PLANNING AND DEVELOPMENT
CURRENT PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

(310) 253-5710
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www.culvercity.org

May 27, 2025

Spencer B. Kallick
Allen Matkins
1901 Avenue of the Stars #1800
Los Angeles, California 90067

RE: MINOR MODIFICATION TO PLANNED DEVELOPMENT ZONE 16 COMPREHENSIVE PLAN AND MINOR MODIFICATION TO ASSOCIATED CONDITIONS OF APPROVAL
11111 Jefferson Boulevard
P2025-0092, P2021-0025-CP/ZCMA/DOBI/TPM

Dear Spencer Kallick:

This letter is to inform you that your request for minor modifications to the Comprehensive Plan and Conditions of Approval for the mixed-use development project at 11111 Jefferson Boulevard is hereby approved. The requested modifications include a reduction in commercial floor area and an increase of 114 residential units as further detailed in Attachment No. 1.

Based upon the above findings and the authority set forth in Zoning Code Section 17.560.025.B, 17.595.035.A, and 17.595.035.B, the proposed project changes are determined to be minor and hereby approved administratively.

This administrative decision may be appealed in accordance with Title 17, Section 17.640.030 Appeals, by any interested person within 15 calendar days of approval, by 5:30 PM. If no appeal is filed, the decision shall become final. If a timely appeal is notified, City staff will notify the applicant.

If you have any questions, please contact William Kavadas, Assistant Planner at (310) 253-5706 or william.kavadas@culvercity.org.

Sincerely,

Mark E. Muenzer

Mark E. Muenzer
Planning and Development Director

Attachments:
1. Background and Analysis
2. Updated Planned Development Zone and Comprehensive Plan (amended pages only)
3. Conditions of Approval to Comprehensive Plan Minor Modifications
4. Environmental Impact Report Addendum

Copy: City Council
City Manger
Case file

Attachment 1: Background and Analysis
Minor Modification P2025-0092
11111 Jefferson Boulevard
ORDINANCE NO. 2021-015
P2021-0025-CP/ZCMA/DOBI/TPM

Background

On October 11, 2021, the Culver City Council approved Ordinance No. 2021-015 adopting Planned Development Zone 16 and a Comprehensive Plan for the mixed-use development located at 11111 Jefferson Boulevard.

Due to changes in the commercial real-estate landscape resulting from current economic realities, the applicant has requested to change the scope of the project to reduce commercial and office square footage and to create more housing units to address the State housing crisis.

Modification Request

Gen-Land, LLC c/o LPC West, Inc. has requested the following revisions to the approved Comprehensive Plan to comply with the conditions of approval of P2021-0025-CP/ZCMA/DOBI/TPM. These are listed below and highlighted in the attached Updated Planned Development Zone and Comprehensive Plan:

- Increasing the number of residential units from 230 to 344, including raising the number of affordable units from 19 to 52;
- Decreasing commercial square footage from 66,500 square feet to 2,000 square feet (this includes the elimination of office space);
- Eliminating the subterranean parking in favor of a stacked, wrapped garage (the total number of parking spaces has been reduced due to changes in uses, but the revised plan maintains the original parking ratios); and
- Increasing publicly accessible open space from 13,800 square feet to 17,520 square feet.

This request also requires minor modification to the conditions of approval to update or eliminate certain conditions of approval that no longer apply to the revised project. A summary of the modified conditions is below and the full text of the updated conditions can be found in Attachment 3.

1. Condition of Approval (COA) 8: Eliminate condition and incorporate Transportation Demand Management (TDM) Measures into COA 26.
2. COA 19: Modify to maintain traffic control but remove references to truck loading that has been removed under current project scope.
3. COA 21: Eliminate due to removal of subterranean parking.
4. COA 26: Update TDM to reflect current project scope.
5. COA 101: Eliminate due to removal of subterranean parking.
6. COA 116: Modify due to changes to the City's Community Benefit Density Bonus program. Proposed publicly accessible open space will be maintained by the applicant.
7. COA 136: Eliminate due to removal of loading dock for large vehicles.

Analysis

Findings for Approval of Comprehensive Plan Minor Amendment

The proposed changes do not constitute major changes, as supported by the findings below pursuant to Section 17.560.025 of the City Municipal Code:

1. *The proposed changes are consistent with the intent of the approved Comprehensive Plan.*
   The Comprehensive Plan was established with the intent to develop a high-quality mixed-use project that supports active transportation, improves the visual appeal of the neighborhood, and provides useable open space for a publicly accessible park. The proposed changes will reduce the amount of commercial floor area to reflect the current realities of the commercial real estate market, while increasing the number of market rate and affordable units to address the State's housing crisis. This modification will continue to provide a high-quality mixed-use development by reducing potential for vacant commercial spaces and increasing the number of units available for market-rate and affordable rent. The design of the building is similar to the modern style of the original and the Project provides streetscape improvements that benefit the pedestrian atmosphere of the surrounding neighborhood. Further, the applicant has increased the overall publicly accessible open space square footage, thus staying consistent with the original goals of the Comprehensive Plan.

2. *The proposed changes will not adversely impact the environment.*
   The proposed modification was reviewed by environmental consultant ESA to determine what, if any, environmental impacts may arise from the changes to the project. An Addendum to the original Environmental Impact Report (EIR) (Attachment 4) showed that impacts from the proposed modifications will either be the same or less impactful than the original project. All existing mitigation measures will be adhered to for the modified project, with the exception of one traffic mitigation measure that was required due to office space development, which is no longer part of the scope of work.

3. *The proposed changes will not be detrimental to the surrounding uses.*
   The proposed changes will not be detrimental to the surrounding uses. The project will be developed to meet all original conditions of approval (except as revised by this decision), and the proposed changes will enhance street activation and walkability in the neighborhood. Further, new residents will help to support surrounding commercial businesses along Sepulveda and Jefferson Boulevards.

4. *The proposed changes will not significantly increase traffic levels on existing streets and thoroughfares within and surrounding the development.*
   An updated traffic study, included as part of Attachment 4, showed the new project would have a net decrease in vehicle trips to the site compared to the original project. Therefore, the traffic levels will not significantly increase on existing streets and thoroughfares within and surrounding the development.

5. *Any proposed change, which requires exception from standard ordinance requirements, is warranted by the design and amenities incorporated into the approved Comprehensive Plan*.
   The proposed modifications to the project do not go beyond the allowances of the Comprehensive Plan and/or follow State law as appropriate. The proposed changes do not require exceptions from standard ordinance requirements and the design and

amenities incorporated are more suited to the current economic environment and provide the essential features of the original project.

Zoning Code Minor Criteria and Conditions of Approval

The changes to the conditions of approval of Ordinance No. 2021-015 conditionally approving the Comprehensive Plan meet the criteria detailed in CCMC Section 17.595.035B, allowing the Director to administratively approve minor changes to a project. The proposed changes to the conditions of approval are consistent with the findings above.

Environmental Determination

Per the California Environmental Quality Act (CEQA), an Addendum to the original EIR was conducted by ESA (Attachment 4). The Addendum analyzed proposed modifications to the approved Project and demonstrated that they do not meet the standards for a Supplemental or Subsequent EIR. As part of this effort, a trip generation analysis was also conducted to quantify transportation impacts. The proposed project is within the scope of the adopted EIR and the circumstances under which the EIR was prepared had not significantly changed. Additionally, reductions in impacts of the proposed Project led ESA to remove Mitigation Measure TRAF-1 as the measure was meant to reduce traffic impacts of office development, which is no longer part of the scope. Therefore, no additional environmental analysis is required. All mitigation measures, apart from TRAF-1 mentioned above, still apply.

Attachment 2

MINOR MODIFICATION NO.1 TO 11111 JEFFERSON COMPREHENSIVE PLAN

NOTES:

- Minor Modification No. 1 shall supersede the development standards, regulations, parking and loading requirements, road improvements, circulation, trash and recycling requirements, landscaping, site plan, and floor plans for the initially approved Comprehensive Plan.
- Minor Modification No. 1 does not contemplate changes to the Comprehensive Plan's permitted uses (sec. 2.1.4, Table 2), outdoor dining standards (sec. 2.3), alcoholic beverage sales (sec. 2.4), conceptual signage (sec. 2.6), public art (sec. 2.7), or sustainability (sec. 3).
- To the extent there is a conflict between Minor Modification No. 1 and the initially approved Comprehensive Plan, the Minor Modification No. 1 shall govern.

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MINOR MODIFICATION NO.1 TO 11111 JEFFERSON COMPREHENSIVE PLAN

Land Use	Comprehensive Plan	Minor Modification No.1	Difference
Residential			
Studio	54 du	51 du	-3 du
1 Bedroom	113 du	175 du	+62 du
2 Bedroom	63 du	118 du	+55 du
Subtotal Residential Units	*230 du*	*344 du*	*+114 du*
Affordable Units	19 du	52 du	+33 du
Commercial Component			
Commercial/Retail/Office/restaurant/Gym	66,500 sf	2,000 sf	-64,500 sf
Open Space			
Open Space[a]	27,821 sf	35,865 sf	+ 8,054 sf
Private Open Space (Balconies)	13,560 sf	15,600 sf	+2,040sf
Total Open Space Provided	41,381 sf	51,475 sf	+ 10,094 sf
Lobby/Amenity			
Lobby (including mailroom)	2,500 sf	4,975 sf	+2,475 sf
Amenity Space	2,500 sf	1,135 sf	+1,365 sf
Co-Working Space (Amenity)	0 sf	1,617 sf	+1,617 sf
Gym (Residential Amenity)	0 sf	2,515 sf	+2,515 sf
Total Amenity Square Footage (Excluding Lobby)	*2,500 sf*	*5,267`sf*	*+2,767 sf*
Parking			
Parking Area	311,109 sf	181,387 sf	-129,722 sf
Subterranean Levels	1 level	0 levels	-1 level
Vehicle Parking Spaces	653 spaces	502 spaces	-151 spaces
ECF Parking[b]	34 spaces	34 spaces	Same
Bicycle Parking Spaces	97 spaces	97 spaces	Same
Floor Area			
Total Project Square Footage	555,221 sf	566,812 sf	+11,591 sf
FAR (with parking)	3.71 FAR	3.79 FAR	+.08 FAR
Height			
Building levels/Maximum Height	67-ft tall (5-stories)	67-ft tall (6-stories)	Same

du = dwelling unit; sf = square feet

a. Reflects open space as calculated in Resolution No. 2021-R098

b. The ECF parking spaces are a relocation of the 34 ECF parking stalls previously located on-site and demolished as part of the Approved Project.

SOURCE: ESA, 2025.

TRANSPORTATION DEMAND MANAGEMENT PROGRAM

- **Transportation Information Center (TIC)**
  The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, giving every resident, employee, and visitor access to commuter information through a website portal.

- **Bicycle Parking and Amenities**
  The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include 10 short-term bike parking spaces (e.g., bicycle racks) and 87 secure long-term bicycle parking spaces (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner).

- **Bike Repair Station**
  The Project will provide an on-site bike parking station for use by Project residents that has a space and basic tools for bike repairs.

- **Pedestrian-Friendly Environment**
  The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts.

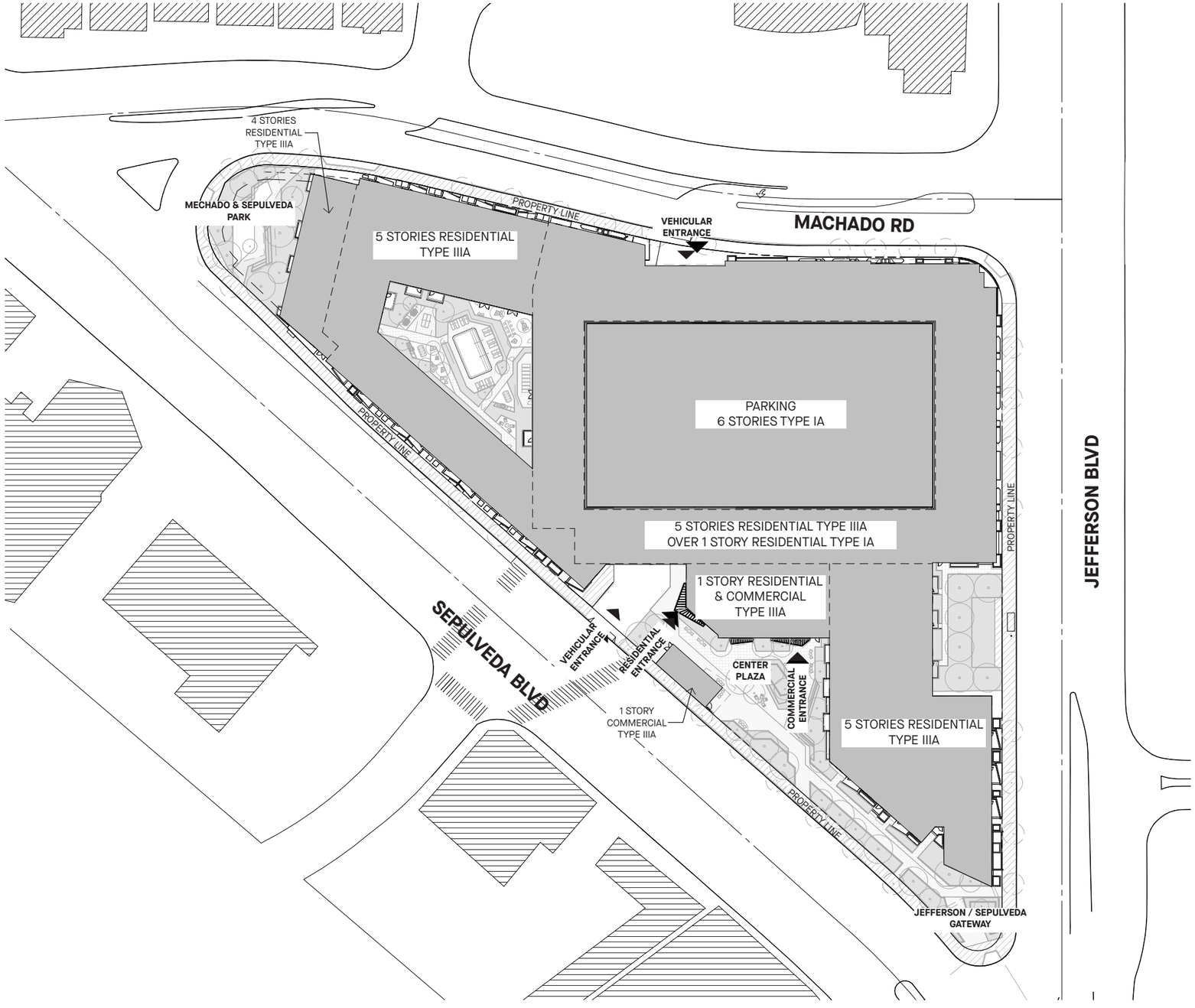
- **E-Assist Bicycles for Residents**
  The Project would provide several electric-assisted bicycles for rent for Project residents.

- **Subsidized Transit Passes**
  The Project would provide subsidy of 50% of the cost of an EZ Transit Pass for all requesting residents for a period of up to one year.

- **Project Transportation Coordinator**
  A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current.

- **Transportation Information Packet for New Residents**
  Each new resident will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator.

