and unmute yourself
  - \*9 to raise your hand
- Note: if you are calling into the meeting, you will not be able to see the visual content presented, but you can listen and participate. Copies of the presentation will be provided on the City’s website after the meeting.

## Providing Verbal Comments

As you enter the Zoom meeting, you will automatically be muted. To speak during the session, you will need to virtually raise your hand and a moderator will unmute you. Here's how to raise your hand and speak during the meeting:

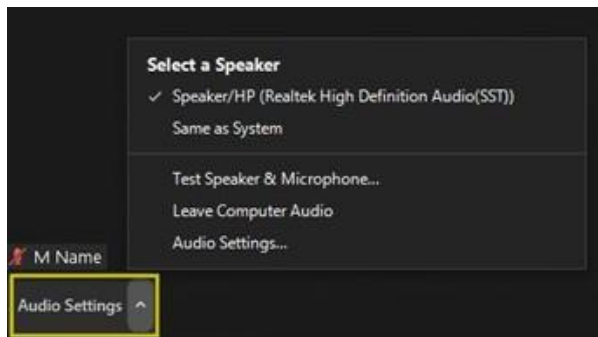
1. Mouse over the bottom of the **Zoom** application and locate the **hand icon**.
2. Select the **hand icon** to virtually raise your hand or **dial \*9** if you are joining by phone.
3. A moderator will call your name and unmute you to speak.

Once you have been called, your hand will be lowered. If you would like to speak again, press the **hand icon** or **dial \*9** to be placed back in the queue.



## Audio Check

We encourage you to test your audio connection before joining the meeting. Click the “Audio Settings” on the lower left corner of your screen and make sure the microphone and speaker are assigned to the correct device. You also can do your audio check while you are waiting for the meeting to start.



## Tech Support

To provide a seamless experience for all users, there will be tech support before and during the virtual meeting . If you have issues before and would like assistance, please email [meetingsupport@esassoc.com](mailto:meetingsupport@esassoc.com).

Technical support will also be available during the virtual meeting. To contact support during the meeting, send a message to the support team using the chat feature. Someone will contact you separately to resolve the issue.



## **A-2 Initial Study**







# Culver CITY

## ADVANCE PLANNING DIVISION

(310) 253-5710  
FAX (310) 253-5721

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

## INITIAL STUDY

**Project Title:** Picture Culver City: General Plan 2045

**Project Record Number:** P2022-0053-GPE

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

**Project Sponsor:** City of Culver City

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

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

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

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

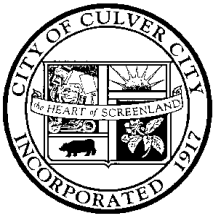
**City of Culver City, Advance Planning Division, 3<sup>rd</sup> Floor  
9770 Culver Boulevard, Culver City, CA 90232**

**[www.culvercity.org](http://www.culvercity.org)**

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

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





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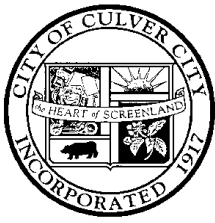
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## ADVANCE PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

### INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

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

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**ENVIRONMENTAL DETERMINATION:**

On the basis of this initial evaluation:

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

*Laura Mangini*

Interim Advance Planning Manager, City of Culver City

March 1, 2022

Date

## PURPOSE OF THE INITIAL STUDY:

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

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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



| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**I. AESTHETICS** – Except as provided in Public Resource Code Section 21099, would the Project:

|  |                                     |                          |                          |                                     |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

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

Would the Project:

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

| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**III. AIR QUALITY** – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the Project:

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

**IV. BIOLOGICAL RESOURCES** – Would the Project:

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

| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**V. CULTURAL RESOURCES** – Would the Project:

|   |                                     |                          |                                     |                          |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                          | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**VI. ENERGY** – Would the Project:

|   |                                     |                          |                          |                          |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**VII. GEOLOGY AND SOILS** – Would the Project:

|  |                                     |                          |                          |                                     |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:   |                                     |                          |                          |                                     |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| ii) Strong seismic ground shaking?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| iv) Landslides?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Result in substantial soil erosion or the loss of topsoil?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**VIII. GREENHOUSE GAS EMISSIONS – Would the Project:**

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

**IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:**

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

**X. HYDROLOGY AND WATER QUALITY – Would the Project:**

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

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

**XI. LAND USE AND PLANNING** – Would the Project:

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

**XII. MINERAL RESOURCES** – Would the Project:

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

**XIII. NOISE** – Would the Project result in:

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

| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**XIV. POPULATION AND HOUSING – Would the Project:**

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

**XV. PUBLIC SERVICES**

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

**XVI. RECREATION**

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

**XVII. TRANSPORTATION – Would the Project:**

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

| Issues: | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact |
|---------|--------------------------------------|--|------------------------------------|--------------|
|---------|--------------------------------------|--|------------------------------------|--------------|

**XVIII. TRIBAL CULTURAL RESOURCES**

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

|                                     |                          |                          |                          |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:**

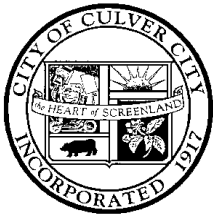
- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b) Have sufficient water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

|                                     |                          |                          |                          |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