SITE PLAN



SCALE: 1” = 80’-0”

May 23, 2025

LANDSCAPE PLAN

Existing Tree

Proposed Tree

Building Entry

LEGEND:

1. Jefferson & Sepulveda
2. Garden Walk
3. Central Plaza
4. Courtyard
5. Sepulveda & Machado
6. Parking
7. Transformers
8. Drop-off
9. Residential and Ground Level Retail

SCALE: 1” = 80’-0”

May 23, 2025

GROUND FLOOR PLAN

LEGEND

- BUILDING USE- RETAIL
- BUILDING USE- COMMUNAL AREAS AMENITIES
- BUILDING USE- PARKING
- UTILITY
- CORRIDOR
- STUDIO
- 1 BEDROOM
- 2 BEDROOM

SCALE: 1” = 60’-0”

May 23, 2025

SECOND FLOOR PLAN

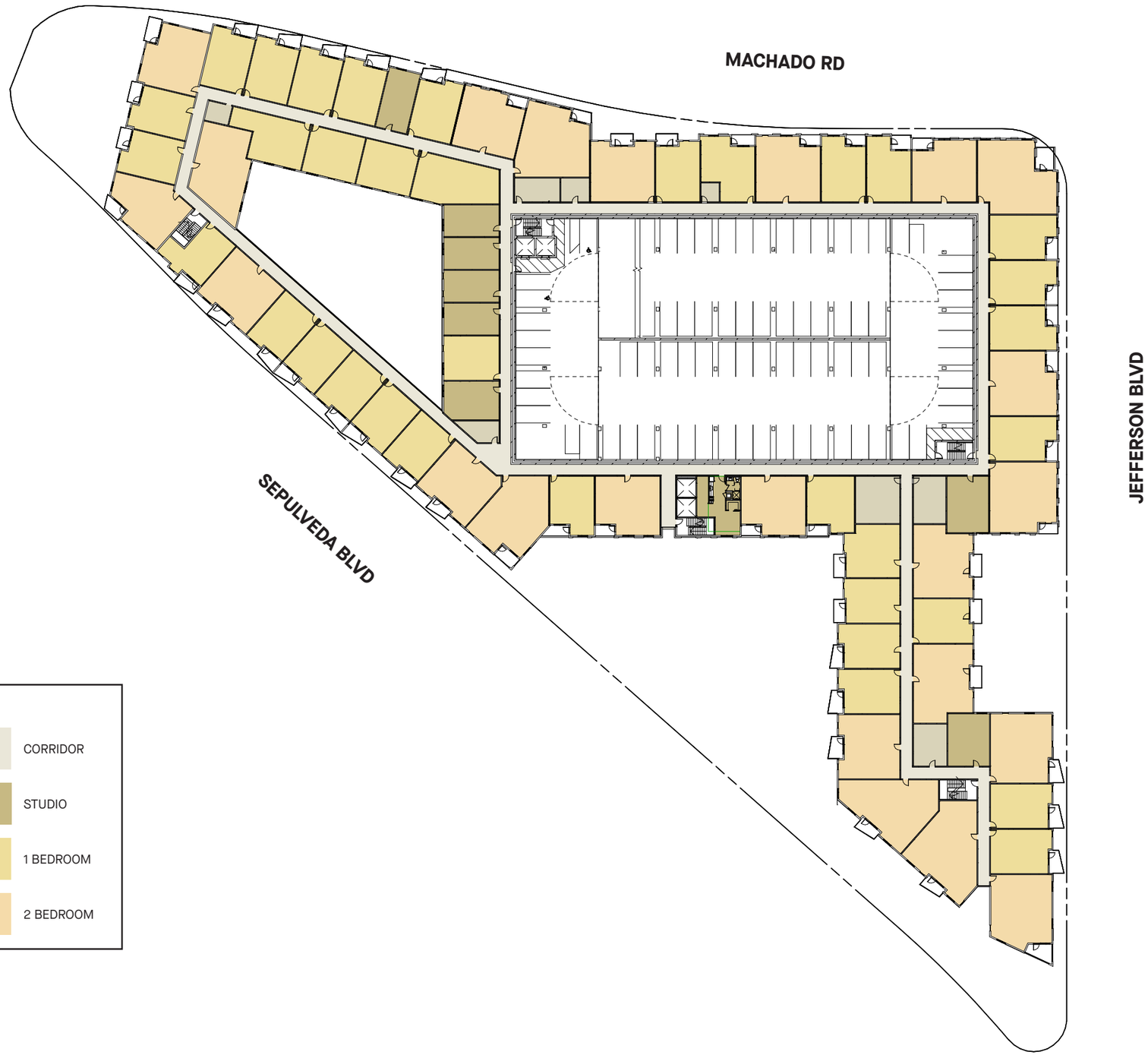
LEGEND

- BUILDING USE- RETAIL
- BUILDING USE- COMMUNAL AREAS AMENITIES
- BUILDING USE- PARKING
- UTILITY
- CORRIDOR
- STUDIO
- 1 BEDROOM
- 2 BEDROOM

SCALE: 1" = 60'-0"

May 23, 2025

TYPICAL FLOOR PLAN
(3RD TO 5TH FLOOR)



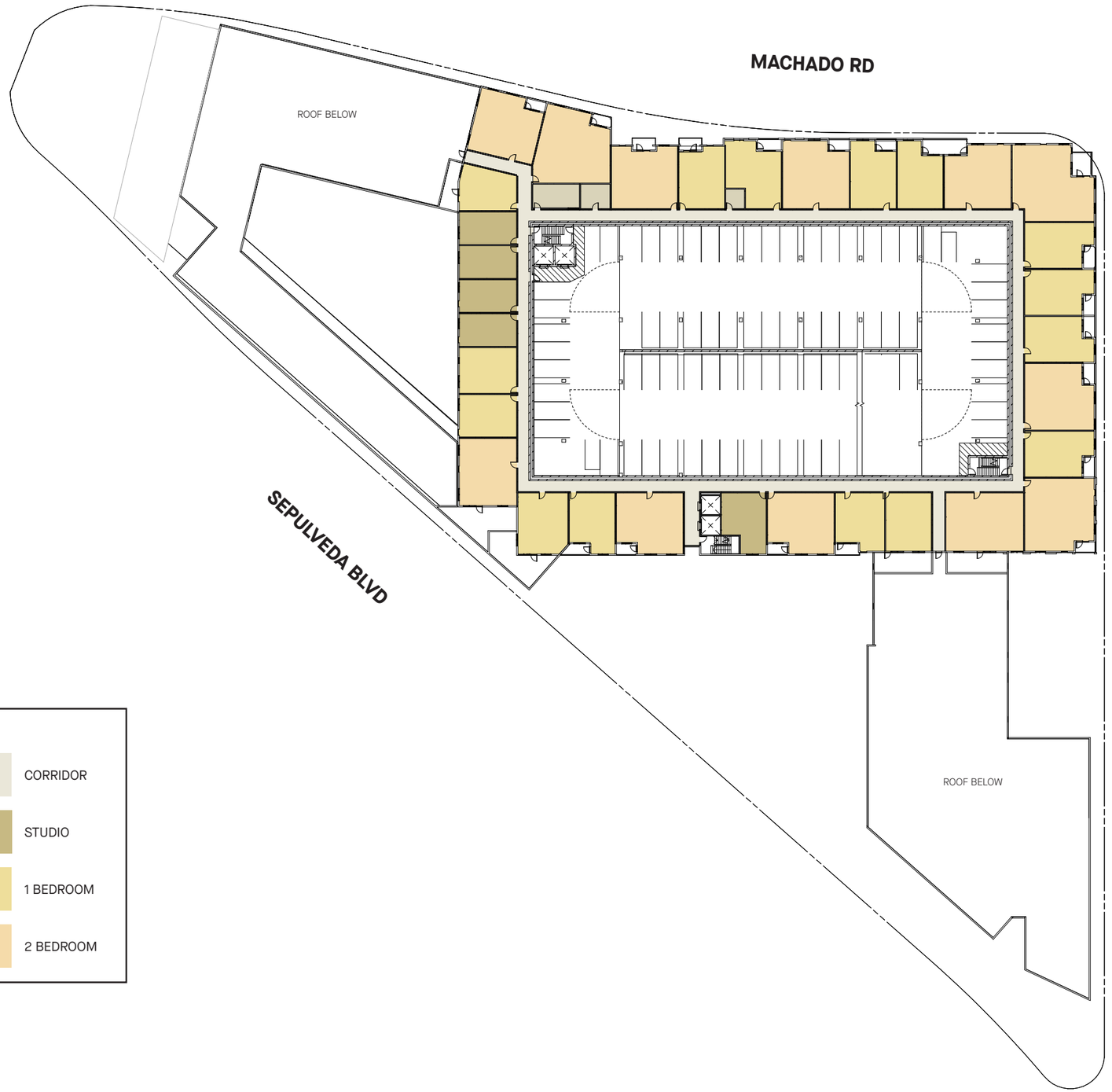
LEGEND

- BUILDING USE- RETAIL
- BUILDING USE- COMMUNAL AREAS AMENITIES
- BUILDING USE- PARKING
- UTILITY
- CORRIDOR
- STUDIO
- 1 BEDROOM
- 2 BEDROOM

SCALE: 1” = 60’-0”

May 23, 2025

SIXTH FLOOR PLAN



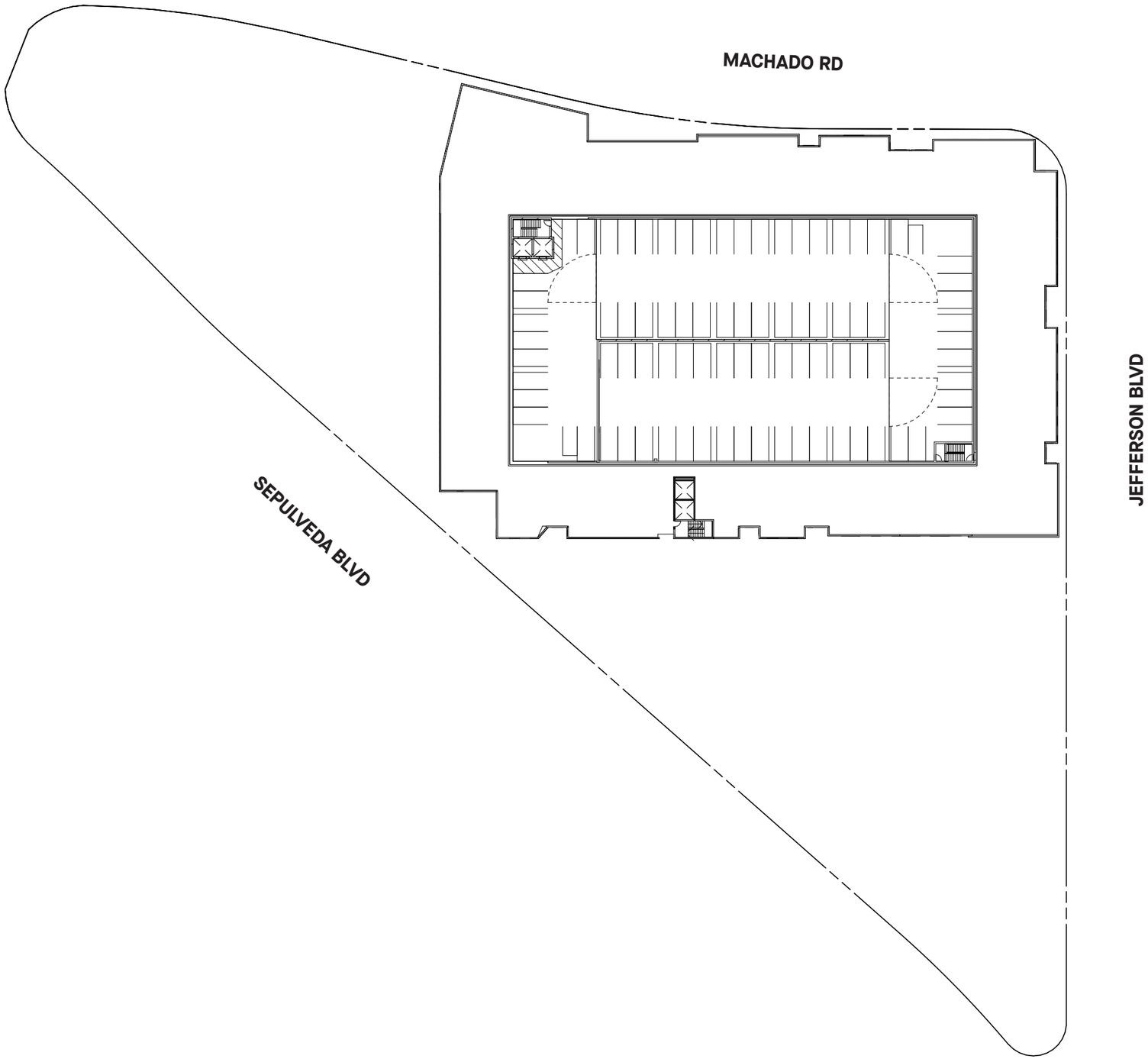
LEGEND

- BUILDING USE- RETAIL
- BUILDING USE- COMMUNAL AREAS AMENITIES
- BUILDING USE- PARKING
- UTILITY
- CORRIDOR
- STUDIO
- 1 BEDROOM
- 2 BEDROOM

SCALE: 1” = 60’-0”

May 23, 2025

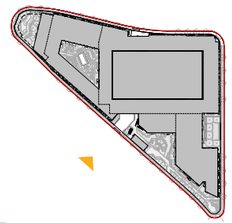
ROOF PLAN

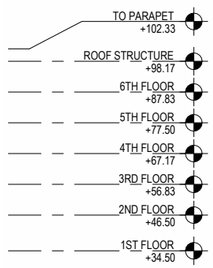


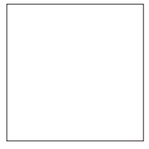
SCALE: 1” = 60’-0”

May 23, 2025

SEPULVEDA BLVD ELEVATION







PL1
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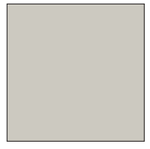

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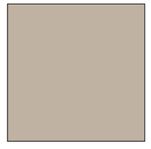

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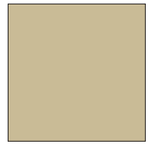

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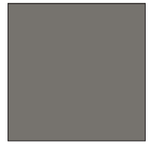

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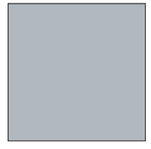
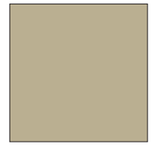


PL6
PLASTER
LIGHT BLUE GRAY

PL7
PLASTER
DARK BLUE GRAY

BR
THIN BRICK -
CHARCOAL

VW1
VINYL WINDOW -
DARK BRONZE



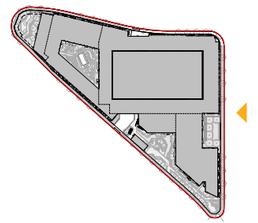
VW2
VINYL WINDOW -
TAN

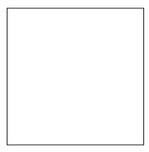
WD1
EXTERIOR WOOD
CLADDING

SCALE: 1” = 50’-0”

May 23, 2025

JEFFERSON BLVD ELEVATION





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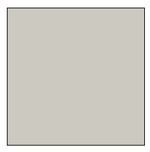

PL2
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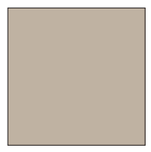
REPOSE GRAY



PL3
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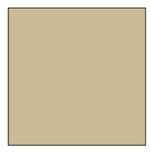

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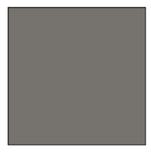

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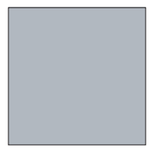

PL6
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LIGHT BLUE GRAY

PL7
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DARK BLUE GRAY

BR
THIN BRICK -
CHARCOAL

VW1
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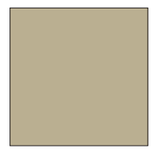


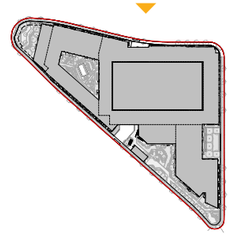
VW2
VINYL WINDOW -
TAN

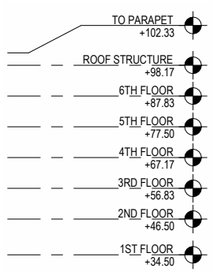
WD1
EXTERIOR WOOD
CLADDING

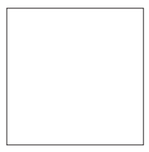
SCALE: 1” = 50’-0”

May 23, 2025

MECHADO ELEVATION







PL1
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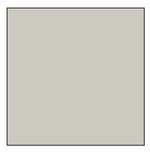
WHITE



PL2
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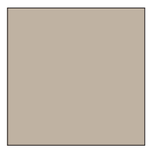
REPOSE GRAY