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





## ATTACHMENT A PROJECT DESCRIPTION

### A. INTRODUCTION

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

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

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

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

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

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

## B. PROJECT LOCATION

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

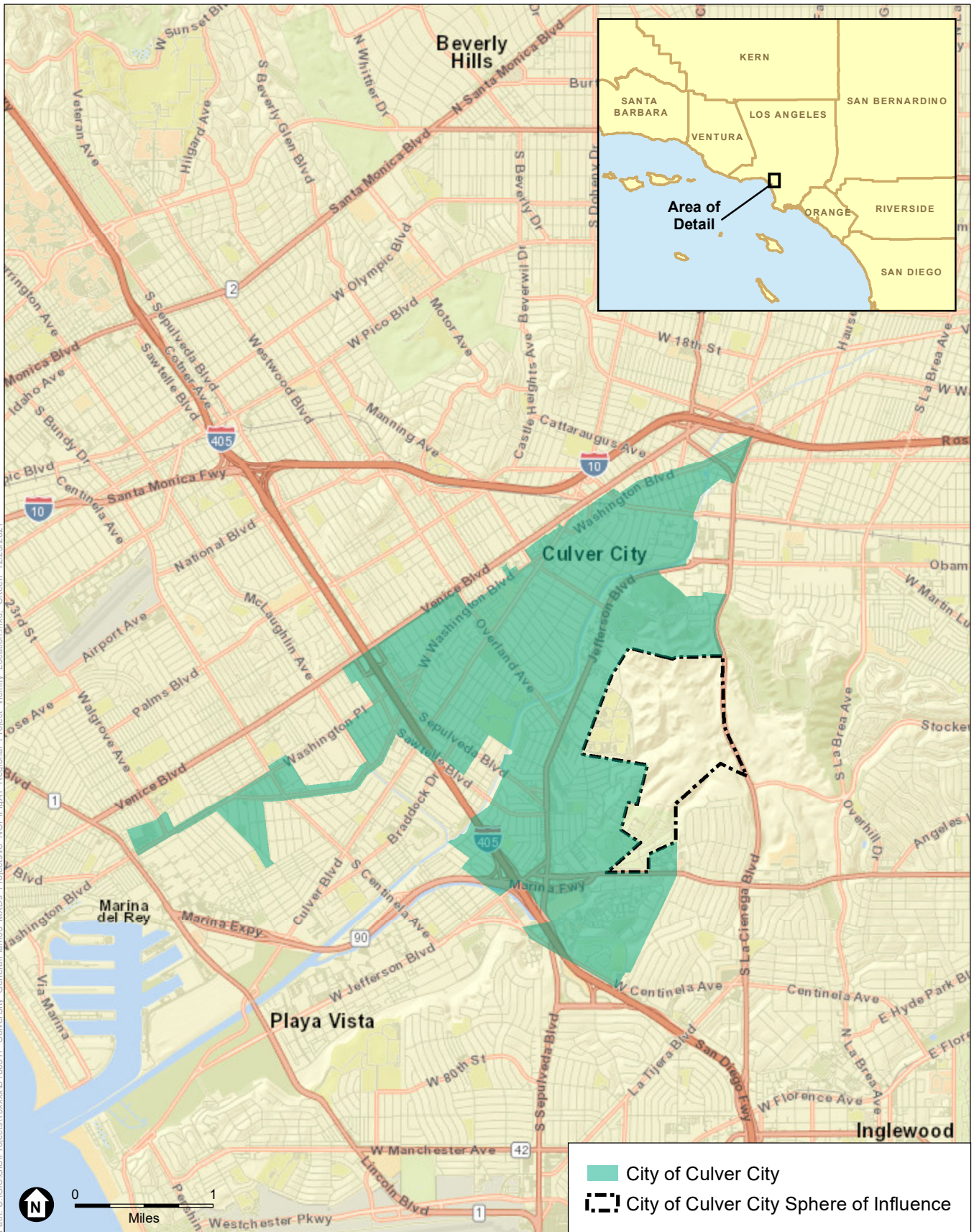
## C. PLANNING AREA

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

## D. EXISTING CONDITIONS AND LAND USE

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

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



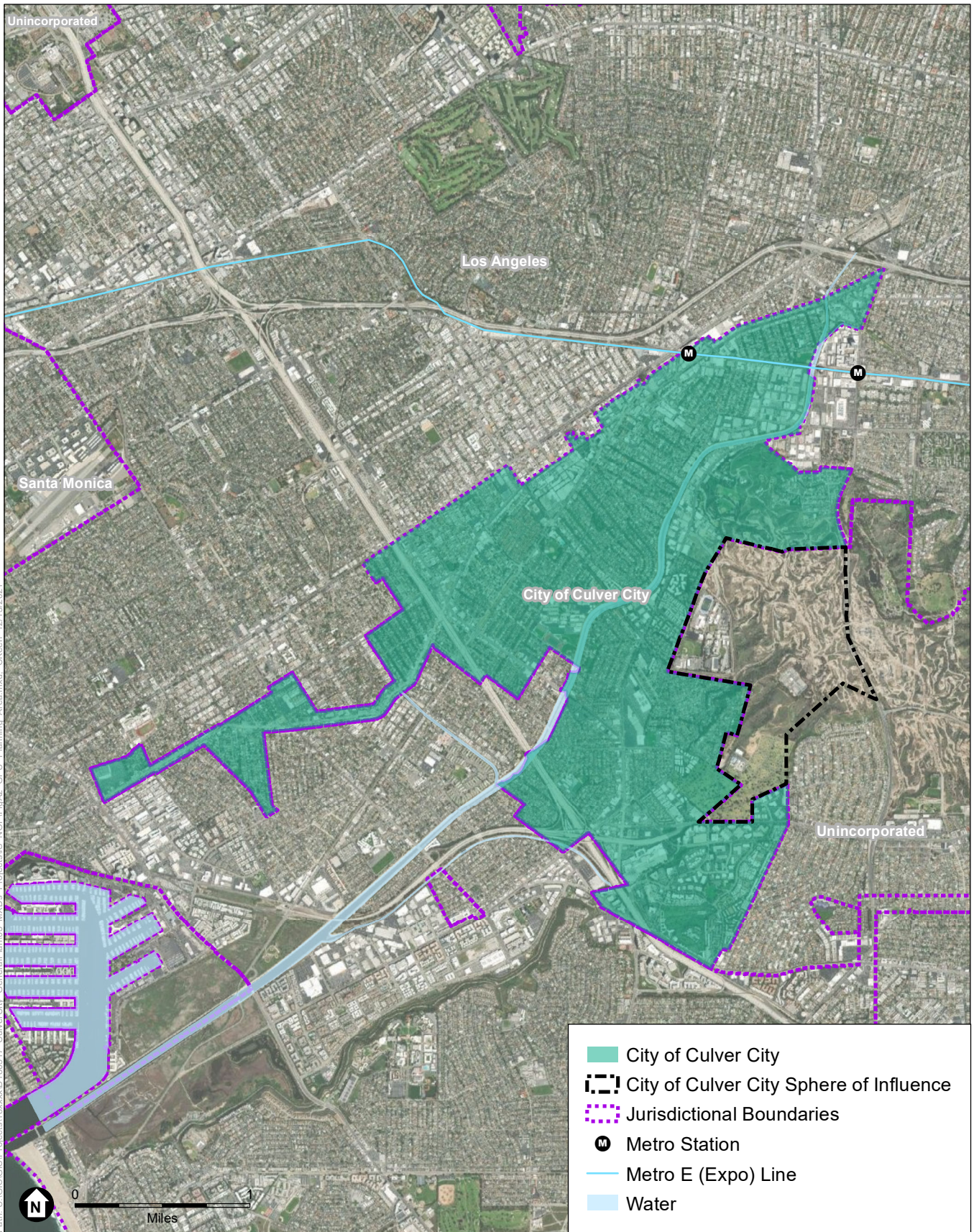
SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

**Figure A-1**  
Regional and Project Vicinity





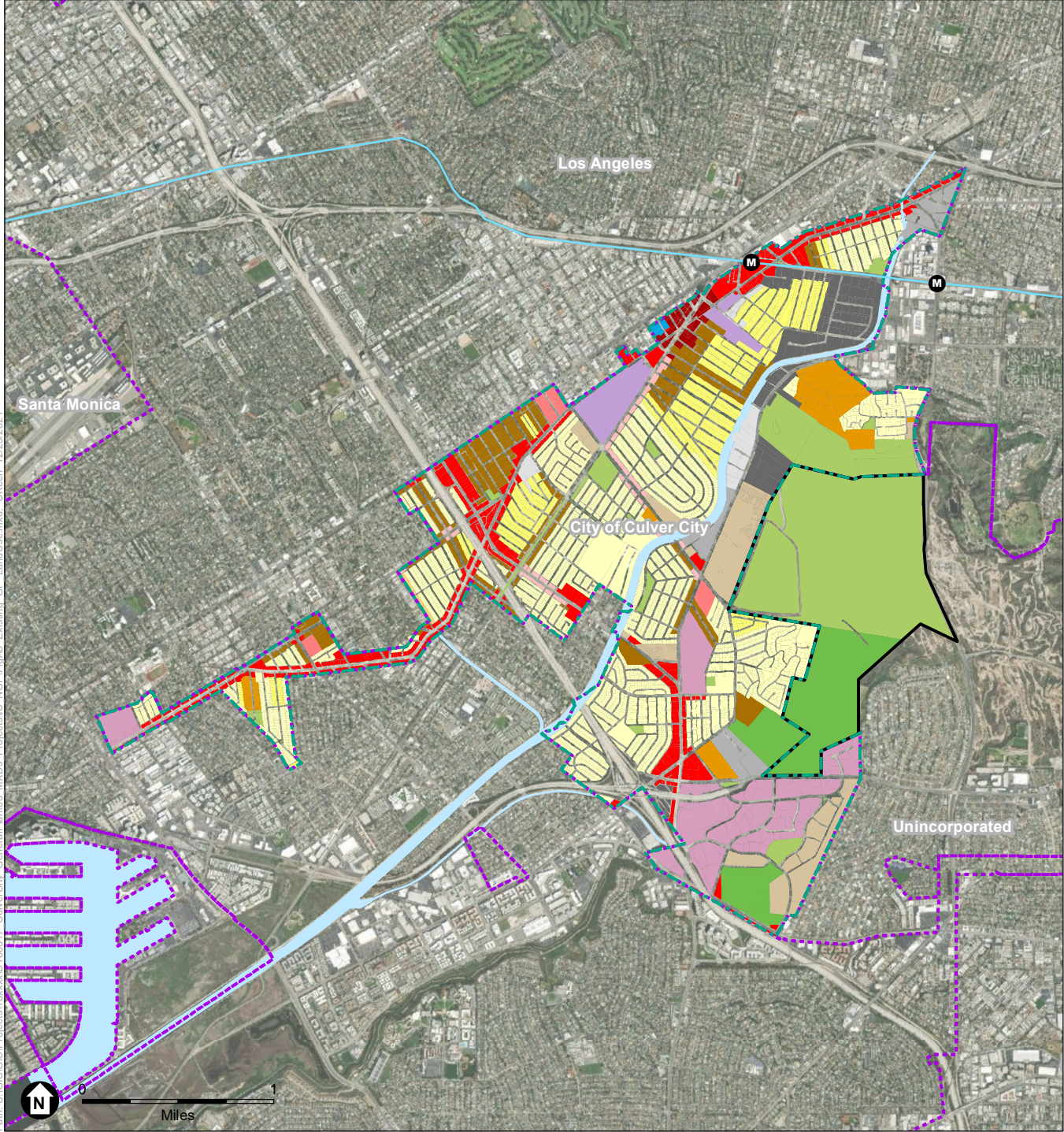
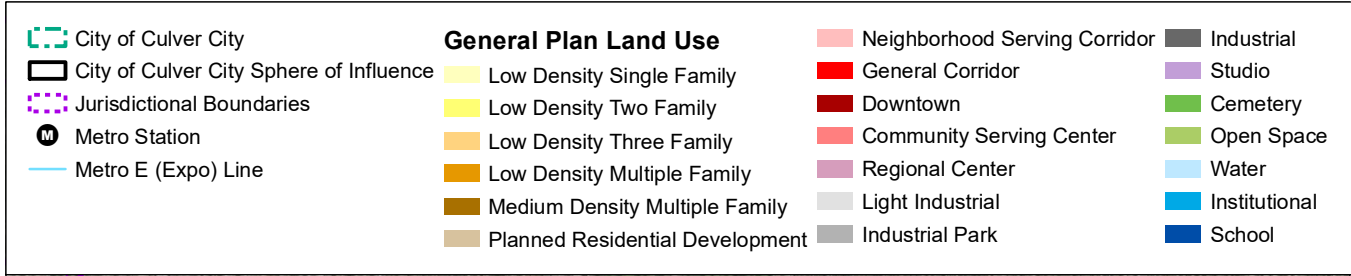


SOURCE: ESRI, 2021; City of Culver City, 2019.

Picture Culver City: General Plan 2045

**Figure A-2**  
GPU Planning Area





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

Picture Culver City: General Plan 2045

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



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

| <b>Land Use Designation</b>     | <b>Acres</b>   | <b>Percentage<sup>1</sup></b> |
|---------------------------------|----------------|-------------------------------|
| <b>Residential</b>              | <b>1,408.1</b> | <b>44.0</b>                   |
| 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                           |
| <b>Commercial</b>               | <b>501.1</b>   | <b>15.7</b>                   |
| 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                           |
| <b>Industrial</b>               | <b>226.6</b>   | <b>7.1</b>                    |
| Industrial                      | 135.6          | 4.2                           |
| Industrial Park                 | 57.7           | 1.8                           |
| Light Industrial                | 33.4           | 1.0                           |
| <b>Open Space</b>               | <b>633.0</b>   | <b>19.8</b>                   |
| <b>Cemetery</b>                 | <b>238.6</b>   | <b>7.5</b>                    |
| <b>Studio</b>                   | <b>113.2</b>   | <b>3.5</b>                    |
| <b>Ballona Creek</b>            | <b>72.8</b>    | <b>2.3</b>                    |
| <b>Institutional</b>            | <b>3.5</b>     | <b>0.1</b>                    |
| <b>Total<sup>2</sup></b>        | <b>3,196.9</b> | <b>100.0</b>                  |

NOTES:

<sup>1</sup> The area is calculated for land within the Planning Area.

<sup>2</sup> Totals may not add due to rounding.

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

## **E. DESCRIPTION OF PROPOSED PROJECT**

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

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



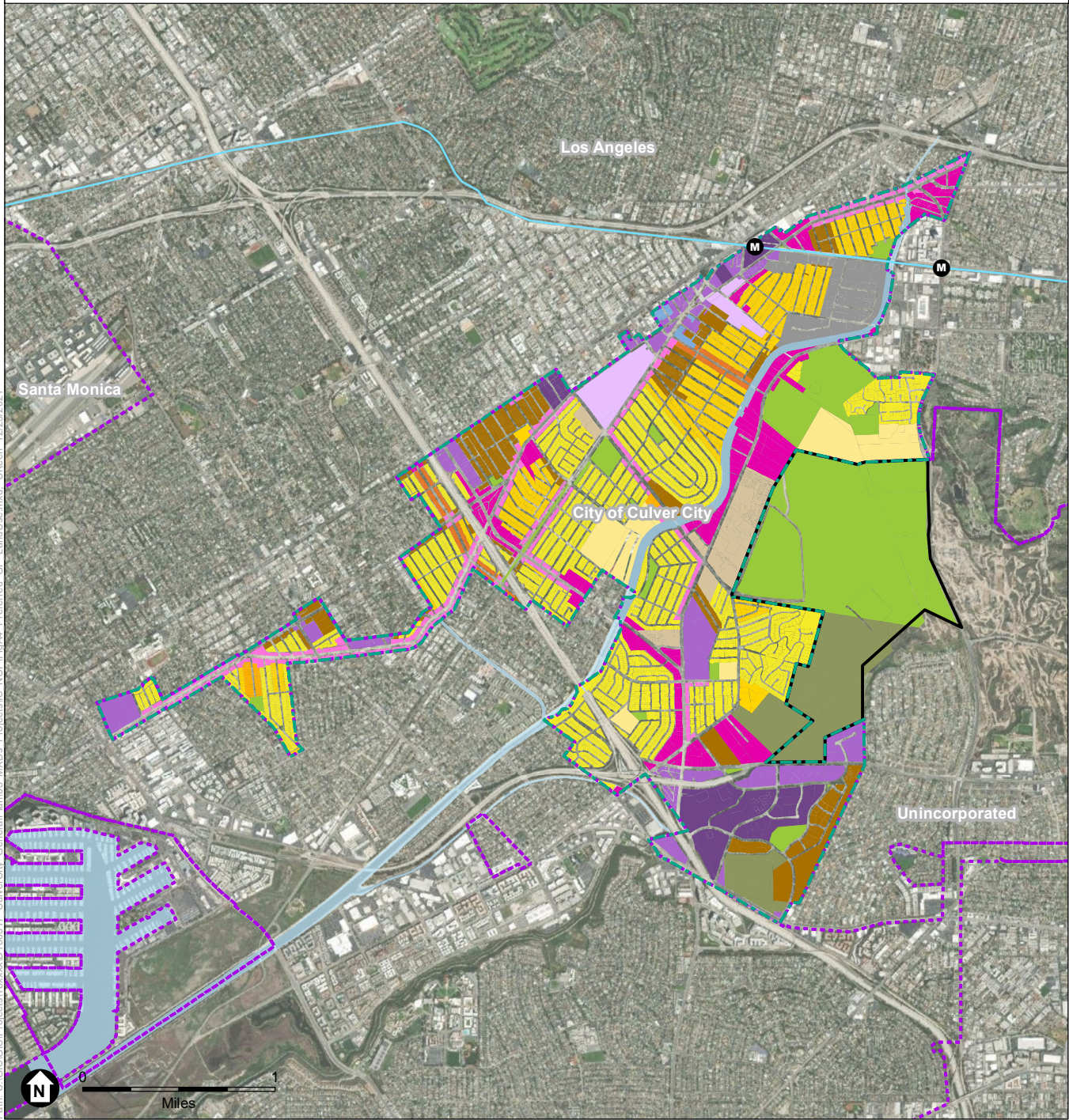
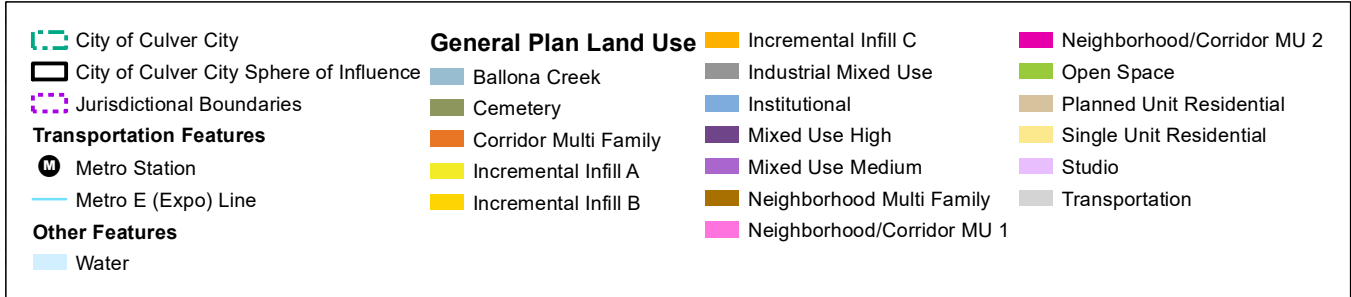
5. **Conservation and Open Space Element**\_ - Identifies goals, objectives, policies, and programs that address cultural resources, biological resources, wildlife and plant species, the urban forest, stormwater, groundwater, air quality, mineral resources, and Ballona Creek.
6. **Safety Element** -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