PL3
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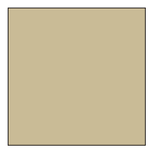
BALANCED BEIGE



PL4
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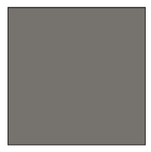
SMOOTH - TAN



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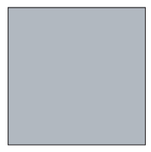

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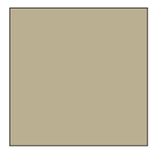
LIGHT BLUE GRAY

PL7
PLASTER
DARK BLUE GRAY

BR
THIN BRICK -
CHARCOAL

VW1
VINYL WINDOW -
DARK BRONZE



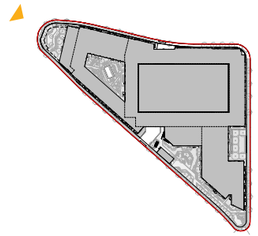
VW2
VINYL WINDOW -
TAN

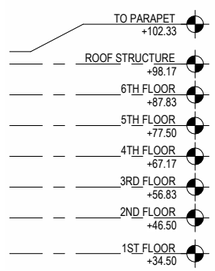
WD1
EXTERIOR WOOD
CLADDING

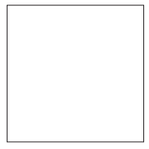
SCALE: 1” = 50’-0”

May 23, 2025

COMMUNITY PARK ELEVATION







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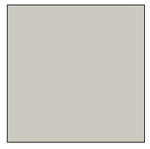

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SMOOTH -
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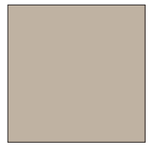

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SMOOTH -
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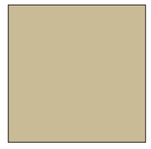

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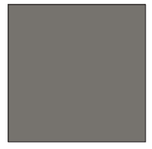
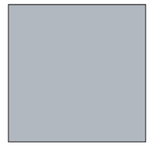
SMOOTH - TAN



PL5
PLASTER\
GRAY

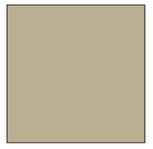


PL6
PLASTER
LIGHT BLUE GRAY

PL7
PLASTER
DARK BLUE GRAY

BR
THIN BRICK -
CHARCOAL

VW1
VINYL WINDOW -
DARK BRONZE



VW2
VINYL WINDOW -
TAN

WD1
EXTERIOR WOOD
CLADDING

SCALE: 1” = 50’-0”

May 23, 2025

Outdoor Dining: Center Plaza

The Project shall comply with Culver City outdoor dining standards as follows:

a. An unobstructed minimum 4-foot-wide clear pedestrian pathway shall be maintained at all times between the outside boundary of any outdoor dining areas and any obstruction.

b. The design of furniture, barriers, and equipment to be used within any outdoor dining area shall be high quality and harmonious and compatible with the overall architecture of the project, as well as any site furniture provided.

c. Inclement weather enclosures shall be allowed provided the enclosure is constructed with clear materials that can be stored unobtrusively within the interior of the tenant space or within the project.

d. Umbrellas shall have a minimum vertical clearance of 6 feet and 8 inches and shall not exceed a maximum height of 13 feet.

e. Portable heaters and/or fixed heaters shall be of uniform design. They shall not project beyond the limit of the outdoor dining area and shall require written approval of the City of Culver City Fire Marshall prior to placement.

f. Establishments that serve alcoholic beverages in the outdoor dining area shall provide a physical barrier that meets the following requirements. Barriers may include a variety of types including but not limited to wood panels, planters and flowerpots, and railing systems. There is no requirement for transparency.

g. All outdoor dining areas shall be accessible to the disabled in accordance with ADA standards

h. Outdoor dining areas shall be operated in a manner that meets all requirements of the Los Angeles County Health Department.

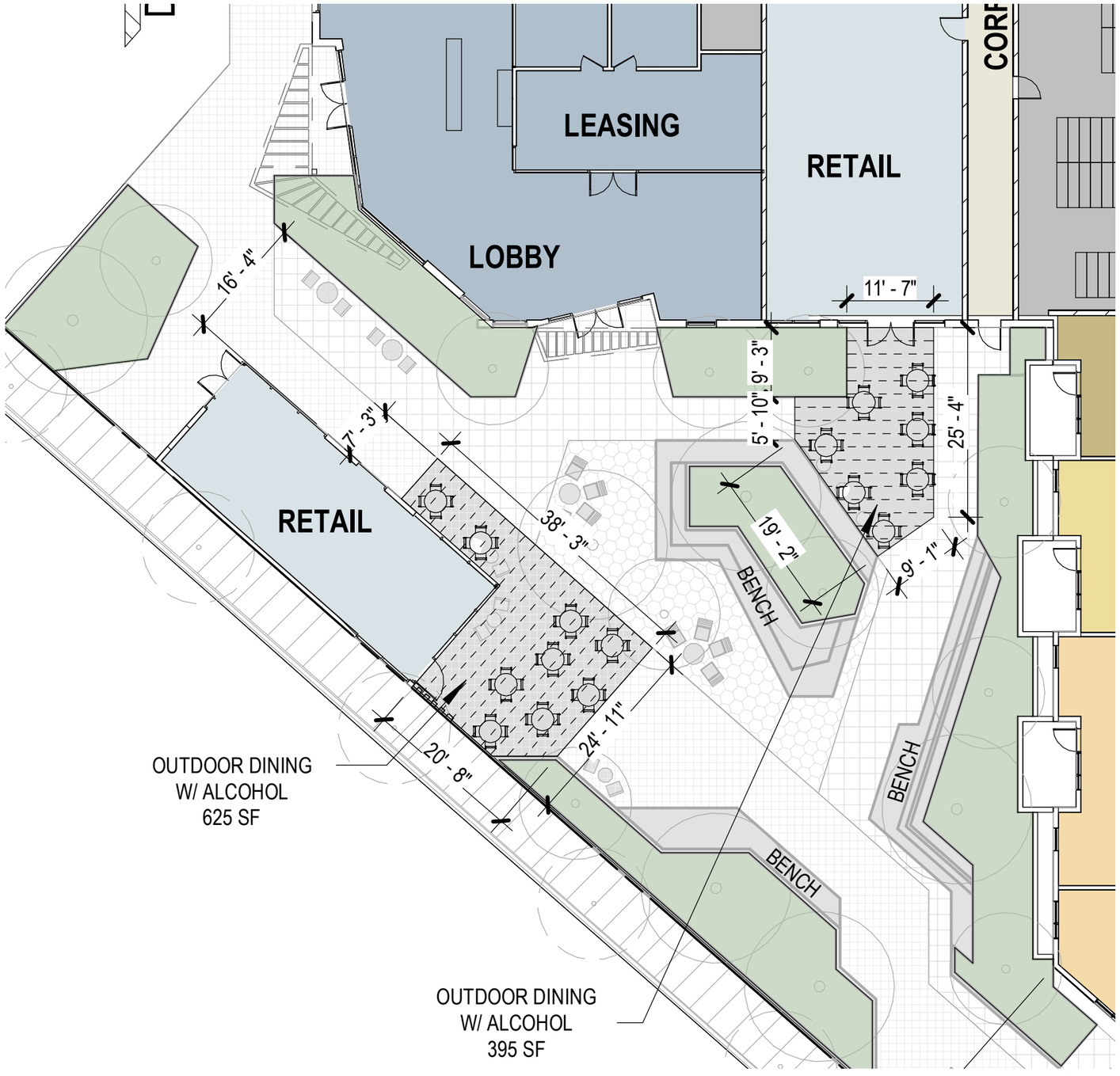
i. Restaurant management shall keep the outdoor dining area clear of litter, food scraps, and soiled dishes at all times. Trash receptacles shall be provided in the outdoor dining areas used for consuming take out items.

j. Patios and outdoor seating may be shared by multiple businesses.

k. New outdoor dining and existing outdoor dining to be modified shall require conformance review by the Current Planning Division. Conformance review shall include plans that provide furniture, landscaping, materials, barriers, lighting, heating components, umbrellas, and equipment.

Legend

Outdoor Dining W/Alcohol



SCALE: 1/16" = 1'-0"

RENDERINGS

SEPULVEDA + JEFFERSON PLAZA

MECHADO PARK

TOWN SQUARE + RETAIL PLAZA

MECHADO STREETSCAPE

Attachment 3: Updated Exhibit A
Minor Modification P2025-0092
11111 Jefferson Boulevard
ORDINANCE NO. 2021-015
P2021-0025-CP/ZCMA/DOBI/TPM

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
~~8~~	~~The Project shall meet all provisions of CCMC Section 7.05.015 - "Transportation Demand and Trip Reduction Measures". The applicant shall indicate compliance with all CCMC Section 7.05.015 Transportation Demand and Trip Reduction Measures on the Building Permit Plans to be submitted for review and approval by Transportation Department.~~ ~~The Project shall incorporate one or more of the following Trip Reduction Measures:~~ ~~1. End of trip facilities including Employee Bicycle Lockers that services the required bicycle parking condition included within this document; the applicant shall provide a design that identifies number of employees served by the facility.~~ ~~2. Public Transportation and Shared-ride Uber/Lift Information Kiosks for both ground floor and office employees; the information kiosk shall include a touch screen media device which can provide real time arrivals for various bus lines and other public transit and/or Shared-ride related information.~~ ~~3. In addition to the minimum required EV related parking spaces consistent with CCMC Chapter 17.320 - "Off-Street Parking and Loading", marked parking stalls shall be constructed with infrastructure necessary to allow for future installation of Electrical Vehicle (EV) charging and EV ready parking spaces; EV ready parking spaces shall be consistent with applicable California Green Building Code standards.~~	~~Trans., Public Works, Planning~~	~~**Special**~~	

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	~~Pursuant to the Comprehensive Plan, the project shall provide the following complement of EV ready and EV chargin stations:~~ ~~132 Total EV Capable parking spaces~~ • ~~66 EV Ready~~ • ~~66 Full EV Charging~~ ~~4. At least two low/zero emission vehicle designated parking spaces and at least one carpool/vanpool designated parking at each parking level; infrastructure ready EV spaces may be used.~~ ~~5. With approval from Public Works, designated loading areas for shared-ride vehicles along project adjacent public streets or an onsite designated loading area for shared-ride vehicles.~~ ~~6. Subsidized Shared-Ride/Uber/Lyft Service – The Project shall provide employees with a voucher or similar system for Uber/Lyft ridesharing services to facilitate use of rideshare services. The subsidy shall be for two years after Certificate of Occupancy over a two-year period. The Project owner or property management firm shall provide evidence and/or accounting annually to the City of such subsidy.~~ ~~7. Promotion of walking through a "walk to work" program in coordination with the on-site office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.~~			

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	~~8. Two bicycle sharing spaces with accompanying bicycles to be owned, insured, and maintained by the Project's property management company.~~ ~~9. TAP Cards – Upon receipt of C of O and when requested by a Project tenant or business, the applicant shall provide a 50% subsidy for the cost of TAP Cards for a period of one year or alternatively may offer a cash out bonus to individuals who opt to use other modes of commuting options such as carpools, car share, shuttles, bicycles, or walking. The cash out bonus will count toward 100% of the obligation.~~ ~~The developer will provide evidence of the TAP card or cash out bonus to the Current Planning Division by no later than the first month of each calendar year starting the first year following Certificate of Occupancy~~			
19	~~The proposed opening of the center median on Machado Road planned to allow turning of large trucks that will service the loading dock shall be minimized to only allow requirements of the truck turning templates and shall be extended using delineators to prevent U-turns.~~ The project shall install NO U-Turn signs facing eastbound traffic on Machado Road to prohibit them from making a U-turn at mid-block locations and at the intersection of Machado Road/Jefferson Boulevard. Changes to the center median on Machado Road shall be shown on the project improvement plans for review and	~~Building Safety/ Current Planning~~ Public Works Mobility	Standard	

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	approval by the different City departments.			
~~21~~	~~The project needs to show vehicular turning templates at the internal 90-degree angle driveway leading to the underground parking. The project is required to install mirrors to improve visibility at such sharp corners.~~	~~Public Works Mobility~~	~~Special~~	
26	The Applicant shall implement the Transportation Demand Management (TDM) Measures that have been adopted through the revised Comprehensive Plan. ~~The project shall submit, within 30 days of City Council approval of the project, a more detailed Transportation Demand Management (TDM) program and associated monitoring for review and approval by the Public Works, Transportation, and Community Development Departments. The TDM program shall follow the submitted project plan and includes the following:~~ ~~Commute marketing program, a strategy that involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes educational and promotional materials, and a TDM Coordinator from building management to oversee the TDM program, such as field questions, manage regular updates of transportation materials for the Project Site, and coordinate carpool and ridesharing options.~~ ~~Off-Street parking pricing, a strategy implements parking pricing for spaces within the Project Site for office~~	Public Works Mobility	Special	

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	~~employees. This would mean that employees of the office land use would need to pay for a parking spot within the Project Site garage, separate from the cost of the lease for the office space.~~ ~~Multiple mobility features, including short- and long-term (26 and 71, respectively) bicycle parking, a bike and scooter share station at the corner of Machado/Sepulveda, a designated dropoff area for rideshare, a designated area for food (grocery and restaurant) loading, streetscape and pedestrian improvements, new street lights and sidewalk improvements, a new signal and various crosswalk improvements, improved bus stops, a project sponsored fleet of E-assist bicycles to help in serving project residents and employees, and accessible walkways connecting the uses within the site and with the public pedestrian network.~~ ~~Carshare parking, a strategy that involves saving two parking spaces for carshare vehicles within either the commercial or residential parking areas.~~ ~~Transit subsidies, a strategy that includes providing transit subsidies for both employees and residents of the project to encourage further CityBus and the metro bus services ridership.~~ ~~Guaranteed ride home program, a project sponsored guaranteed ride home for project employees who came to work without their own car in the event of an unexpected situation or emergency when~~			

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	~~walking, biking, carpooling, or taking transit home would not be feasible.~~			
~~101~~	~~The project shall design and construct S-shaped center island on Machado Road at its intersection with Heritage Place-project driveway to prevent the left-turn out of each of Heritage Place and the project driveway, as well as the straight through movement across Machado Road at the same intersection. This new island will be extended using delineators to also prevent U-turns on Machado Road. Changes to the center median on Machado Road shall be shown on the project improvement plans for review and approval by the different City departments.~~	~~Public Works Mobility~~	~~Special~~	
116	A. An Affidavit for Acceptance of Conditions shall be executed by the Applicant/Property Owner and recorded in the County Recorder's Office, on a form provided by the Current Planning Division and in form and substance acceptable to the City Attorney and ~~Community Development~~ Planning and Development Director, certifying the agreement to provide the ~~required~~ Public Open Space ~~(Machado Park – 13,800 square feet) Community Benefit~~ as part of the Project. The Project approvals shall not become operative if the Applicant/Property Owner fails to sign the affidavit~~, and the project permit granting increased density shall be null and void~~. If the Applicant/Property Owner fails to maintain the required Public Open Space ~~Community Benefit~~, then the Project approvals shall be referred to the Planning Commission for consideration of revocation, pursuant to Chapter 17.660 of the Zoning Code and the matter may be referred to the City		Special	

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	Attorney for enforcement pursuant to Chapter 17.650 of the Zoning Code. B. A Public Open Space Covenant and Agreement shall be executed by the Applicant/Property Owner and recorded in the County Recorder's Office, on a form provided by the Current Planning Division and in form and substance acceptable to the City Attorney and ~~Community Development~~ Planning and Development Director, requiring the ~~Project Community Benefit~~ Public Open Space ~~(Machado Park – 13,800 square feet)~~ to be maintained in a clean and sanitary condition and open and available to the public ~~during normal public park operation hours as determined by the City~~ from dawn to dusk for the life of the Project. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Current Planning Division. C. For the Public Open Space area (~~Machado Park – 13,800 square feet)~~, the Director, or his or her designee, shall conduct follow-up inspections annually for five years to ensure that the public open space area is open and publicly accessible and maintained in a manner consistent with the approved Comprehensive Plan.			
~~136~~	~~Pursuant to the Comprehensive Plan, all large truck loading will be managed to take ingress from Machado Road, pulling into a dedicated loading area entirely within the garage and then backing up into the grocery store loading dock. Truck back-up warning beeper noise is to be contained within the garage with garage noise attenuating features including full height walls abutting the driveway entries and sound attenuation panels installed~~	~~Current Planning~~	~~Special~~	

Attachment 3: Updated Exhibit A
Minor Modification P2025-0092
11111 Jefferson Boulevard
ORDINANCE NO. 2021-015
P2021-0025-CP/ZCMA/DOBI/TPM

NO.	CONDITIONS OF APPROVAL	Agency	Source	Compliance Verification
	~~along garage ceilings and walls adjacent to the loading dock subject to City approval.~~			

Attachment 4

11111 JEFFERSON PROJECT

Addendum to the Certified EIR for 11111 Jefferson Boulevard Mixed-Use Project EIR

Prepared for
City of Culver City

April 2025

ESA

11111 JEFFERSON PROJECT

Addendum to the Certified EIR for 11111 Jefferson Boulevard Mixed-Use Project EIR

Prepared for
City of Culver City

April 2025

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
esassoc.com

ESA

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Appendix

11111 JEFFERSON PROJECT

Addendum to the Certified EIR

Environmental Checklist

Project Title:	11111 Jefferson Project
Previous CEQA Document State Clearinghouse Number:	SCH No. 2020090329 – 11111 Jefferson Boulevard Mixed-Use Project
Lead Agency Name and Address:	City of Culver City Planning Division 9770 Culver Boulevard, Culver City, CA 90232
Contact Person and Phone Number:	Emily Stadnicki, Current Planning Manager (310) 253-5727
Project Location:	The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230.
Project Sponsor's Name and Address:	Gen-Land, LLC c/o LPC West, Inc. 390 N. Pacific Highway, Suite 3100 El Segundo, CA 90245
General Plan Designation(s):	Mixed Use Corridor 2 (MU-2)
Zoning:	Planned Development (PD-16)
Description of Project:	The Approved Project includes 230 residential dwelling units, 66,500 square feet (sf) of commercial floor area, 28,200 sf of public open space, podium and one-level of below-grade parking in a 5-story (above ground) building (67-feet tall). The Modified Project would construct a six-story (67-feet tall) commercial and residential development with an wrap scheme parking structure (no subterranean parking). The building would contain 2,000 sf of commercial space and 344 residential units, up to

	502 parking spaces, and associated amenities. Including parking and loading, the Modified Project's proposed floor area (with parking) would be approximately 566,812 sf – 11,591 sf more than the Approved Project's 555,221 sf. For a detailed project description, refer to **Section 2**, *Project Description*, below.
Surrounding Land Use and Setting:	The following describes each land use surrounding the Project Site: • North – Studio Village and a private K-12 school (ECF) • East– Studio Village Shopping Center and the Blanco/Culver Crest neighborhood • South and West –Sunkist Park neighborhood, retail, and Temple Akiba
Public Agencies Whose Approval Is Required:	Los Angeles Regional Water Quality Control Board, South Coast Air Quality Management District, and Other agencies as needed.

1.0 Introduction

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the 11111 Jefferson Boulevard Mixed-Use Project (Case Nos. P2021-0025-CP/DOBI/TPM/ZMCA, State Clearinghouse No. 2020090329), which was certified by the City of Culver City (City) on September 27, 2021 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (Modified Project) to 11111 Jefferson Boulevard Mixed-Use Project (Approved Project) and demonstrates that the proposed modifications to the Approved Project do not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162 and 15163.

1.1 Background

The City, serving as the Lead Agency, prepared an Environmental Impact Report (EIR) for the Approved Project to assess potential environmental impacts of the Project, as described below.

The EIR concluded that, with the implementation of all feasible mitigation measures, all of the Approved Project's environmental impacts would be less than significant and no significant and unavoidable impacts would occur.

On September 27, 2021, the City certified the Final Project EIR and adopted CEQA Findings and a Mitigation Monitoring Program. The City approved entitlements to develop the Project Site with 230 residential units and 66,500 sf of commercial uses. Entitlements included approval of a Zoning Map Amendment to designate the Property as PD-16; a comprehensive plan ("Comprehensive Plan") to establish development standards and design for the development; a Community Benefits Request; a density bonus to allow increased project density; a tentative parcel map to consolidate four parcels into one; and an administrative use permit to allow alcoholic beverage sales and outdoor dining for future uses. (P2021-0025-CP/ZCMA/DOBI/TPM.) Subsequent to approval of the Approved Project, Gen-Land, LLC c/o LPC West, Inc. (Project Applicant) has revised the Project (Modified Project).

Subsequent to the EIR's certification, in recognition of the current global economic forces, the Approved Project is no longer viable. Therefore, modifications to the Approved Project and its Comprehensive Plan are necessary to develop a viable project at the Project Site. The primary differences between the Approved Project and Modified Project are that the Modified Project is proposing an increase in residential units and significant reduction in the contemplated commercial uses, while eliminating the subterranean parking. Further comparison of the Approved Project and the Modified Project are discussed in Section 2, *Project Description,* below.

Both the Approved Project (as analyzed in the Certified EIR) and the Modified Project (analyzed in this Addendum) are discussed further below.

1.2 CEQA Authority for an Addendum

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

Substantial changes are proposed in the project which, will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

1) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Project would not result in any new significant impacts, nor would it increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or increased significant impact. Therefore, the modifications resulting from the Modified Project do not meet the criteria for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 and CEQA Guidelines Section 15162 and 15163.

2.0 Project Description

2.1 Environmental Setting

2.1.1 Project Location

The Project Site is located at 11111 Jefferson Boulevard in the southern part of the City. The Project Site is generally bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west. The Project Site location for the Modified Project is the same as the Approved Project.

2.1.2 Existing Conditions

The 149,553 sf (3.43 acre) Project Site is currently a vacant, undeveloped lot, with the exception of a small concrete paved parking lot in the northwestern portion of the Project Site. At the time of the Certified EIR, the Project Site consisted of three single story commercial buildings, surface parking, a parking lot that served the ECF, and ornamental landscaping. Since the certification of the EIR, the buildings and associated surface parking, previously on-site were demolished, with the exception of the small parking lot, as part of the Approved Project. Further construction of the Approved Project did not occur. **Figure 1**, *Project Location - Aerial Photograph*, illustrates the Project's Site's Existing Conditions.

2.1.3 Surrounding Land Uses

The Project Site is located in the Studio Village neighborhood in the southern part of Culver City. The Project Site is surrounded by the Sunkist Park neighborhood to the west and southwest, the Heritage Park and Lindberg Park neighborhoods to the north, the Studio Village Shopping Center to the east, and the Blanco Park neighborhood to the southeast. Primary regional access is provided by the San Diego Freeway (I-405) and the Marina Freeway/Expressway (SR-90), both located approximately 0.7 miles southwest of the Project Site.

Nearby land uses north of Machado Boulevard include a residential neighborhood (Heritage Park) and a private K-12 school (ECF). To the east across Jefferson Boulevard is the Studio Village Shopping Center and surface parking lot. South and west of the Project Site across Sepulveda Boulevard is a temple (Temple Akiba) and commercial uses. There are also residential uses north of Temple Akiba along Sepulveda Boulevard (Studio Village Townhomes), backing the commercial uses along Sepulveda Boulevard (Sunset Park Neighborhood), and to the south of the Studio Village Shopping Center (Blanco Park Neighborhood).

The surrounding land uses of the Project Site applicable to the Modified Project are the same as analyzed under the Approved Project as part of the Certified EIR.

2.1.4 Planning and Zoning

The Project Site is located in the Studio Village neighborhood in the southern part of Culver City. At the time of certification of the Draft EIR, the former General Plan Land Use designation for the Project Site was "General Corridor Commercial," which allowed commercial uses with an emphasis on community serving retail. Per the Culver City Zoning Code (Zoning Code) at the time, the majority of the Project Site was zoned "Commercial General" (CG). The northernmost parcel (APN 4215-001-020) adjacent to Machado Road was split-zoned CG and Single-Family (R-1).

Path: U:\GIS\GIS\Projects\2024xxx\D202401478_00_11111_Jefferson_Addendum\03_Project\CommunityDevelopment.aprx Figure 1 - Project Location, msaucedo 3/18/2025

SOURCE: ESA, 2025; NearMap 2025

11111 Jefferson Project EIR Addendum

Figure 1
Project Location – Aerial Photograph

ESA

The Approved Project changed the zoning designations for the Project Site to "Planned Development" (PD), which required the adoption of a Comprehensive Plan to serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[1]

Effective on October 9, 2024, the General Plan Land Use designation for the Project Site is "Mixed Use Corridor 2" (MU-2), which allows commercial moderate-scale mixed use, residential, general and neighborhood serving commercial uses per the Zoning Code Section 17.220.010(C). The Project Site is zoned "Planned Development" (PD-16), which allows for large-scale, multiple-family residential and commercial complexes developed as a planned district, and sites suitable for similar large-scale development per the Zoning Code Section 17.240.010(A).

The Modified Project is proposing to maintain the spirit of the Comprehensive Plan by developing the site with high-quality residential uses that provide more affordable housing than originally contemplated.

2.2 Project Summary

2.2.1 Overview of Approved Project

The Approved Project proposed to construct a mixed-use residential and commercial development with a total building area of 555,221 sf inclusive of: 230 residential units including 19 units affordable to very low income households, for a total of 244,609 sf residential area (including the residential lobby and residential amenity room); 66,500 sf of commercial floor area, inclusive of 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and cafe, 3,900 sf retail spaces, 1,950 sf gym/studio fitness center, and 11,450 sf of second floor office uses within a five-story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floors of the building. A total of 653 parking spaces would be provided, inclusive of 308 spaces for residents, 311 spaces for commercial, and 34 spaces for the ECF were proposed. The Approved Project would install a new traffic signal at the Project driveway on Sepulveda Boulevard, where it intersects with Janisann Avenue to provide a safe crossing for pedestrians to access the Project Site from the Sunkist Park neighborhood across Sepulveda Boulevard. The Approved Project included private and publicly accessible open space including: a park open to the public at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), a courtyard at the entrance of Sepulveda Boulevard across from Janisann Avenue (Entry Courtyard), and an internal, open air courtyard with amenities located at the third level of the development to serve the residential units on the third through fifth levels.

[1] City of Culver City Zoning Code, Title 17, Sections 17.560, Comprehensive Plans, http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca$anc=JD_17.560.005. Accessed September 21, 2020.

2.2.2 Modifications to Approved Project

The Modified Project would significantly reduce the previously contemplated commercial uses and construct mostly residential uses. The components of the Modified Project are compared to those of the Approved Project in **Table 1**, *Comparison of Modified Project to the Approved Project.*

TABLE 1
COMPARISON OF MODIFIED PROJECT TO THE APPROVED PROJECT

Land Use	Approved Project	Modified Project	Difference
Residential			
Studio	54 du	51 du	-3 du
1 Bedroom	113 du	175 du	+62 du
2 Bedroom	63 du	118 du	+55 du
Subtotal Residential Units	*230 du*	*344 du*	*+114 du*
Affordable Units	19 du	52 du	+33 du
Commercial Component			
Commercial/Retail/Office/restaurant/Gym	66,500 sf	2,000 sf	-64,500 sf
Open Space			
Publicly Accessible Open Space	28,800 sf	17,520sf	-11,280 sf
Common Open Space (for Residents)	24,000 sf	19,355 sf	-4,645 sf
Private Open Space (Balconies)	13,560 sf	15,600 sf	+2,040sf
Total Open Space Provided	*66,360 sf*	*52,475 sf*	*-13,886 sf*
Lobby/Amenity			
Lobby (including mailroom)	2,500 sf	4,975 sf	+2,475 sf
Amenity Space	2,500 sf	1,135 sf	+1,365 sf
Co-Working Space (Amenity)	0 sf	1,617 sf	+1,617 sf
Gym (Residential Amenity)	0 sf	2,515 sf	+2,515 sf
Total Amenity Square Footage (Excluding Lobby)	*2,500 sf*	*5,267`sf*	*+2,767 sf*
Parking			
Parking Area	311,109 sf	181,387 sf	-129,722 sf
Subterranean Levels	1 level	0 levels	-1 level
Vehicle Parking Spaces	653 spaces	502 spaces	-151 spaces
ECF Parking[a]	34 spaces	34 spaces	Same
Bicycle Parking Spaces	97 spaces	97 spaces	Same
Floor Area			
Total Project Square Footage	555,221 sf	566,812 sf	+11,591 sf
FAR (with parking)	3.71 FAR	3.79 FAR	+.08 FAR
Height			
Building levels/Maximum Height	67-ft tall (5-stories)	67-ft tall (6-stories)	Same

du = dwelling unit; sf = square feet

a. The ECF parking spaces are a relocation of the 34 ECF parking stalls previously located on-site and demolished as part of the Approved Project.

SOURCE: ESA, 2025.

The Modified Project would be four to six stories tall (varying elevations) and have a maximum height of 67 feet, similar to the Approved Project that was also 67 feet tall, but within 5-stories. The Modified Project would result in the development of 344 residential units, as opposed to 230 residential units under the Approved Project, for an increase of 114 units. The Modified Project would include 52 total affordable units (26 very low income and 26 moderate income), as compared to the Approved Project's 19 affordable units (all very low income), for an increase of 33 affordable units. The total developed floor area on the Project Site, including the parking area, would nominally increase from 555,521 sf to 566,812 sf under the Modified Project (~2% increase), resulting in an increase of 11,591 sf. As such, the FAR (with parking) would increase from 3.71:1 under the Approved Project to 3.79:1 under the Modified Project. As shown in Table 1, the Modified Project would provide a total of 52,475 sf of open space, inclusive of 17,520 sf of community park space, 19,355 sf of common open space for residents and 15,600 sf of private balcony space.

Figure 2, *Conceptual Site Plan – Modified Project*, provides the conceptual site plan for the Modified Project. **Figure 3,** *1st Floor Plan*, illustrates the Modified Project's 1st floor plan. As can be seen in the figures, the ground floor would feature residential uses fronting all three sides of the Project Site. Two community parks would be provided, a 4,630 sf park on the corner Sepulveda Blvd. and Machado Road, and a 12,890 sf park on Sepulveda Blvd. **Figure 4**, *2nd Floor Plan*, illustrates the 2nd floor plan of the Modified Project. **Figure 5,** *6th Floor Plan*, illustrates the Modified Project's 6th floor plan. **Figure 6,** *Roof Plan*, illustrates the Modified Project's roof plan.

As can be seen in the floor plans, residential units would be distributed within all stories of the development, around the Project's centrally located spaces as provided in the proposed wrap scheme, eliminating the need for any subterranean parking. **Figure 7**, *Elevations – Jefferson Boulevard and Sepulveda Elevations*, and **Figure 8**, *Elevations – Community Park and Machado Elevations*, provide views of the Modified Project's elevations from surrounding vantages. **Figure 9**, *Building Sections*, provides a cross section view of the Modified Project's five levels. **Figure 10**, *Renderings*, provides illustrative renderings of the Project from various vantages in around the Project Site.

The Modified Project's above ground parking in levels one through six would provide a total of 502 spaces, a reduction of 151 spaces compared to the Approved Project's 653 spaces. In addition, the Modified Project would provide 97 bicycle parking spaces, the same as the Approved Project. As shown in Figure 2, access to the internal parking structure would be provided from two driveways, one off Sepulveda Boulevard and one off Machado Road. Additionally, as with the Approved Project, the Modified Project would install a new traffic signal at the Project driveway on Sepulveda Boulevard, where it intersects with Janisann Avenue.

Construction of the Modified Project would commence as early as July 2026 and be completed in July 2028. The Approved Project was assumed to be constructed over 26 months and as such, the Modified Project's construction would be two (2) months less than the Approved Project. Construction of the Modified Project would not require excavation for a subterranean parking level thereby eliminating the associated soil hauling and excavation activities under the Approved Project. The Approved Project was assume to require up to approximately 88,000 cubic yards (CY) of earthwork that would be excavated and exported from the Project Site to a maximum depth of 25 feet below grade. Under the Modified Project, soil hauling would be limited to site preparation and building foundations resulting in 19,750 CY. As with the Approved Project, construction staging would be entirely internal to the Project Site under the Modified Project.