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

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

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

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



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

Picture Culver City: General Plan 2045

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





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

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

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

N/A = not applicable

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

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

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

N/A = not applicable.

<sup>a</sup> Note that the 1996 General Plan does not project households.

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

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

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

sf = square feet

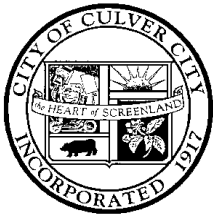
<sup>a</sup> Note that studio uses, which are a defined General Plan land use designation, are included as part of the overall commercial square footage.

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

## F. NECESSARY APPROVALS

The anticipated approvals required for the GPU are as follows:

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



## ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

### I. AESTHETICS

*Would the Project:*

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

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

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

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

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

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

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

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

**II. AGRICULTURE AND FORESTRY RESOURCES**

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

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

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

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

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

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

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

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

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

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

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

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

**III. AIR QUALITY**

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

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

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

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

**Potentially Significant Impact.** The Planning Area is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O<sub>3</sub>) standards and the current particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard for source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designate the Los Angeles County portion of the basin as attainment for lead. The GPU could result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality

standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As such, implementing the GPU could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Planning Area. Therefore, it is recommended that an EIR evaluate this topic evaluated further.

**c. Expose sensitive receptors to substantial pollutant concentrations?**

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

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

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

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

## **IV. BIOLOGICAL RESOURCES**

*Would the Project:*

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

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

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

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

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

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

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

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

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

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

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

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

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

## V. CULTURAL RESOURCES

*Would the Project:*

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

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

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

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

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

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



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

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

**VI. ENERGY**

*Would the Project:*

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

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

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

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

**VII. GEOLOGY AND SOILS**

*Would the Project:*

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

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

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

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

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

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

## ii. Strong seismic ground shaking?

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

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

## iii. Seismic-related ground failure, including liquefaction?

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

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

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

#### **iv. Landslides?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **VIII. GREENHOUSE GAS EMISSIONS**

*Would the Project:*

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

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

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

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

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

## **IX. HAZARDS AND HAZARDOUS MATERIALS**

*Would the Project:*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **X. HYDROLOGY AND WATER QUALITY**

*Would the Project:*

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

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

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

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

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

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

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

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

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

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

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

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

**iv. Impede or redirect flood flows?**

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

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

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

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

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

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<sup>5</sup> California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map, [https://maps.conservation.ca.gov/cgs/informationwarehouse/ts\\_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm\\_source=cgs+active&utm\\_content=losangeles](https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles). Accessed November 22, 2021.



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

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

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

## **XI. LAND USE AND PLANNING**

*Would the Project:*

**a. Physically divide an established community?**

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

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

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

## **XII. MINERAL RESOURCES**

*Would the Project:*

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

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

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

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<sup>6</sup> City Culver City, Natural Hazards – Fire and Flooding, February 1, 2007.

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

### **XIII. NOISE**

*Would the Project result in:*

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

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

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

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

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

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

### **XIV. POPULATION AND HOUSING**

*Would the Project:*

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

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

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

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

**XV. PUBLIC SERVICES**

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

**i. Fire protection?**

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

**ii. Police Protection?**

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

**iii. Schools?**

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

#### iv. Parks?

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

#### v. Other public facilities?

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

### XVI. RECREATION

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

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

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

### XVII. TRANSPORTATION

*Would the Project:*

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

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

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

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

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

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

**d. Result in inadequate emergency access?**

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

## **XVIII. TRIBAL CULTURAL RESOURCES**

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

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

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

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

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

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

## **XIX. UTILITIES AND SERVICE SYSTEMS**

*Would the Project:*

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

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

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

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

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

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

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

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

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

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

**XX. WILDFIRE**

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

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

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

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



**A-3 Scoping Comments  
from NOP and  
Recirculated NOP  
(To Be Provided)**



## Wrenn, Lauren

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**From:** Haasehaus <haasehaus@aol.com>  
**Sent:** Wednesday, March 16, 2022 9:36 AM  
**To:** ADVANCE PLANNING  
**Subject:** IS/NOP for Picture Culver City: General Plan 2045

Dear Planning Division Staff:

The Initial Study shows that the proposed General Plan likely would have a **significant** impact on the vast majority of the environmental segments evaluated. This calls into question the consistent statements made by the Planning Commission and the three council members that THEIR plan would not impact the environment.

I ask that the points made by both myself and fellow residents of Culver City be re-considered.

Specifically, the City needs keep R-1 zoning. The draconian proposal for an R-1 elimination is not necessary nor is it being pushed by the residents of Culver City. Allowing developers to build and sell four units in R-1 neighborhoods will entail ripping out trees, bushes and gardens. It will force many cars onto the streets for parking. Many neighborhoods already have very little available street parking - especially on street cleaning days and on days when film crews take over the area. Driving around looking for a space to park does have an impact on the environment.

Further, eliminating R1 will mean stressing infrastructure in ALL areas on of Culver City and lead to the need for costly upgrades in all areas.

I have yet to hear or read a logical explanation as to why the elimination of R-1 zoning is the best option. I do not have time nor the desire to speculate as to the motives of a certain few in power. This initial Study SHOULD give everyone pause. This General Plan needs an overhaul.

Please listen to the points made by the Culver City residents.