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SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 2
Conceptual Site Plan – Modified Project

ESA

SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 3
1st Floor Plan

ESA

SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 4
2nd Floor Plan

ESA

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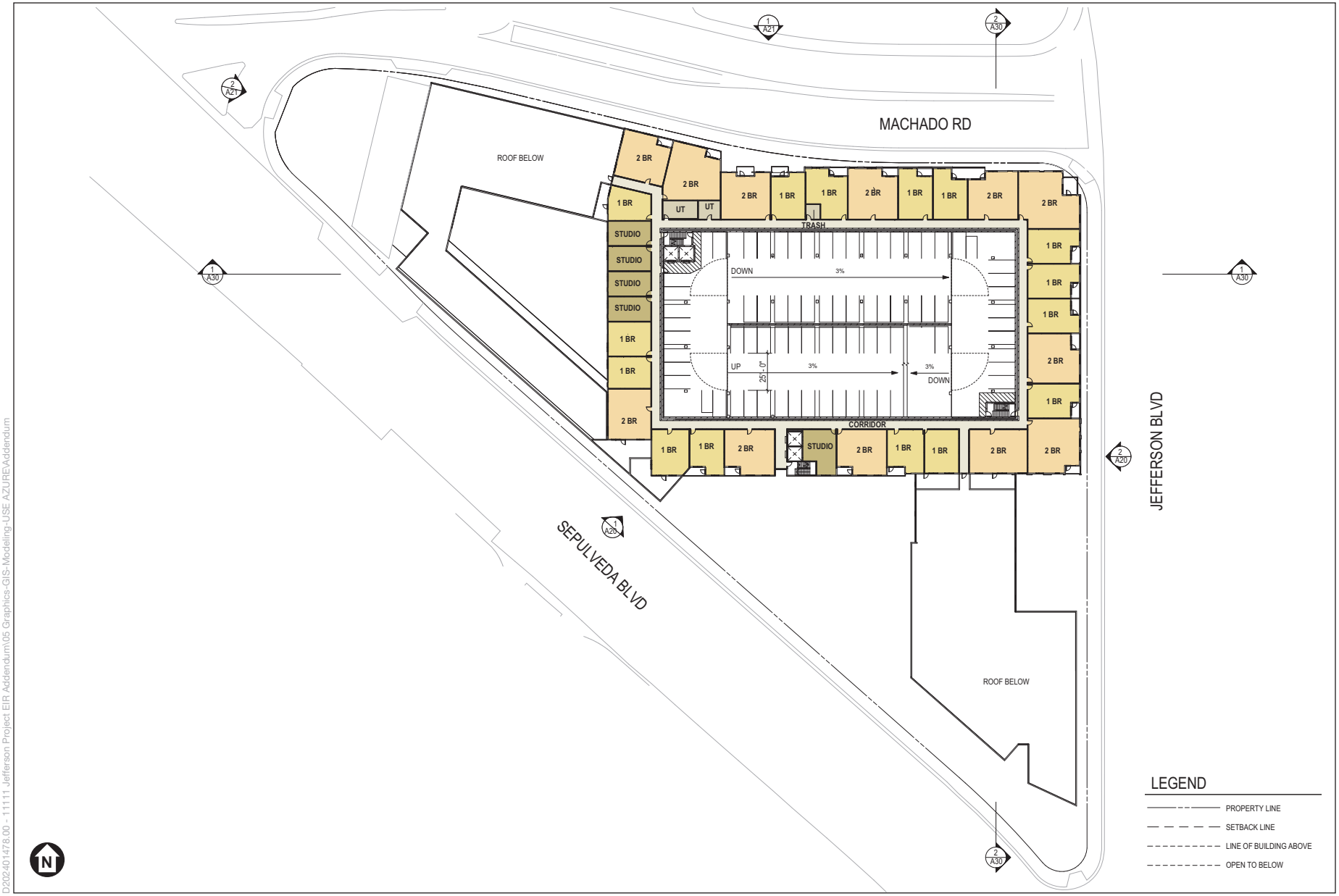
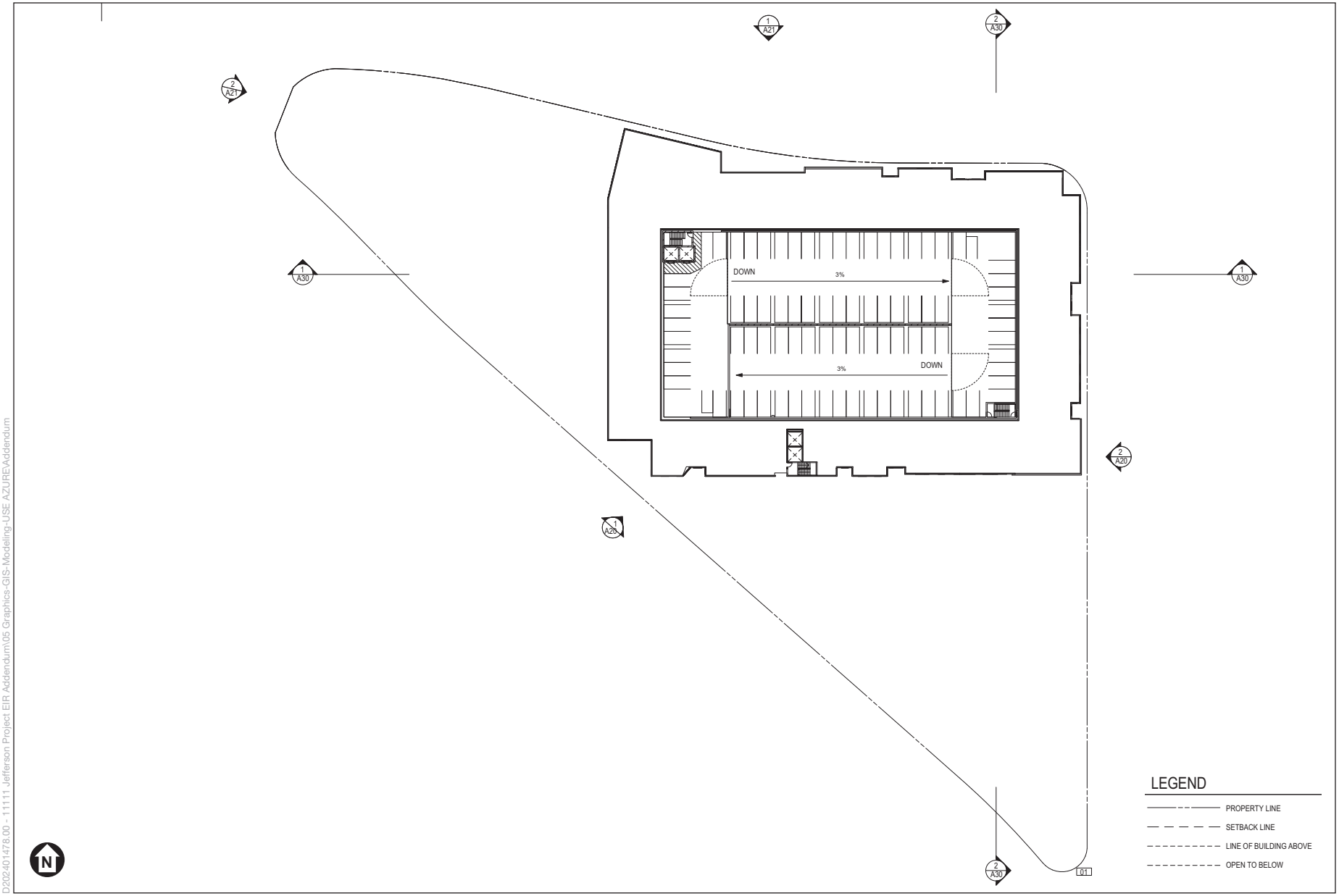


SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 5
6th Floor Plan

ESA



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SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 6
Roof Plan

ESA

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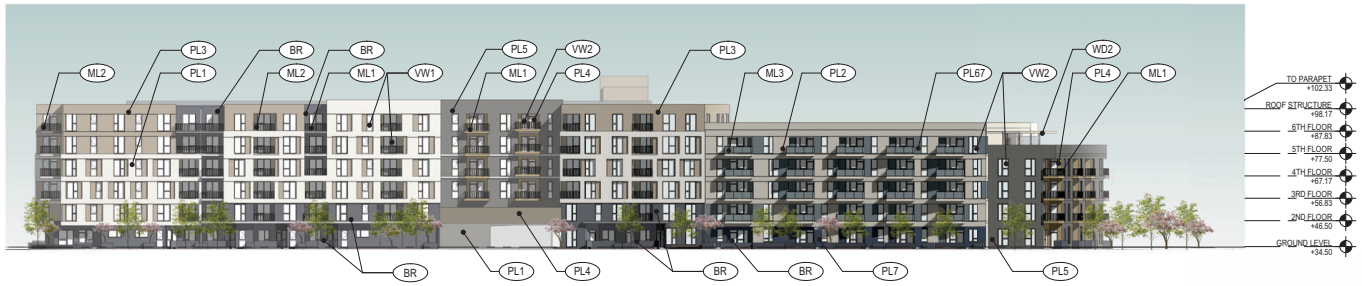
SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 7
Elevations – Jefferson Boulevard and Sepulveda Elevations

ESA

Community Park Elevation



Machado Elevation

MATERIAL BOARD

LEGEND

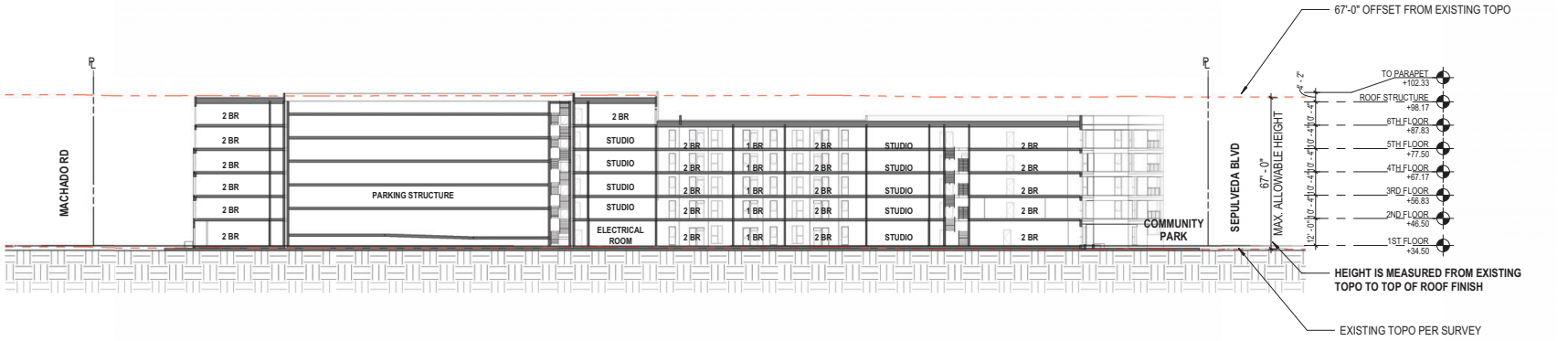
- BR BRICK - CHARCOAL
- PL1 PLASTER - WHITE
- PL2 PLASTER - REPOSE GRAY
- PL3 PLASTER - BALANCED BEIGE
- PL4 PLASTER - TAN
- PL5 PLASTER - GRAY
- PL6 PLASTER - LIGHT BLUE GRAY
- PL7 PLASTER - DARK BLUE GRAY
- VW1 VINYL WINDOW - DARK BRONZE
- VW2 VINYL WINDOW - TAN
- ST STOREFRONT - DARK BRONZE
- ML1 METAL RAILING - DARK BRONZE
- ML2 METAL RAILING - WHITE
- ML3 METAL RAILING PERFORATED PANEL-LIGHT BLUE GRAY
- WD1 EXTERIOR WOOD CLADDING
- WD2 WOOD CANOPY

SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 8
Elevations – Community Park and Machado Elevations

ESA



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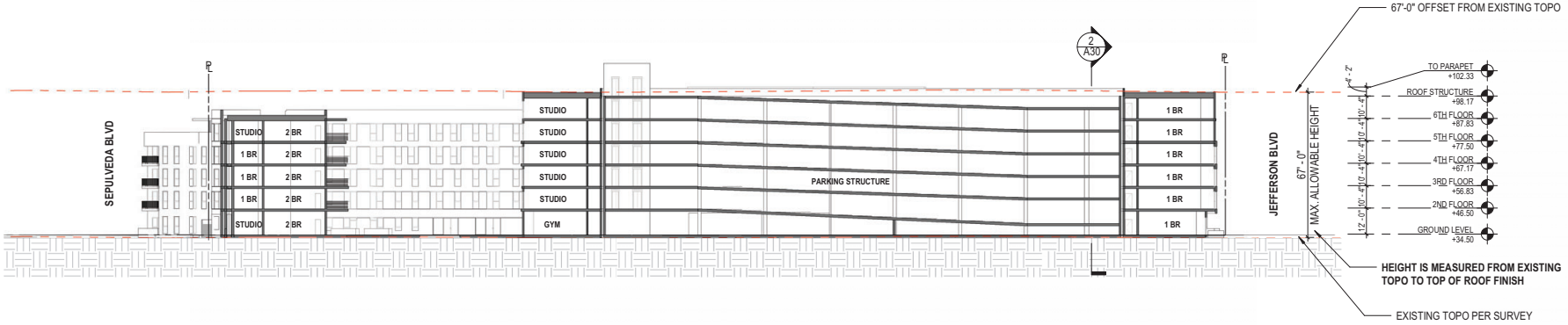

Section W-E

SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 9
Building Sections

ESA

SEPULVEDA & JEFFERSON CORNER

MACHADO COMMUNITY PARK

SEPULVEDA COMMUNITY PARK

MACHADO RD

D2024014780.00 - 11111 Jefferson Project EIR Addendum\05 Graphics-GIS-Modeling-USE AZUREAddendum

SOURCE: KFA, 2025

11111 Jefferson Project EIR Addendum

Figure 10
Renderings

ESA

2.2.3 Sustainability Features

As with the Approved Project, energy efficiency, water conservation, and the reduction of greenhouse gas emissions would be considered in the design, construction, and operation of the Modified Project building and its proposed new uses. Some of the Modified Project's proposed design features that would contribute to energy efficiency include energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping. All Modified Project components would, at a minimum, meet Culver City's mandatory Green Building Program requirements. The Modified Project would supply 1 kW of solar photovoltaic power. In accordance with the CALGreen Code, infrastructure for EV charging stations for the residential uses on the Project Site would be provided and meet local applicable Codes. The Modified Project would include 100 EV capable spaces, 50 EV charging stations, and 50 EV-ready spaces.

2.2.4 Project Design Features

The Modified Project would implement the same Project Design Features as the Approved Project, which are listed below.

Noise

PDF-NOISE-1 (Project Construction Schedule): Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).

PDF-NOISE-2 (Mechanical Equipment Noise): All mechanical equipment and/or ventilation systems not fully enclosed will be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) from 7:00 AM to 10:00 PM and 50 dBA L_{eq} from 10:00 PM to 7:00 AM at the neighboring property lines including the north and west property lines per sound level limits of the Culver City Noise Element.

PDF-NOISE-3 (Construction Rules Sign): During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City, shall be posted on the Property in a location that is visible to the public. These names and telephone numbers shall also be made available to adjacent property owners and occupants to the satisfaction of the Planning Manager and Building Official.

PDF-NOISE-4:[2] The following noise features shall be complied with at all times:

a) No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment;

b) All construction equipment shall be properly maintained to minimize noise emissions;

c) If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors;

[2] Note that the language regarding consistency with the prior Noise Element has been removed, however, the noise features are identical to those identified for the Approved Project.

d) Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building;

e) The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.

PDF-NOISE-5 (Noise Control - Permanent Amplified Sound Systems): Permanent outdoor amplified sound systems that will operate on a regularly scheduled ongoing basis shall be designed so as not to result in a meaningfully perceivable increase in noise beyond the Project Site. Specifically, outdoor amplified sound systems shall not result in an increase of 3 dBA Leq over existing conditions at the Project property line. All speakers shall have a minimum setback of 25 feet from the Project property line and shall be directed internally and shielding from off-site uses. A qualified noise consultant shall provide written documentation that the design of the system(s) complies with the maximum noise level.

Public Services- Fire Protection

PDF-FIRE-1 (Fire Protection Devices): The Project would be equipped with fire alarms, fire sprinklers, and an emergency radio response system.

PDF-FIRE-2 (Submittal of Plans to CCFD for Review/Approval): Plans for the proposed new building, fire lanes and associated turnarounds, fire hydrant locations, and associated fire prevention/suppression equipment, will be submitted to the CCFD for review and approval.

Public Services- Police Protection

PDF-POL-1 (Project Site Security and Access During Construction): During construction of the Project the Project Site will be enclosed with security fencing, lit with security lighting, and patrolled periodically by security personnel.

PDF-POL-2 (Project Site Security and Access During Operation): During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents, employees, and visitors. The Project's security will include, but not be limited to, the following design features:

a) Installing and utilizing a 24-hour/seven-day security program to ensure the safety of its residents and site visitors.

b) Full-time security personnel. Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings, including parking; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with CCPD, as necessary.

c) Staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services.

d) Controlled access to all residential units, lobby areas, and residential common open space areas through the use of key cards, site security and/or other means, as appropriate.

e) CCTV surveillance within the parking garage, ground floor levels, and open space areas.

f) Lighting of entry-ways, publicly accessible areas, parking areas, and common building and open space residential areas.

Transportation

PDF-TRAF-1 (Construction Management Plan): A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Traffic Engineer, Civil Engineer, and Current Planning Manager, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by City's Fire and Police Departments. The City Building Official, City Engineer, City Traffic Engineer and Current Planning Manager, as applicable, would reserve the right to reject any engineer at any time and to require that the FCMP be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:

- Construction schedule and hours.
- Framework for construction phases.
- Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
- Potential location of construction parking and office trailers.
- Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). Use of Janisann Avenue to the west of the Project Site by haul trucks, material deliveries or construction worker vehicles shall be specifically prohibited.
- Emergency access plan.
- Demolition plan.
- Staging plan for the concrete pours, material loading and removal.
- Crane location(s).
- Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
- Community notification procedures.

- The FCMP shall at a minimum include the following:
    1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.
    2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
    3. Construction plans and procedures to address community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.
    4. Procedures for the training and certification of flag persons.
    5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas.
    6. The location of temporary power, portable toilet and trash and materials storage locations.
    7. The timing and duration of any street and/or lane closures shall be approved in advance by the City and made available in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP shall require that review and approval of any proposed lane closures include coordination with the Fire and Police Departments to minimize potential effects on traffic flow and emergency response.
    8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.

2.2.5 Requested Permits and Approvals

The discretionary approvals required to implement the Modified Project are similar the Approved Project, noting that the request for approval of a minor modification to the Comprehensive Plan would include a reduction in high-intensity commercial floor area in favor of residential units and affordable housing. The Modified Project's requested approvals include, but are not necessarily limited to, the following:

- Minor Modification to the Comprehensive Plan for the Project, which would establish the development standards for the Project Site consistent with the Modified Project;
- Construction Permits, including building, grading, excavation, foundation, and associated permits;
- Haul Route Permit, as may be required by Culver City; and
- Other discretionary and ministerial approvals as needed and as may be required.

2.2.6 Responsible Public Agencies

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). Responsible agencies that have been identified for the Project may include the Los Angeles Regional Water Quality Control Board, South Coast Air Quality Management District, and other agencies as needed.

3.0 Environmental Impact Analysis

This section provides an impact assessment of the currently proposed 11111 Jefferson Project (Modified Project). The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously adopted EIR for 11111 Jefferson Boulevard Mixed-Use Project (Approved Project) and the most current Appendix G of the CEQA Guidelines. The conclusions of the previously adopted EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

This Addendum focuses on changes from the Approved Project to the Modified Project that would potentially affect the following impact areas, which were evaluated in the Draft EIR: air quality, cultural resources (historical resources and archeological resources), energy, geology and soils (paleontological resources), greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services (fire protection and police protection), transportation, and tribal cultural resources.

The Approved Project's Initial Study included in Appendix A-2 of the Draft EIR found that the Approved Project's impacts related to aesthetics, agriculture and forestry resources, air quality (odors), biological resources, cultural resources (human remains), geology and soils (all subtopics except for paleontological resources), hazards and hazardous materials (routine transport, proximity to airports/airstrips, emergency response, and wildfires), hydrology and water quality, land use and planning (physical division of an established community); mineral resources, noise (airport noise), population and housing (displacement), public services (schools, parks, and other public facilities), recreation, utilities and service systems, and wildfire would be less than significant or have no impact.

Aesthetics. With regard to aesthetics impacts, the Project Site is not located in a scenic resource area or area with protected views or vistas designated by the City. As with the Approved Project, the Modified Project would be consistent with the Open Space Element, Culver City Municipal Code (CCMC) regarding landscaping regulations and standards, the Urban Tree Requirements, and lighting standards. Furthermore, the Project Site is located in a highly urbanized area of the City and the Project Site have low aesthetic value. The Culver City General Plan (General Plan) and CCMC include goals, objectives, and policies, that govern scenic quality. The Modified Project would be consistent with the applicable goals, objectives and policies of the former General Plan for the same reasons as evaluated in the Certified EIR given the Approved Project and the Modified Project both propose new development of relatively similar size and scale on a redevelopment site within an urbanized area of the City.

Also, with regards to aesthetic resources, the Modified Project would be consistent with the applicable policies in Culver City General Plan 2045, including those within the Land Use and Community Design Element. Policy LU-14.2: Create an attractive pedestrian environment, seeks to facilitate a diverse and attractive pedestrian environment through the provision of street furniture, lighting, and other amenities. Consistent with this policy, the Project would incorporate public-facing ground floor landscaping and community parks along the its street frontages. Accent lighting and buildings entrances along the street frontage would help activate the pedestrian environment. Consistent with Policy LU-14.8, Improved street tree canopy, the Modified Project would incorporate trees along its street frontages in accordance with City

requirements to improve the overall streetscape.[3] Policy LU-15.1: Walkable and inviting buildings and spaces, requires building design that creates walkable and inviting spaces, such as locating parking behind buildings, allowing for outdoor plazas and dining, and locating building frontages in close proximity to the sidewalk edge, where appropriate. The Project would include ground floor residential units along the public street frontages. Parking would be located interior to the buildings out of view from the public. Additionally, vehicular ingress/egress is limited to two driveways on Machado Road and Sepulveda Boulevard, thereby emphasizing the pedestrian environment and activating the streetscape near the Project Site.

Also, Policy LU-15.3: Architectural and visual interest in new development, encourages distinctive architecture and elements that add visual interest to buildings to enhance people's perceptions of Culver City as an interesting and inviting place. The Modified Project would change the character and quality of the former commercial buildings and parking lot site (or now vacant site) with a new, contemporary, high-quality architecturally designed building. The design concept includes a blend of colors and materials on the various building components with a unified design scheme. The use of warm and cool colors, as well as upper level setbacks would help break up the building massing. In addition, as with the Approved Project, the Modified Project would comply with applicable provisions of the current Culver CCMC pertaining to height, setbacks, screening of utilities that are relevant to scenic quality. Thus, as with the Approved Project, the Modified Project would be consistent with applicable goals, objectives, and policies of the General Plan governing scenic quality and impacts would be less than significant.

Additionally, as with the Approved Project, the Modified Project would include low to moderate levels of interior and exterior lighting and be constructed with non-reflective materials that would not result in light or glare. Since the Approved Project and the Modified Project are similar in scale and height, the Modified Project would not impact shadow-sensitive uses. Therefore, the aesthetics impacts under the Modified Project would be similar to the Approved Project.

Agriculture and Forestry Resources. With regard to agriculture and forestry resources impacts, the Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or timberland. As with the Approved Project, the Modified Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, conflict with existing zoning for agricultural use or a Willamson Act contract, cause rezoning of forest land or timberland, result in loss of forest land or conversion of forest land to non-forest use, or conversion of farmland to other uses. Therefore, the agricultural and forestry resources impacts under the Modified Project would be similar to the Approved Project.

Air Quality (Odors). With regard to air quality (odors) impacts, the Initial Study prepared for the Approved Project concluded that through adherence with mandatory compliance with the Southern California Air Quality Management District (SCAQMD) Rules and State measures, project construction activities and materials would not result in other emissions that create objectionable odors. As with the Approved Project, the Modified Project would be of similar scale and would not be expected to generate

[3] City of Culver City, 2024a. Culver City General Plan 2045, Land Use and Community Design Element. Available online at: culvercity.org/files/content/public/v/14/services/building-development/general-plan/land-use-and-community-design.pdf, accessed January 2025.

emissions leading to nuisance odors that would adversely affect nearby sensitive receptors. Therefore, air quality impacts regarding odors under the Modified Project would be similar to the Approved Project.

Biological Resources. With regard to biological resources impacts, the Project Site is located in a highly urbanized area of the City and is not suitable for candidate, sensitive, or special status species. Additionally, no designated riparian habitat or natural communities exists on the Project Site or in the surrounding area since the Project Site is currently undeveloped and vacant and supports street trees on the property perimeter. No wildlife corridors or natural wildlife nursery sites are present on the Project Site or in the surrounding area and the potential for native resident or migratory wildlife species movement through the Project Site is negligible. As with the Approved Project, the Modified Project would comply with the applicable provisions pertaining to the removal and replacement of street trees of the CCMC and the development would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, of State Habitat Conservation Plan. Therefore, the biological resources impacts under the Modified Project would be similar to the Approved Project.

Cultural Resources (Human Remains). With regard to cultural resources (human remains) impacts, the structures located on the Project Site at the time of the Certified EIR were demolished as part of the Approved Project. The Project Site is currently undeveloped and vacant but has been previously disturbed. As with the Approved Project, the Modified Project would require excavation that could extent into native soils, however, the Modified Project does not propose a subterranean parking level and proposed excavation depth would be less than the Approved Project. The Modified Project would also comply with regulatory provisions including the State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines 15064.5(e). Therefore, cultural resources impacts regarding human remains under the Modified Project would be less than significant similar to the Approved Project.

Geology and Soils. With regard to geology and soils impacts, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the Project Site is the Newport Inglewood Fault Zone is located approximately 1.5 miles east of the Project Site.[4] In addition, the nearest fault is the Overland Avenue Fault, located approximately 2,000 ft east of the Project Site, but no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault. Thus, the potential for surface rupture due to faulting occurring on the Project Site is considered low. As with the Approved Project, the Modified Project would be constructed to meet or exceed the Culver City Building Code and the most recent California Building Code (CBC) to accommodate maximum ground accelerations expected from known faults. With implementation of site-specific structural and seismic design parameters and recommendations for foundations, impacts to ground shaking are considered low. Additionally, the Project Site is located outside the areas identified as susceptible to earthquake-induced landslides and less than significant impacts would occur.

During construction, as with the Approved Project, the Modified Project would be required to comply with the California Building Code and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, as with the Approved Project, the Modified Project would prepare a Stormwater Pollution Prevention Plan (SWPPP) that incorporates Best

[4] California Department of Conservation, Fault Activity Map of California, 2010.

Management Practices (BMPs) to control water erosion during construction activities. As concluded in the Preliminary Geotechnical Report prepared for the Approved Project, there are no major open faces close to the Project Site and as mentioned above, as with the Approved Project, the Modified Project would be required to comply with the most recent CBC for a safe development design and implementation of the site-specific design measures including foundation design recommendations of the final design-level geotechnical report that would further ensure ground and soil stability hazards. As it pertains to expansive soils, as with the Approved Project, the Modified Project would remove and replace the high-plasticity clay with non-expansive soil beneath the foundations before construction begins. Lastly, the Project Site is located in an urbanized area where municipal wastewater infrastructure already exists and neither the Approved Project nor the Modified Project propose the installation of septic tanks or alternative waste water disposal systems. Therefore, geology and soils impacts (except for paleontological resources) under the Modified Project would be less than significant and similar to the Approved Project.

Hazards and Hazardous Materials. With regard to hazards and hazardous materials impacts relating the Project's potential create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, as with the Approved Project, the Modified Project may use hazardous materials during construction and operational activities. However, these materials would be used in accordance with manufacturer standards and regulatory requirements and at concentrations that would not pose significant threats to the public or the environment. Additionally, the Project Site is not located within an airport land use plan or within two miles of a public or private airport and thus the Project would not result in airport-related safety hazard or excessive noise for people residing or working in the Project area. The Project Site is not located on an established disaster route. As with the Approved Project, the Modified Project may require temporary lane closures during certain periods of the day; however, it is assumed that the majority of construction activities would be confined on-site. As with the Approved Project, the Modified Project would implement traffic control measures to maintain flow and access during lane closures and implement a Construction Traffic Management Plan. Lastly, the Project Site is also not located in an area of moderate or very high fire hazard and is not in proximity to wildlands or high fire hazard areas and thus no impacts to wildland fires would occur. Therefore, impacts related to the routine transport of hazardous materials, proximity to airports/airstrips, emergency response, and wildfires under the Modified Project would be less than significant, similar to the Approved Project.

Hydrology and Water Quality. The Modified Project would require less volume of excavation for the residential building than the Approved Project and would have a similar building footprint as the Approved Project. The Modified Project, as with the Approved Project, could contribute to pollutant loading in stormwater runoff from the construction site. The Modified Project, as with the Approved Project, would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. With regard to long-term water quality and hydrology impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, the Approved Project and the Modified Project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. Similar to the Approved Project, the Modified Project would not increase runoff compared to existing conditions such that off-site erosion, siltation, flooding, or pollution occurs following redevelopment of the Project Site. As with the Approved Project, impacts related to hydrology

and water quality under the Modified Project would be less than significant and would be similar to the Approved Project. Other impacts under the Modified Project related to groundwater recharge and conflicts with water quality control plans or sustainable groundwater management plans would also be less than significant and similar to the Approved Project.

Land Use and Planning. With regard to land use and planning impacts, as with the Approved Project, the Modified Project would not divide an established community because the Project Site is located in a highly urbanized area of the City and the Modified Project would represent redevelopment and infill development of an already established community as with the Approved Project. As with the Approved Project, the Modified Project would not close any public streets or otherwise notably alter established infrastructure in the area causing division of an established community. Therefore, land use and planning impacts regarding the physical division of an established community under the Modified Project would be less than significant, similar to the Approved Project.

Mineral Resources. With regard to mineral resources impacts, the Project Site is not designated as a mineral resource zone in the City. Although the Inglewood Oil Field (Oil Field) is located approximately 0.90 miles northeast from the Project Site, no mineral resource extraction or related operations currently exists on-site. Since the Project Site is located in a highly urbanized area of the City and has been previously disturbed, the potential of uncovering mineral resources during construction activities is considered low. Therefore, mineral resource impacts under the Modified Project would be less than significant, similar to the Approved Project.

Population and Housing. With regard to population and housing impacts, as with the Approved Project, the Modified Project would not displace existing people or housing as the Project Site is currently undeveloped and vacant. Therefore, population and housing impacts regarding displacement under the Modified Project would not occur, similar to the Approved Project.

Public Services - Schools. With regard to impacts to schools, the Modified Project would generate 114 more dwelling units than the Approved Project. Pursuant to Section 65995 of the California Government Code, payment of the school fees established by the Culver City School District (CCSD) in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. As such, impacts to school facilities and services under the Modified Project would, as with the Approved Project, would be less than significant. Neither the Approved Project nor the Modified Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Approved Project and the Modified Project.