Thank you

Mary Haase  
Culver City



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201

[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*GAVIN NEWSOM, Governor*  
*CHARLTON H. BONHAM, Director*



March 18, 2022

Lauren Marsiglia  
City of Culver City  
9770 Culver Blvd  
Culver City, CA 90232  
[Advance.Planning@culvercity.org](mailto:Advance.Planning@culvercity.org)

**Subject: Notice of Preparation of a Draft Environmental Impact Report for Picture Culver City: General Plan 2045 Project, SCH #2022030144, City of Culver City, Los Angeles County**

Dear Ms. Marsiglia:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Culver City (City) for the Picture Culver City: General Plan 2045 (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

*Conserving California's Wildlife Since 1870*

Lauren Marsiglia  
City of Culver City  
March 18, 2022  
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## Project Description and Summary

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

As part of the Project, land use designations will be updated to allow for more residential density and grater mix of uses. These updates include allowing multiple units per lot; blending residential, commercial, retail uses, and public spaces; and blending retail stores, restaurants, hotels, services, residential, and office uses.

**Location:** The Project would apply to the entire geographic area located within the boundaries of the City of Culver City and additional unincorporated areas of Los Angeles County. The City of Culver City is located in the southern part of Los Angeles County. The City comprises about five square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

### Specific Comments

- 1) Sensitive Habitats and Open Space Sites. Sensitive habitats/open space in the Project area is present in the form of parks and reserves, including, but not limited to, Syd Kronenthal Park, Culver City Park, Blair Hills Park, Carlson Park, Veterans Park, Lindberg Park, Culver West Alexander Park, Fox Hills Park, Kenneth Hahn State Recreation Area, and the Inglewood Oil Field.
  - a) CDFW recommends the City analyze and discuss the Project's direct impacts on sensitive habitats/open space within the Project area. The Project could result in loss of sensitive habitats/open space due to fuel modifications and introduction of non-native, invasive plants facilitated by the Project (collectively, indirect impacts). The EIR should disclose the acreage of sensitive habitats and open space that would be lost as a result of any subsequent development from the proposed Project, including all areas subject to fuel modifications and grading to accommodate development. CDFW also recommends the City analyze and discuss the Project's potential impacts on conserved lands adjacent to the Project area.

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City of Culver City  
March 18, 2022  
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- b) CDFW recommends the Project avoid developing and encroaching onto sensitive habitats/open space. Encroachment onto sensitive habitats/open space creates an abrupt transition between two different land uses. Encroachment onto sensitive habitats/open space could affect environmental and biological conditions and increase the magnitude of edge effects on biological resources. CDFW recommends the EIR provide alternatives to the Project that would not result in conversion of sensitive habitats/open space into developed areas. CDFW also recommends the EIR provide alternatives that would not encroach onto sensitive habitats/open space, particularly conservation easements. Pursuant to CEQA Guidelines section 15126.6, an EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives.” Furthermore, an EIR “shall include sufficient information about alternatives to allow meaningful evaluation, analysis, and comparison with the proposed project” (CEQA Guidelines, § 15126.6) (see General Comment #6).
  - c) If avoidance is not feasible, CDFW recommends the EIR provide measures to mitigate for impacts to sensitive habitats/open space. There should be no net loss of sensitive habitats/open space. CDFW recommends the EIR provide measures where any future development facilitated by the Project mitigates (avoids first if feasible) for project-level impacts on sensitive habitats/open space not previously identified in the EIR. CDFW recommends the EIR provide a measure where any future development facilitated by the Project establishes unobstructed vegetated buffers and setbacks. The EIR should provide standards for an effective buffer and setback; however, the buffer and setback distance should be increased at a project-level as needed. The EIR should provide justifications for the effectiveness of all proposed mitigation measures. The EIR should provide sufficient information and disclosure to facilitate meaningful public review, analysis, and comment on the adequacy of proposed mitigation measures to offset Project-related impacts on sensitive habitats/open space.
- 2) Impacts on Wildlife Corridors and Habitat Connectivity. According to the *Natural Areas Small-California Essential Habitat Connectivity* dataset available in BIOS, the Project area supports some small continuous natural habitat blocks in the south-central area of the City that support native biodiversity and areas essential for ecological connectivity between them (CDFWa 2022). The Project could impact the ecological integrity and function of wildlife corridors and steppingstones supporting resident and transient wildlife movement. Habitat fragmentation could threaten the viability of remaining natural resources. Maintaining wildlife corridors and habitat connectivity is essential for wildlife survival and is increasingly important considering habitat loss and climate change.
- a) CDFW recommends the City analyze whether the Project would impact wildlife corridors (see General Comment #5e). Impacts include (but are not limited to) habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through Project area where development is proposed. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment if significant environmental



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City of Culver City  
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impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147).

- b) CDFW recommends the Project avoid developing and encroaching onto wildlife corridors. If avoidance is not feasible, CDFW recommends the EIR provide measures to mitigate for the Project's significant impacts on wildlife corridors (see General Comments #9 and #10). CDFW also recommends the EIR provide measures where any future development facilitated by the Project mitigates (avoids first if feasible) for project-level impacts on wildlife corridors not previously identified in the EIR
- 3) Coastal California Gnatcatcher. The Project area contains critical habitat for the coastal California gnatcatcher (*Polioptila californica californica*), a California Species of Special Concern (SSC) and a species listed as threatened under the Endangered Species Act (ESA) (USFWS 2022). CDFW recommends the EIR discuss the Project's potential impacts on coastal California gnatcatcher and habitat. The EIR should provide measures to avoid those impacts or measures to mitigate for impacts if avoidance is not feasible.
- 4) Crotch's Bumble Bee. CDFW recommends the EIR discuss the Project's potential impacts on Crotch's bumble bee (*Bombus crotchii*). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range, and steep population declines make the species vulnerable to extirpation from the State. Crotch's bumble bee is also listed as an invertebrate of conservation priority under the California [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the City or a project proponent (CEQA Guidelines, § 15065). Project activities may have potential to substantially reduce or adversely modify habitat, impair the viability of populations, and reduce the number and range of the Crotch's bumble bee.
- 5) Jurisdictional Waters. Ballona Creek runs through the City and may be impacted by future development within or adjacent to the creek. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.*
  - a) CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information

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about LSA Notification (CDFWb 2022).

- b) In the event the Project area may support aquatic, riparian, and wetland habitats; a preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
  - c) In Project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes. Therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated buffer areas adjoining ephemeral drainages. The environmental document should provide a justification for the effectiveness of the chosen distance for the setback.
  - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
  - e) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the environmental document evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 6) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Accordingly, CDFW recommends the DEIR provide measures where future infill development facilitated by the Project avoids potential impacts to bats.
- a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts.
  - b) CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

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- 7) Nesting Birds. CDFW recommends the DEIR include measures where future development facilitated by the Project avoids potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.
- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
  - b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31/September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
  - c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future infill development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 8) Loss of Bird and Raptor Nesting Habitat. The biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles area, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). The Initial Study states the General Plan Update “may require the removal of existing trees, including street trees or protected trees.” Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (*Accipitridae*, *Falconidae*) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper’s hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020). According to eBird, there are multiple observations of red-tailed hawks and Copper’s hawks throughout the City.
- a) CDFW recommends the DEIR provide measures where future development facilitated by the Project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density (Wood and Esaian 2020). CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, subshrubs, shrubs, and trees).

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- b) If impacts to trees cannot be avoided, trees should be replaced to compensate for the temporal or permanent loss habitat within a project site. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern. Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.
- c) CDFW recommends planting native tree species preferred by birds. This includes coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) (Wood and Esaian 2020). CDFW recommends Audubon Society's [Plants for Birds](#) for more information on selecting native plants and trees beneficial to birds (Audubon Society 2022).