Public Services – Parks and Libraries. With regard to public services library and park/recreation impacts, as with the Approved Project, the Modified Project would introduce additional housing that would generate an increased population requiring additional library and park/recreation services within the City. As with the Approved Project, the Project Applicant under the Modified Project would be required to pay development fees pursuant to Section 65995 of the California Government Code (school impact fees), meet the parkland dedication or fee requirements, as applicable, pursuant to Culver City's standard conditions of

approval and pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC, as applicable, and pay the required fees per the Developer Fee Program for the Los Angeles County Public Library (LACPL) as provided in the Los Angeles County, Code of Ordinances, Title 22: Planning and Zoning, Division 2: Additional Regulations, Chapter 22.72: Library Facilities Mitigation Fee. The payment of these applicable fees mitigate impacts to parks/recreation and library facilities. It is also noted that the Modified Project would include two community parks, a 4,630 sf park on the corner Sepulveda Blvd. and Machado Road, and a 12,890 sf park on Sepulveda Blvd, in addition to common open space and amenity spaces to further offset the demand for off-site park and recreation facilities. Therefore, public services library and park/recreation impacts would be less than significant, similar to the Approved Project.

Utilities and Service Systems. With regard to utilities and service systems impacts, as with the Approved Project, the Modified Project would be served by existing utilities and service systems including water services provided by the Golden State Water Company (GSWC), wastewater treatment services from the Hyperion Water Reclamation Plant (HWRP), electric power and natural gas provided by Southern California Edison (SCE) and Southern California Gas Company (SoCalGas), and telecommunication lines including internet, telephone, and other services. As analyzed in the Approved Project's Initial Study, the Approved Project would generate 56,316 gallons per day (gpd) of wastewater or water demand. Utilizing the same residential (156 gal/unit) and commercial (150 gal/1,000 sf) wastewater generation as the Approved Project, the Modified Project's 344 units would generate 53,664 gpd of wastewater or water demand and the 2,000 sf of commercial use would generate 300 gpd, for a total of 53,964 gpd of wastewater or water demand. As analyzed in the Approved Project's Initial Study, the Approved Project would generate 1.161 tons of solid waste per day or 517 tons per year. Utilizing the same solid waste generation factor as the Approved Project, the Project's 344 units would generate 0.688 tons per day or 251 tons per year (based on 4 lbs/unit/day) and the commercial uses would generate 0.025 tons per day or 9 tons per year (based on 2.5 lbs/100 sf/day) for a total of 260 tons per year. Thus, water, wastewater and solid generation would all be reduced under the Modified Project compared to the Approved Project. Furthermore, it can be expected that electric and natural would not be substantially different under the Approved Project and the Modified Project. Accordingly, as the Approved Project was found to result in less than significant utility impacts, the Modified Project would also result in less than significant impacts, as implementation of the both development scenarios are not expected to materially reduce the local infrastructure's capacity. No substantial new or expanded utility facilities would be required beyond connections to local infrastructure. Overall, utilities and service systems impacts under the Modified Project would be similar to the Approved Project.

Wildfire. With regard to wildfire impacts, the Project Site is not located within or near a Very High Fire Hazard Severity Zone (VHRHSZ) or within or near a State Responsibility Area. As with the Approved Project, the Modified Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risks. Therefore, no wildfire impacts would occur under the Approved Project or the Modified Project.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions

set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered.

The checklist and evaluation below provides the following information for each of these environmental impact categories: The checklist and evaluation below provides the following information for each of these environmental impact categories:

1 IMPACT DETERMINATION IN THE CERTIFIED EIR

This section lists the impact determination made in the Certified EIR for each impact category.

2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D) , this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

(A) The project will have one or more significant effects not discussed in the prior environmental documents;

(B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative;

then the question would be answered "Yes," requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered "No" and no Supplemental or Subsequent EIR is required. New studies completed as part of this environmental review are attached to this Addendum, or are on file with the Planning Department.

5 MITIGATION MEASURES ADDRESSING IMPACTS

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides project design features (PDFs) or mitigation measures to address effects in the related impact category. If so, a "Yes" response will be provided. In some cases, the previously adopted PDFs or mitigation measures have already been implemented or are not applicable to the Modified Project, or a significant impact was not identified, and mitigation was not required. In either instance, a "No" response will be indicated. References to the "Project" within the mitigation measures listed below shall also apply to the Modified Project.

6 CONCLUSION

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 Air Quality

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant	No	No	No	Yes
(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	No	No	No	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant	No	No	No	Yes

3.1.1 Impact Determination in the Certified EIR

With regards to air quality Thresholds (a)-(c), the Certified EIR concluded that impacts regarding conflicts with an applicable air quality management plan, increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and expose sensitive receptors to substantial pollutant concentrations would be potentially significant for the Approved

Project. Implementation of Mitigation Measures AIR-1 and AIR-2 would reduce construction related impacts to a less than significant level.

3.1.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a).

Construction

The overall maximum daily use and extent of construction equipment to be utilized under the Modified Project and the Approved Project would be similar. However, it acknowledged that the Modified Project would not require excavation for subterranean parking, nor involve demolition activities since the former on-site buildings have already been removed from the site. Nonetheless, similar to the Approved Project, the Modified Project's daily construction emissions could exceed Southern California Air Quality Management District (SCAQMD) daily localized construction emissions thresholds prior to mitigation for Nitrogen oxides (NO_x), Particulate matter 10 (PM10), and PM2.5 and thus, construction activities could increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants emissions and impacts are considered potentially significant without mitigation. Thus, as with the Approved Project, the Modified Project would implement Mitigation Measure AIR-1 to minimize and reduce construction-related emission to below applicable SCAWQMD thresholds. Furthermore, as with the Approved Project, the Modified Project would comply with the SCAQMD Rule 403 requirements and the airborne toxic control measure (ATCM) to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. Compliance with these requirements would be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Additionally, as with the Approved Project, the Modified Project would generate short-term construction jobs, but it would not necessarily add new employees, since construction workers typically travel amongst construction sites within the region and are not typically brought from other areas to work on developments such as the Modified Project. Similar to the Approved Project, under the Modified Project, construction jobs would not conflict with the long-term employment projections upon which the Air Quality Management Plan (AQMP) are based.

Overall, based on the above, with implementation Mitigation Measure AIR-1, the Modified Project as with the Approved Project, would not conflict with or obstruct the implementation of an air quality plan such that a significant air quality impact would occur. Impacts would be less than significant with mitigation, similar to the Approved Project.

Operation

As discussed under Section 3.11, Transportation, the Modified Project would result in less traffic generation than the Approved Project. As such, the largest contributor to operational emissions, mobile source emissions, and correspondingly operational emissions, would be reduced under the Modified Project. As with the Approved Project, the Modified Project would concentrate uses in an area well served by alternative transit facilities (local bus lines) would not conflict with the Southern California Associated of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy policies for the concentration of growth in proximity to transit. Furthermore, as discussed in Section 3.9, Population and

Housing, as with the Approved Project, the Modified Project's increase in population would be within with SCAG's growth projections as part of their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Further, the Modified Project would also help the City meet the City's share of the State mandated Regional Housing Needs Assessment (RHNA). As such, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for Culver City. The Project would not increase or induce residential density growth not otherwise anticipated. As with the Approved Project, Modified Project operations would not increase the frequency or severity of an existing air quality violation for pollutant emissions and would not conflict with or obstruct implementation of relevant air quality policies in the adopted AQMP. Therefore, operational impacts would be less than significant, similar to the Approved Project.

Threshold (b).

Construction

As with the Approved Project, construction of the Modified Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the Project Site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria and thresholds set forth by the SCAQMD, the Certified EIR included a quantitative analysis of worse-case daily regional construction emissions for the Approved Project. The analysis showed that the maximum daily regional construction emissions would be above the SCAQMD significance threshold for NO_x. Therefore, impacts related to regional construction emissions for the Approved Project were identified as potentially significant. Mitigation Measure AIR-1 was prescribed to reduce this impact to a less than significant level.

The overall maximum daily use and extent of construction equipment to be utilized under the Modified Project and the Approved Project would be similar. Thus, maximum daily emissions under Modified Project would be similar to the Approved Project because emission levels are based on a single day in which maximum construction activity would occur. Accordingly, similar to the Approved Project, with implementation of Mitigation Measure AIR-1, maximum daily construction regional emissions under the Modified Project would not exceed SCAQMD numerical regional construction emissions significance thresholds. Furthermore, with a reduction of one-level of subterranean parking and associated excavation/construction activities compared to the Approved Project, the overall extent of regional construction emissions during construction would be expected to be less under the Modified Project compared to the Approved Project.

In addition, construction contractors are required to comply with the applicable provision of SCAQMD Rule 403 for controlling fugitive dust emissions. Applicable fugitive dust control measures are incorporated into the construction emissions modeling within the SCAQMD-approved CalEEMod software and include the application of water (or non-toxic soil stabilizer) to disturbed areas and unpaved road surfaces and limiting vehicle speeds to 15 miles per hour on unpaved surfaces.

Based on the above, impacts related to regional construction emissions would be less than significant and similar to the Approved Project. Furthermore, the Modified Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, similar to the Approved Project.

Operation

Regional air pollutant emissions associated with operational activities would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. However, as with the Approved Project, the Modified Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building Program (as required by the City's standard conditions of approval). As with the Approved Project, the Modified Project would incorporate "green building measures" as part of its design to reduce Project-related criteria pollutant emissions including HVAC systems, installation of low-flow water fixtures, and solar PV power systems equivalent to at least one percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 SF of new development.

Based on criteria and thresholds set forth by the SCAQMD, the Certified EIR included a quantitative analysis of worse-case daily regional operational emissions for the Approved Project. The analysis showed that the maximum daily regional operational emissions would be below SCAQMD significance thresholds. The Certified EIR concluded that the Approved Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable. Impacts for the Approved Project would be less than significant.

As discussed under Section 3.17, *Transportation*, the trip generation and vehicles miles travelled under the Modified Project would be less than the Approved Project. Thus, mobile-source source emissions would be reduced under the Modified Project. Furthermore, given the Modified Project would implement the similar project design features and have an otherwise similar scale of development as compared to the Approved Project, the maximum daily regional operational emissions under the Modified Project would also be below SCAQMD significance thresholds, similar to the Approved Project.

Based on the above, impacts related to regional operational emissions would be less than significant, similar to the Approved Project. Furthermore, the Modified Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, similar to the Approved Project.

Threshold (c). Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. The nearest off-site air quality sensitive receptors are residential uses within the Heritage Park Neighborhood, just to the north of Project Site.

Localized-Construction

As analyzed in the Certified EIR, based on criteria and thresholds set forth by the SCAQMD, the Certified EIR included a quantitative analysis of worse-case daily localized construction emissions for the Approved Project. The analysis showed that the maximum daily localized construction emissions would be above SCAQMD significance thresholds for NO_x, PM10, and PM2.5,. Therefore, impacts related to localized construction emissions for the Approved Project would be potentially significant prior to mitigation. Mitigation Measure AIR-1 was prescribed to reduce this impact to a less than significant level.

The overall maximum daily use and extent of construction equipment to be utilized under the Modified Project and the Approved Project would be similar. Thus, maximum daily emissions under Modified Project would be similar to the Approved Project because emission levels are based on a single day in which maximum construction activity would occur. Accordingly, similar to the Approved Project, with implementation of Mitigation Measure AIR-1, maximum daily construction localized emissions under the Modified Project would not exceed SCAQMD numerical localized construction emissions significance thresholds. Furthermore, with removal of subterranean parking and associated excavation/construction activities compared to the Approved Project, the overall extent of localized construction emissions during construction would be expected to be less under the Modified Project compared to the Approved Project. Overall, impacts related to localized construction emissions on sensitive receptors under the Modified Project would be less than significant, similar to the Approved Project.

Localized-Operation

As with the Approved Project, the Modified Project would be designed to incorporate sustainability features. As with the Approved Project, the Modified Project would also be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building Program (as required by the City's standard conditions of approval). As with the Approved Project, the Modified Project would incorporate "green building measures" as part of its design to reduce Project-related criteria pollutant emissions including HVAC systems, installation of low-flow water fixtures, and solar PV power systems equivalent to at least one percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 SF of new development.

Based on criteria and thresholds set forth by the SCAQMD, the Certified EIR included a quantitative analysis of worse-case daily localized operational emissions for the Approved Project. The analysis showed that the maximum daily localized operational emissions would be below SCAQMD significance thresholds. Given the Modified Project would implement the same project design features, reduce the number of vehicle trips, and have an otherwise similar scale of development as compared to the Approved Project, the maximum daily localized operational emissions under the Modified Project would also be below SCAQMD significance thresholds, similar to the Approved Project. Thus, impacts related to localized operational emissions would be less than significant, similar to the Approved Project.

Carbon Monoxide Hotspots

As with the Approved Project, the Modified Project would not cause or contribute to the formation of carbon monoxide (CO) hotspots and CO concentrations at Project impacted intersections would remain well below the ambient air quality standards. As analyzed in the Certified EIR, no exceedances of CO have been recorded at monitoring stations in the Air Basin and the Air Basin is currently designated as a CO

attainment area for both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). As such, it is not expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

As analyzed in the Certified EIR, based on the Approved Project's Traffic Study, under future operational year plus Project conditions, the intersection of Culver Boulevard and Sepulveda Boulevard had the highest peak traffic volume with approximately 671,180 per day.[5] As a result, CO concentrations are expected to be less than those estimated in the 2003 AQMP, which would not exceed the thresholds. Thus, this comparison demonstrates that the Approved Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Approved Project would result in less than significant impacts with respect to CO hotspots.

Since the Modified Project would generate less traffic than the Approved Project, the Modified Project would also not include traffic levels substantially contributing to the creation CO hotspots. Therefore, impacts related to the contribution or formation of CO hotspots under the Modified Project would be less than significant and similar to the Approved Project.

Toxic Air Contaminants – Construction

The greatest potential for toxic air contaminants (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Incidental amounts of toxic substances such as oils, solvents, and paints would be used. As analyzed in the Certified EIR, the Approved Project exceeded the cancer risk thresholds for the nearest sensitive receptor (residential uses to the north). Thus, Mitigation Measures AIR-1 and AIR-2 were prescribed to lower the cancer risk to an acceptable level. The Approved Project's short-term emissions with mitigation would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Approved Project construction. Therefore, the Approved Project would result in a less than significant impact related to construction TAC emissions.

As discussed above, the overall extent of Modified Project's construction-related emission would be less than the Approved Project with removal of subterranean parking and associated excavation/construction activities compared to the Approved Project. Therefore, while the cancer risk prior to mitigation would be much lower under the Modified Project, as with the Approved Project, the Modified Project would implement Mitigation Measures AIR-1 and AIR-2 to minimize TAC emissions to the extent feasible. As such, TAC impacts would be less than significant and similar to the Approved Project.

Toxic Air Contaminants – Operation

SCAQMD recommends that health risk assessments be conducted for substantial sources of DPM emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. The Certified EIR indicated that the Approved Project is not anticipated to generate a substantial number of daily truck trips, which would also be the case the Modified Project. Furthermore, typical sources of hazardous TACs include industrial manufacturing processes and automotive repair facilities. As with the Approved Project, the Modified Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays).

[5] Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.

Based on this, the Modified Project is not expected to release substantial amounts of TACs and impacts would be less than significant, similar to the Approved Project.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[6] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As with the Approved Project, the Modified Project's emissions would not exceed SCAQMD's regional or localized significance thresholds with implementation of mitigation, where applicable. Therefore, the Modified Project's contribution to cumulative air quality impacts would be less than significant, similar to the Approved Project.

3.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. Thus, emissions from demolition activities under the Approved Project would not occur under the Modified Project. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. The current circumstances on the Project Site and in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.1.4 Any New Information Requiring New Analysis or Verification?

Although it is not considered "new information" for CEQA purposes, with regard to consistency with applicable air quality plans, the 2022 AQMP has been adopted by the SCAQMD. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act (CAA) measures to achieve the 2015 8-hour ozone standard. Additionally, since the time the analysis was conducted for the certified EIR, SCAG's 2024-2050 RTP/SCS was adopted, which is an update to the previous 2020-2045 RTP/SCS. However, the 2022 AQMP is based on the projections contained in the 2020-2045 RTP/SCS. Both the RTP/SCS and the AQMP are based, in part, on growth projections originating with county and city general plans.