### General Comments

- 1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.
  - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
  - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

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- 3) **Biological Baseline Assessment**. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A project-level environmental document should 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 [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFWc 2022);
  - 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 Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
  - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project 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 the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFWd 2022). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
  - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California

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Species of Special Concern, and California Fully Protected Species (Fish & G. 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 (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2022). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife Service; and,

- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.
  - g) A biological resources survey should include identification and delineation of any 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.
- 4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2022). The City should ensure data collected at a project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
  - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];

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- c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
  - d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
  - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and
  - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project;
  - b) CEQA Guidelines section 15126.6(a) states that an environmental document shall describe a reasonable range of potentially feasible 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. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,
  - c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed



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spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.
- 7) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 8) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 9) Compensatory Mitigation. An environmental document should include mitigation measures for adverse Project related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site



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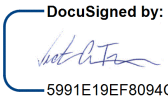
mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

- 10) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

## Conclusion

We appreciate the opportunity to comment on the NOP for the City of Culver City in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
5991E19EF8094C3...

Victoria Tang signing for

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW

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*Making Conservation  
a California Way of Life.*

April 4, 2022

Lauren Marsiglia  
City of Culver City Advance Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232

RE: Picture Culver City: General Plan  
2045– Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2022030144  
GTS # 07-LA-2022-03876

Dear Lauren Marsiglia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project, Picture Culver City: General Plan 2045 (GPU), is a comprehensive update to the City's General Plan. The City must update its General Plan periodically to respond to the changing needs and conditions of the city and region and to reflect new state laws. The General Plan 2045 will consist of 14 Elements. The following list of Elements are required by the State: Land Use and Community Design; Mobility; Housing; Noise; Conservation and Open Space; Safety; and Equity, Community Health, and Environmental Justice. In addition to the required Elements, the GPU will also include the following Elements: Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure. The City of Culver City is the Lead Agency under the California Environmental Quality Act (CEQA).

The City of Culver City is in the southern part of Los Angeles County. The City comprises about 5 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. The Planning Area for the GPU covers about 3,910 acres, of which about 3,280 acres (84 percent) is within the City limits and about 630 acres (16 percent) is in unincorporated Los Angeles County. The Planning Area includes land within the City's jurisdictional boundaries and its Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city. Since the project covers the entire City, it is located near Interstates 10 (I-10) and 405 (I-405) as well as State Routes 1 (SR-1), 90 (SR-90), and 187 (SR-187). After reviewing the NOP, Caltrans looks forward to reviewing this project's forthcoming Vehicle Miles Traveled (VMT) analysis. As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future projects under CEQA, starting July 1, 2020.

For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the

California Governor's Office of Planning and Research (OPR), dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf). The City can also refer to Caltrans' updated Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

Note that the updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interimldigr-safety-review-guidance-a11y.pdf>. Caltrans encourages lead agencies to complete traffic safety impact analysis in the CEQA review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Caltrans also encourages lead agencies to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For additional strategies to integrate into the General Plan Update that will promote equity and environmental preservation, please refer to:

- The 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>
- Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at [Ronnie.Escobar@dot.ca.gov](mailto:Ronnie.Escobar@dot.ca.gov), and refer to GTS # 07-LA-2022-03876.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse



March 24, 2022

Ref. DOC 6477369

Ms. Lauren Marsiglia, Interim Advance Planning Manager  
City of Culver City  
Advance Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232

Dear Ms. Marsiglia:

**NOP Response to Picture Culver City: General Plan 2045**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of an Environmental Impact Report for the subject project on March 7, 2022. A portion of City of Culver City (City) is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. A portion of the wastewater generated by the City will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 249.8 mgd. The remaining wastewater generated by the City will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the City should also be directed to the City of Los Angeles' Department of Public Works.
3. The Districts should review individual developments within the City to determine whether sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
4. In order to estimate the volume of wastewater the project will generate, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. condominium, single family home, etc.) that best represents the actual or anticipated use of the parcel(s)

or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or [mandyhuffman@lacsdsd.org](mailto:mandyhuffman@lacsdsd.org).

Very truly yours,

*Mandy Huffman*

Mandy Huffman  
Environmental Planner  
Facilities Planning Department

MNH:mnh



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

April 4, 2022

Lauren Marsiglia  
City of Culver City Advance Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232  
Sent by Email: [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org)

RE: Picture Culver City: General Plan 2045  
Notice of Preparation of Environmental Impact Report (EIR)

Dear Ms. Marsiglia:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed General Plan 2045 (Plan) located in the City of Culver City (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.<sup>1</sup>

Metro and the City have collaborated closely on several projects, including the Ivy Station Joint Development, Platform Greenspace, and active transportation improvements. We are committed to continuing a collaborative approach with respect to this Plan and future development projects adjacent to the E Line (Expo) in the City.

### **Project Description**

The Project includes an update to the General Plan to respond to the changing needs and conditions of the city and region to reflect new state laws. The General Plan will consist of 14 Elements. In addition to Elements required by the state, the General Plan Update (GPU) will also include



Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.

## **Recommendations for EIR Scope and Content**

### *Transit Services and Facilities*

The Plan and EIR should include updated information on existing and planned transit services and facilities within the Plan area. In particular, Metro’s NextGen Bus Plan (completed in December 2021) should be used as a resource to determine the location of high-frequency bus services and stops within the Plan area. For more information, visit the NextGen Bus Plan’s website at <https://www.metro.net/projects/nextgen/>. Please also refer to Metro’s 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

### *Adjacency to Metro-owned Right-of-Way (ROW) and Facilities*

The Plan area includes Metro-owned ROW and transit facilities for Metro Rail and Metro Bus. This includes the E Line (Expo). Buses and trains operate 24 hours a day, seven days a week in these facilities.

The EIR’s transportation section should analyze potential impacts on Metro facilities within the Plan area, and identify mitigation measures or project design features as appropriate. Metro recommends reviewing the Metro Adjacent Development Handbook (available at <https://www.metro.net/devreview>) to identify issues and best practices for development standards arising from adjacency to Metro infrastructure. In addition, Metro recommends that the Plan include a policy encouraging applicants to coordinate with Metro during the City’s Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure. Such projects should also comply with the Adjacent Development Handbook.

## **Transit Supportive Planning: Recommendations and Resources**

Considering the Plan area’s inclusion of Culver City Station and key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the City review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources/>.
2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of the Culver City Station within the Plan area and include strategies to orient pedestrian pathways towards the Station.
3. Transit Connections and Access: Given the Plan area’s proximity to Culver City Station, the Plan should include policies and/or design standards to accommodate transfer activity between bus and rail customers that will occur along the sidewalks and public spaces. Metro

completed the Metro Transfers Design Guide, a best practice document on transit improvements. This can be accessed online at <https://www.metro.net/about/station-design-projects/>

4. Walkability: Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the Culver City Station. The City should consider requiring the installation of such amenities as part of the conditions of approval of projects within the Plan area.
5. Access: The Plan should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: [http://media.metro.net/docs/sustainability\\_path\\_design\\_guidelines.pdf](http://media.metro.net/docs/sustainability_path_design_guidelines.pdf)
6. Active Transportation: Metro encourages the City to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or a secured bike room, for guests, employees, and residents. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. Additionally, the Plan should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the destinations within the Plan area.
7. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design.
8. Art: Metro Arts & Design encourages the thoughtful integration of art and culture into public spaces and should be consulted for any proposals for public art and/or placemaking facing Metro ROW.
9. Multi-modal Connections: With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Plan area and nearby transit services, including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
10. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Picture Culver City: General Plan 2045  
Notice of Preparation of EIR – Metro Comments  
April 4, 2022

Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit oriented communities. If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at [DevReview@metro.net](mailto:DevReview@metro.net), or by mail at the following address:

Metro Development Review  
One Gateway Plaza  
MS 99-22-1  
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP  
Manager, Development Review Team  
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>



## NATIVE AMERICAN HERITAGE COMMISSION

March 7, 2022

Lauren Marsiglia  
City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232

**Re: 2022030144, Picture Culver City: General Plan 2045 Project, Los Angeles County**

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

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Nomlaki

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**Wayne Nelson**  
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**NAHC HEADQUARTERS**  
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California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

Dear Ms. Marisglia:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that 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. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources 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, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process 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. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)



## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse





SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
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March 29, 2022

Ms. Lauren Marsiglia, Interim Advance Planning Manager  
City of Culver City, Advance Planning Division  
9770 Culver Boulevard  
Culver City, California 90232  
Phone: (310) 253-5740  
E-mail: [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org)

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for Picture Culver City: General Plan 2045 [SCAG NO. IGR10582]**

Dear Ms. Marsiglia,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for Picture Culver City: General Plan 2045 (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.<sup>1</sup>

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for Picture Culver City: General Plan 2045 in Los Angeles County. The proposed project consists of updating the City’s General Plan to respond to the changing needs and conditions of the city and region, as well as new state laws, within 14 elements.

**When available, please email environmental documentation to [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov) providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

Sincerely,

Frank Wen, Ph.D.  
Manager, Planning Strategy Department

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
PICTURE CULVER CITY: GENERAL PLAN 2045 [SCAG NO. IGR10582]**

**CONSISTENCY WITH CONNECT SOCIAL**

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with Connect SoCal.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

| SCAG CONNECT SOCIAL GOALS |  |
|---------------------------|--|
| Goal #1:                  | <i>Encourage regional economic prosperity and global competitiveness</i>   |
| Goal #2:                  | <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>                           |
| Goal #3:                  | <i>Enhance the preservation, security, and resilience of the regional transportation system</i>                      |
| Goal #4:                  | <i>Increase person and goods movement and travel choices within the transportation system</i>                        |
| Goal #5:                  | <i>Reduce greenhouse gas emissions and improve air quality</i>   |
| Goal #6:                  | <i>Support healthy and equitable communities</i>   |
| Goal #7:                  | <i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i> |
| Goal #8:                  | <i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>       |
| Goal #9:                  | <i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i> |
| Goal #10:                 | <i>Promote conservation of natural and agricultural lands and restoration of habitats</i>                            |

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

| SCAG CONNECT SOCIAL GOALS   |   |
|---|---|
| Goal  | Analysis  |
| Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>                   | <i>Consistent: Statement as to why;<br/>Not-Consistent: Statement as to why;<br/>Or<br/>Not Applicable: Statement as to why;<br/>DEIR page number reference</i> |
| Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i> | <i>Consistent: Statement as to why;<br/>Not-Consistent: Statement as to why;<br/>Or<br/>Not Applicable: Statement as to why;<br/>DEIR page number reference</i> |
| etc.  | etc.  |

**Connect SoCal Strategies**

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

SCAG staff would like to call your attention to resources available from SCAG’s [Regional Climate Adaptation Framework](#) including the [Southern California Climate Adaptation Planning Guide](#), [Communication and Outreach Toolkit](#), [Library of Model Policies](#), and [SB 379 Compliance Curriculum for Local Jurisdictions](#).

**DEMOGRAPHICS AND GROWTH FORECASTS**

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance

with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

|            | Adopted SCAG Region Wide Forecasts |            |            |            | Adopted City of Culver City Forecasts |           |           |           |
|------------|------------------------------------|------------|------------|------------|---------------------------------------|-----------|-----------|-----------|
|            | Year 2020                          | Year 2030  | Year 2035  | Year 2045  | Year 2020                             | Year 2030 | Year 2035 | Year 2045 |
| Population | 19,517,731                         | 20,821,171 | 21,443,006 | 22,503,899 | 40,257                                | 40,743    | 41,011    | 41,573    |
| Households | 6,333,458                          | 6,902,821  | 7,170,110  | 7,633,451  | 17,146                                | 17,505    | 17,675    | 18,014    |
| Employment | 8,695,427                          | 9,303,627  | 9,566,384  | 10,048,822 | 60,312                                | 61,635    | 62,303    | 64,071    |

**MITIGATION MEASURES**

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

**ENVIRONMENTAL JUSTICE**

Per [Senate Bill 1000](#) (SB 1000), local jurisdictions in California with disadvantaged communities are required to develop an Environmental Justice (EJ) Element or consider EJ goals, policies, and objectives in their General Plans when updating two or more General Plan Elements. Culver City does not have any disadvantaged communities but if the City would like to consider environmental justice in its General Plan Update, SCAG staff recommends that you review the [Environmental Justice Technical Report](#) and the updated [Environmental Justice Toolbox](#), which is a resource document to assist local jurisdictions in developing EJ-related goals and policies regarding solutions for EJ-related community issues.

SENT VIA E-MAIL:

March 22, 2022

[advance.planning@culvercity.org](mailto:advance.planning@culvercity.org)

Lauren Marsiglia, Interim Manager  
City of Culver City, Advance Planning Division  
9770 Culver Boulevard  
Culver City, California 90232

**Notice of Preparation of an Environmental Impact Report for the Proposed  
Picture Culver City General Plan 2045 (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.



mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>6</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan<sup>7</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>8</sup>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS  
LAC220308-06  
Control Number

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>7</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>8</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: [https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).



**GABRIELENO BAND OF MISSION INDIANS - KIZH NATION**  
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

March 9, 2022

Project Name: Culver City: General Plan 2045, City of Culver City, Los Angeles County, California

Dear Lauren Marsiglia,

Thank you for your letter dated March 2, 2022 regarding the project above. This is to concur that we are in agreement with the General Plan Update. However, our Tribal government would like to request consultation if there will be ground disturbance occurring for any and all future projects within this location.

Sincerely,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians.org](http://www.gabrielenoindians.org)

admin@gabrielenoindians.org



(310) 253-5725

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PLANNING AND DEVELOPMENT DEPT.

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

## RECIRCULATED NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND EIR SCOPING MEETING

### PICTURE CULVER CITY: GENERAL PLAN 2045 AND ZONING CODE UPDATE

**NOTICE IS HEREBY GIVEN** to all responsible agencies and interested parties that the City of Culver City (City), as the Lead Agency, will be preparing an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082. This Recirculated Notice of Preparation (NOP) has been prepared to describe the Picture Culver City: General Plan 2045 and Zoning Code Update (project) and identify the scope of environmental issues recommended to be addressed in the EIR, and to seek your comments on what environmental effects and alternatives the EIR should study. You are being notified of the City's intent, as Lead Agency, to prepare an EIR for the project, as it is located in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by consultants under direction of the City and submitted to the Advance Planning Division for independent review and certification.

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**PROJECT TITLE:** Picture Culver City: General Plan 2045 and Zoning Code Update

**APPLICANT/OWNER:** City of Culver City, Advance Planning Division

**PROJECT ADDRESS:** City of Culver City and Sphere of Influence (SOI) (see Figure 1)

**DUE DATE FOR PUBLIC COMMENTS ON THE NOP:** 5:30 PM on Monday, March 18, 2024

**EIR SCOPING MEETING:** 6 PM on Thursday, March 7, 2024

**PROJECT LOCATION:** The City of Culver City is located in the southern part of Los Angeles County. The city comprises about 5 square miles (13 square kilometers) and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary. The Planning Area for the project includes land within the City's jurisdictional boundaries and its SOI (see Figure 1). The Planning Area covers about 3,910 acres, of which about 3,280 acres (84 percent) is within city limits and about 630 acres (16 percent) is in unincorporated Los Angeles County adjacent to the city.

**PROJECT DESCRIPTION:** An NOP was previously circulated for the preparation of the EIR for the General Plan Update. However, in order to maintain compliance with the recently adopted 2021-2029 Housing Element and to comply with state law, Culver City is expanding the scope of this project to include a Zoning Code Update, which implements the Housing Element and proposed General Plan Update.

The City of Culver City is comprehensively updating its general plan to respond to the changing needs and conditions of the city and region and to reflect new state laws. The General Plan 2045 consists of the following 13 elements; Land Use and Community Design; Mobility; Housing; Noise; Conservation; Safety; Community Health and Environmental Justice; Governance and Leadership; Arts, Culture, and Creative Economy; Economic Development; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction; and Infrastructure.

Culver City is also updating its zoning code to implement the land use patterns and development framework defined in the General Plan and Housing Element Updates. Changes include revisions to existing zoning districts, new zoning districts and development standards, updated uses to be permitted in each district, and an updated zoning map consistent with the General Plan land use designations. The Zoning Code Update will also update the processes and procedures to be consistent with the General Plan and Housing Element Updates and recent changes to state law.

**ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIR:** The Culver City Advance Planning Division has determined that an EIR will be required to analyze the project's environmental effects. Environmental

issues identified as having the potential to result in significant impacts that require further evaluation in the EIR include: Aesthetics, Air Quality (all but odors), Biological Resources, Cultural Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems.

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**PUBLIC COMMENT PERIOD FOR NOP:** The Advance Planning Division welcomes and will consider all comments regarding the potential environmental impacts of the project and issues and alternatives to be addressed in the EIR. All comments will be considered in preparation of the EIR. The comment period for the NOP begins on **Thursday, February 15, 2024 and ends on Monday, March 18, 2024**. Written comments should be received on or before **Monday, March 18, 2024 at 5:30 PM**. Written comments should refer to the Picture Culver City: General Plan 2045 and Zoning Code Update and be addressed to:

Troy Evangelho, Advance Planning Manager  
City of Culver City Advance Planning Division  
9770 Culver Boulevard, Culver City, CA 90232  
Phone: (310) 253-5740 E-mail: [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org)

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**EIR SCOPING MEETING:** A virtual EIR Scoping Meeting will be held on **Thursday, March 7, 2024**. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meeting will be held in an online format using Zoom to share information regarding the project and the environmental review process. You may join, view, and participate in the meeting by using the Zoom application, by your web browser, or by phone. Register for the virtual meeting by visiting: <https://bit.ly/CulverCityGPEIR>. This will provide you with a confirmation, join link, and call-in numbers. You can join the meeting by phone at (888) 788-0099 with the webinar ID: 827 4151 4127. City staff and environmental consultants will be available during this meeting. The meeting will begin with a presentation and be followed by a public comment session. The meeting will be open to the public and all stakeholders. Comments may be submitted via e-mail before the meeting at [advance.planning@culvercity.org](mailto:advance.planning@culvercity.org).

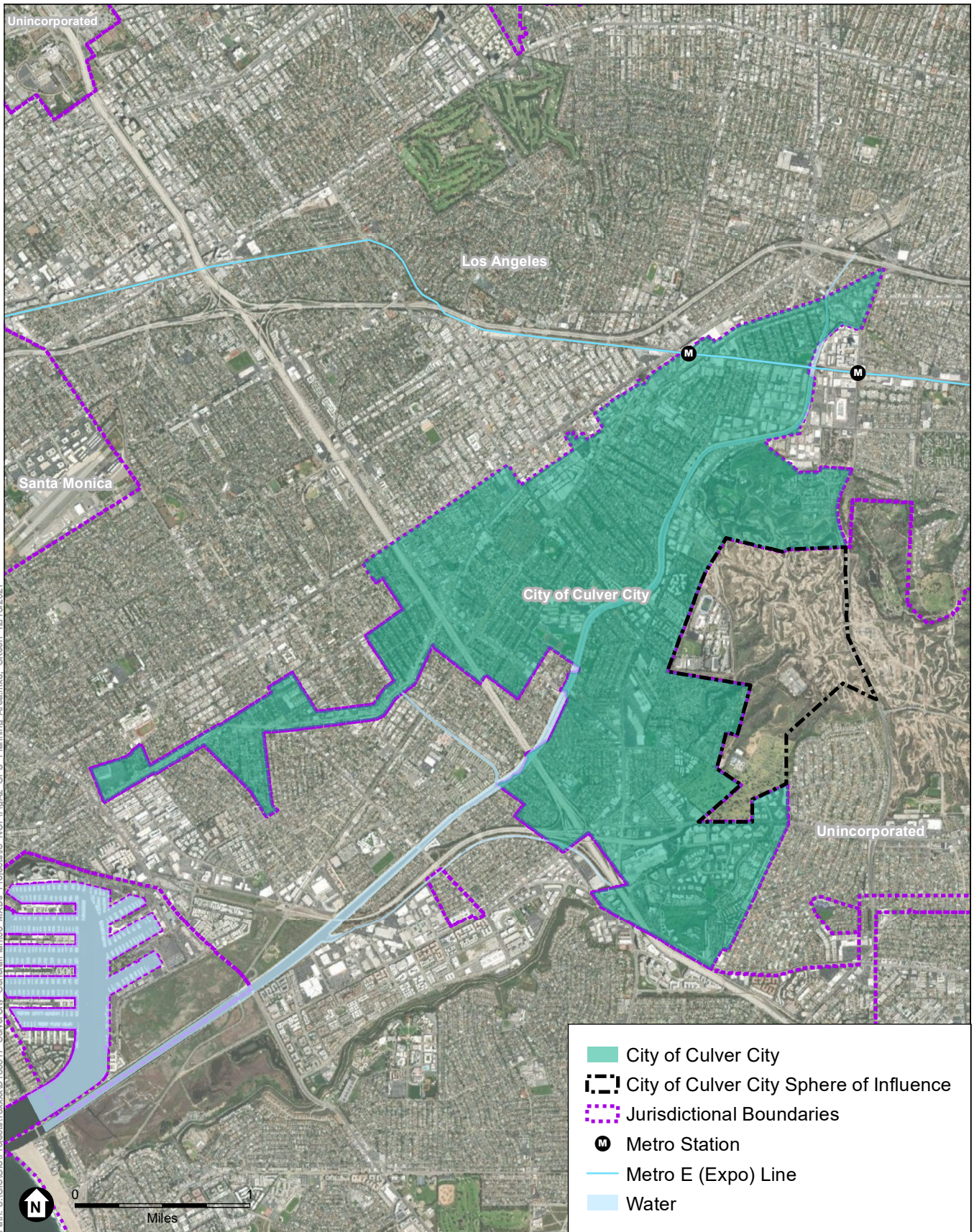
***The EIR Scoping Meeting will begin at 6 PM***

The Draft General Plan and Draft Zoning Framework are available online at [www.pictureculvercity.com](http://www.pictureculvercity.com), or physical copies are available for viewing at the Planning and Development Department, City Hall, Second Floor, 9770 Culver Boulevard, Culver City, CA 90232-0507 (handicapped accessible location). City Hall business hours are 7:30 AM – 5:30 PM, Monday through Friday, except alternate Fridays. Please call beforehand to assure staff availability at (310) 253-5740.

*Troy Evangelho*  
\_\_\_\_\_  
Troy Evangelho, Advance Planning Manager

2/12/24  
\_\_\_\_\_  
Date





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

Culver City General Plan Update

**Figure 1**  
GPU Planning Area