Based on the air quality analysis of the Modified Project (see section Threshold (b) above), the Modified Project's short-term construction impacts would not result in significant impacts with mitigation based on the SCAQMD regional and local thresholds of significance. The Modified Project would also not result in

[6] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.

significant long-term operation impacts based on the SCAQMD regional thresholds of significance. Similar to the Approved Project, the Modified Project would be generally consistent with the AQMP in its incorporation of applicable control strategies for emissions reduction during construction and operation of the Modified Project. Therefore, the Modified Project would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2022 AQMP. Additionally, the population increases as a result of the Modified Project would represent a small fraction of and would be well within the 2045 growth projections of the 2020-2045 RTP/SCS. Further, the Modified Project's redevelopment of the Project Site would continue an infill growth pattern near transit facilities that is encouraged locally in the City's plans and regionally by SCAG policies; thus, reducing VMTs associated with travel by single-occupancy vehicles. Therefore, the Modified Project would not conflict with SCAG's RTP/SCS goals and emission projections in the 2022 AQMP.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to air quality that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.1.5 Certified EIR's Mitigation Measures Addressing Impact

The following mitigation measures set forth in the Certified EIR to address air quality impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant air quality impacts would result from implementation of the Modified Project.

AIR-1: Construction of the Project shall incorporate the following conditions:

a. The Project shall use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater and not identified under b or c. below. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

b. During the site preparation and excavation/grading phases, watering must be conducted a minimum of 4 times per day. Alternatively, other fugitive dust emissions practices shall be implemented that will reduce fugitive dust to at least the same level.

c. On-road haul trucks, including delivery and those conveying excavated material, shall not exceed 120 truck trips (round trips, or 240 one-way trips) per day.

AIR-2: At a minimum, the following equipment shall be electric or non-diesel fueled: concrete/industrial saws, cranes, forklifts, plate compactors, pumps, welders, and cement and mortar mixers. Additionally, onsite electricity shall be used to power the equipment to the greatest

extent possible. Where grid electricity cannot be used, a non-diesel powered generator shall be used and use of the generator shall be limited to only those activities necessary.

3.1.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2 Cultural Resources

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	No Impact	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact	No	No	No	Yes

3.2.1 Impact Determination in the certified EIR

The Certified EIR concluded that no impacts under Threshold (a) regarding historic resources would occur under the Approved Project. Impacts regarding archaeological resources under Threshold (b) would be less than significant with implementation of Mitigation Measures ARCH-1 to ARCH-4.

3.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a). The Approved Project and the Modified Project would be located within the same Project Site. The Certified EIR found that no historical resources were identified within the Project Site as the buildings located on the Project Site are considered non-eligible as historical resources and thus no direct impacts to historical resources under the Approved Project would occur. In addition, since the certification of the EIR, the buildings previously on-site were demolished as part of the Approved Project and the Project Site is currently undeveloped and vacant. As with the Approved Project, the Modified Project would result in no impacts to historical resources. Therefore, impacts to historical resources under the Modified Project would be similar to the Approved Project.

Threshold (b). As discussed in the Certified EIR, no cultural resources (including archeological resources) have been previously identified within the Project Site. However, the records search included in the Certified EIR concluded that the Project Site has the potential to contain buried archaeological resources. The Approved Project proposed excavations would reach a maximum depth of 25 feet below ground surface (bgs) for the subterranean parking and building foundations. Since the Modified Project would include no subterranean parking, the proposed excavation depth would be much less than the Approved Project.

Nonetheless, based on the potential for archeological resources to have been preserved underneath the prior on-site development, there is still a possibility to encounter intact prehistoric or Native American archeological resources during ground disturbance activities on the Project Site. Thus, impacts would be potentially significant under the Modified Project and the Approved Project. Implementation of Mitigation Measures ARCH-1 through ARCH-4 would reduce impacts on archeological resources under both the Approved Project and the Modified Project to a less than significant level. Therefore, impacts to archaeological resources under the Modified Project would be similar to the Approved Project.

Cumulative Impacts

As with the Approved Project, the Modified Project would not result in impacts to a historical resource. Thus, the Approved Project and the Modified Project would not have the potential to contribute toward significant cumulative impacts related to historical resources. Impacts related to archaeological resources would be potentially significant due to the potential presence of archeological resources on-site. Archaeological resources impacts are site-specific and are assessed on a site-by-site basis. All development that involves ground-disturbing activities is required to implement standard City conditions of approval related to the discovery of archaeological resources, as well as existing state regulations and requirements, with mitigation prescribed on an as-needed basis. Therefore, cumulative impacts to cultural resources regarding historical and archaeological resources would be less than significant with mitigation, similar to the Approved Project.

3.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. However, none of the buildings were a historic resource. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. The current circumstances on the Project Site and in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.2.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to cultural resources that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.2.5 Certified EIR's Mitigation Measures Addressing Impact

The following mitigation measures set forth in the Certified EIR to address archeological resources impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant cultural resource impacts would result from implementation of the Modified Project.

ARCH-1: Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

ARCH-2: Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from a Gabrielino Tribe. The appropriate Native American tribal monitor shall be selected based on ongoing consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American monitor shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.

ARCH-3: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall

incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

ARCH-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

3.2.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.3 Energy

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
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?; or	Less Than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No	No	No	No

3.3.1 Impact Determination in the Certified EIR

With regards to energy Thresholds (a) and (b), the Certified EIR concluded that energy impacts would be less than significant under the Approved Project.

3.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a).

Construction

The Certified EIR found that construction of the Approved Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Impacts under the Approved Project would be less than significant. The overall daily use and extent of construction equipment to be utilized under the Modified Project and the Approved Project would be similar. However, with the removal of subterranean parking and associated excavation/construction activities compared to the Approved Project, the overall extent of construction activities and associated energy use would be expected to be less under the Modified Project compared to the Approved Project. As the Modified Project would include the use of similar equipment and implement similar construction methods as the Approved Project, it would similarly not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Impacts under the Modified Project would be less than significant, similar to the Approved Project.

Operation

As with the Approved Project, the Modified Project operations would consume energy in the form of electricity for lighting, and water conveyance, natural gas for heating, and fossil fuels during vehicle fuel usage. Operation of the Modified Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs; transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project; and diesel for the maintenance and testing of emergency generators.

The Certified EIR found that construction of the Approved Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Impacts under the Approved Project would be less than significant. As discussed under Section 3.11, *Transportation*, the trip generation and vehicles miles travelled under the Modified Project would be less than the Approved Project. Thus, transportation-related fuel would be reduced under the Modified Project. Furthermore, given the Modified Project would implement the same project design features and have an otherwise similar scale of development as compared to the Approved Project, the extent of operational energy usage under the Modified Project would also not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure, similar to the Approved Project.

Threshold (b). As with the Approved Project, the Modified Project would incorporate green building design features such as solar PV systems consistent with the energy efficiency standards in the City's Green Building Code and CALGreen Code. As with the Approved Project, the Modified Project would promote the use of bicycles as it is located close to bike paths and would comply with the CALGreen Code required number of bicycle parking spaces, which have the potential to reduce fuel consumption, as well as criteria pollutant and GHG emissions. In addition, the Project Site is also within a short distance of existing transit stops. As with the Approved Project, the Modified Project would be designed to meet criteria that meet or exceed the current Title 24 Energy standards. Lastly, as with the Approved Project, the Modified Project

would incorporate sustainable design features, which provide opportunities for improved energy efficiency that would exceed the regulatory standards. Based on the above, the Modified Project's features would support and promote the use of renewable energy and energy efficiency and would not conflict with or obstruct any applicable renewable energy or energy efficiency plan, which emphasize energy efficiency and the use of renewable energy. Thus, impacts would be less than significant. Therefore, impacts related to conflicts with or obstructing a state or local plan for renewable energy or energy efficiency under the Modified Project would be similar to the Approved Project.

Cumulative Impacts

As with the Approved Project, development of the Modified Project and related projects would increase the use of electricity, natural gas, and petroleum-based fuels. As discussed above, construction and operation of the Approved Project or Modified Project would not result in wasteful, inefficient, or unnecessary consumption of energy and would not increase the need for new energy infrastructure. Related projects would similarly not be anticipated to generate a substantial increase in the demand for electricity and natural gas. In addition, as with the Modified Project, related projects would be expected to incorporate applicable Title 24 standards and CalGreen requirements. Furthermore, as with the Modified Project, the related projects are also expected to benefit from statewide efforts toward increasing the fuel economy standards of vehicles. Therefore, although the Modified Project and related project development would result in the use of electricity and natural gas resources during construction and operation of the Modified Project, the use of electricity and natural gas would be on a relatively small scale and would be consistent with the SCE and SoCalGas service areas. With regard to transportation fuel, buildout of the Modified Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. However, the Modified Project would not conflict with the energy efficiency policies emphasized in SCAG's RTP/SCS. The Modified Project would support statewide efforts to improve transportation energy efficiency by locating high density residential uses at an infill location close to shopping centers and other destinations. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT as outlined the RTP/SCS for the region, which seeks improved access and mobility by emphasizing growth in areas with a mix of land uses and mobility options. Related projects would need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required, which would also ensure related projects contribute to transportation energy efficiency. Therefore, the Modified Project and related projects would incorporate land use characteristics consistent with state goals for reducing VMT, or incorporate mitigation measures, as needed. Overall, cumulative impacts related to electricity, transportation energy, and natural gas under the Modified Project would be less than significant and similar to the Approved Project.

3.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified.

The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.3.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to cultural resources that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.3.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.3.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.4 Geology and Soils

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(f) Directly or indirectly destroy a unique paleontological resource or site of unique geologic feature.	Potentially Significant Impact	No	No	No	Yes

3.4.1 Impact Determination in the Certified EIR

With regard to geology and soils, Threshold (f), the Certified EIR concluded that impacts to paleontological resources impacts would be potentially significant during construction for the Approved Project. Implementation of Mitigation Measures GEO-1 to GEO-4 would reduce paleontological resources impacts to a less-than-significant level.

3.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (f). The Approved Project and the Modified Project would be located within the same Project Site. The Project Site is underlain by younger Quaternary alluvium which contains a low-to-high

paleontological sensitivity with depth. The Approved Project proposed excavations would reach a maximum depth of 25 feet below ground surface (bgs) for the subterranean parking and building foundations. Since the Modified Project would include no subterranean parking, the proposed excavation depth would be much less than the Approved Project. Nonetheless, based on the potential for paleontological resources to occur in the underlying soils, there is still a possibility to encounter paleontological resources during ground disturbance activities on the Project Site. Thus, impacts would be potentially significant under the Modified Project and the Approved Project. Implementation of Mitigation Measures GEO-1 through GEO-4 would reduce impacts on paleontological resources under both the Approved Project and the Modified Project to a less than significant level. Therefore, impacts to paleontological resources under the Modified Project would be similar to the Approved Project.

Cumulative Impacts

Impacts related to paleontological resources would be potentially significant due to the potential presence of paleontological resources beneath the site. Paleontological resources impacts are site-specific and are assessed on a site-by-site basis. Related projects that involve substantial excavation with the potential to encounter buried or subsurface paleontological resources during construction, are expected to be subject to mitigation measures to mitigate impacts on paleontological resources through construction monitoring programs and treatment and curation requirements for discovered fossils. With implementation of such mitigation measures, cumulative impacts from related projects would be less than significant, similar to the Approved Project.

3.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. However, the current subsurface circumstances on the Project Site are still the same and would not necessitate any changes to the conclusions presented in the Certified EIR.

3.4.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to paleontological resources that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.4.5 Certified EIR's Mitigation Measures Addressing Impact

The following mitigation measures set forth in the Certified EIR to address paleontological resources impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant paleontological impacts would result from implementation of the Modified Project.

GEO-1: Prior to issuance of demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter older alluvial sediments. A qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (2010). The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older alluvial sediments. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments and are therefore likely to impact high sensitivity older alluvial sediments. Work in the upper 10 feet of the Project Site does not warrant monitoring. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.

GEO-2: Prior to commencement of demolition or excavation activities, the Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session shall be carried out by the Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.

GEO-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. The Paleontologist shall establish an appropriate buffer area around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

GEO-4: Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

3.4.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.5 Greenhouse Gas Emissions

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or	Less Than Significant	No	No	No	No
(b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No	No	No	No

3.5.1 Impact Determination in the Certified EIR

With regards to greenhouse gas (GHG) emissions, Thresholds (a) and (b), the Certified EIR concluded that impacts would be less than significant under the Approved Project.

3.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Thresholds (a)-(b). The Certified EIR found that construction of the Approved Project would not generate greenhouse gas emissions, either directly or indirectly, such that the Approved Project would have a significant impact on the environment. Impacts in this regard under the Approved Project would be less than significant. The overall daily use and extent of construction equipment to be utilized under the Modified Project and the Approved Project would be similar. However, with the removal of subterranean parking and associated excavation/construction activities compared to the Approved Project, the overall extent of construction activities and associated GHG emissions would be expected to be less under the Modified Project compared to the Approved Project. As the Modified Project would include the use of similar equipment and implement similar construction methods as the Approved Project, it would similarly not generate greenhouse gas emissions, either directly or indirectly, such that the Modified Project would have a significant impact on the environment. Impacts in this regard under the Modified Project would be less than significant, similar to the Approved Project.

Also, as discussed under Section 3.17, *Transportation*, the trip generation and VMT under the Modified Project would be less than the Approved Project. Thus, transportation-related GHG emissions would be reduced under the Modified Project. Furthermore, given the Modified Project would implement the same project design features and have an otherwise similar scale of development as compared to the Approved Project, the extent of operational GHG emissions under the Modified Project would also not generate greenhouse gas emissions, either directly or indirectly, that have a significant impact on the environment, similar to the Approved Project.

Given that the Modified Project remains a mixed-development in an urbanized area in proximity to multiple available public transit options, as with the Approved Project, the Modified Project would be consistent with the applicable plans, policies, and regulations to reduce GHG emissions as outlined in the Certified EIR for the Approved Project. That is, the Modified Project would be consistent with CARB's Scoping Plan, SCAG's RTP/SCS, Culver City Green Building Program Requirements (see Table B-10, *Project Consistency with Applicable Culver City Green Building Program Requirements*, of the Certified EIR), statewide GHG emission reduction strategies (see Table 4.5-4, *Project Consistency with Applicable Greenhouse Gas Reduction Strategies*, of the Certified EIR), and Executive Orders S-3-05 and B-30-15, for the reasons as evaluated for the Approved Project in the Certified EIR. Based on the analysis in Section 4.5, *Greenhouse Gas Emissions*, of the Certified EIR, similar to the Approved Project, the Modified Project would be consistent with, and would not conflict with applicable plans, policies, and regulations to reduce GHG emissions.

As the Modified Project would implement the same Project Design Features as the Approved Project, greenhouse gas emission impacts under the Modified Project would be less than significant and similar to the Approved Project.

Cumulative Impacts

The analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, as with the Approved Project, the Modified Project's analysis above considered the potential for the Modified Project to contribute to the cumulative impact of global climate change. Given the Modified Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Modified Project's incremental contribution to GHG emissions and its effect on global climate change would not be cumulatively considerable. For these reasons, the Modified Project's cumulative contribution to global climate change would be less than significant, and similar to the Approved Project.

3.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified.

The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.5.4 Any New Information Requiring New Analysis or Verification?

Although it is not considered "new information" for CEQA purposes, SCAG adopted the Connect SoCal 2024 (2024-2050 RTP/SCS) in April 2024, which is an update to the previous Connect SoCal 2020 (2020–2045 RTP/SCS); however, Connect SoCal 2024 has not yet been certified by CARB as being capable of achieving CARB's identified GHG reduction targets.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to greenhouse gas emissions that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure

3.5.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.5.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.6 Hazards and Hazardous Materials

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(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?	Less than Significant	No	No	No	No
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No	No	No	No
(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?	Less than Significant	No	No	No	No

3.6.1 Impact Determination in the Certified EIR

With regards to hazards and hazardous materials, Thresholds (b) through (d), the Certified EIR concluded that impacts would be less than significant under the Approved Project.

3.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (b). As analyzed in the Certified EIR, in consideration of the former on-site uses including agricultural uses and former gasoline station and former hydraulic lifts and underground storage tanks (USTs), the soils below the site contain low levels of volatile organic compounds (VOCs) reported in the soil vapor samples and cancer/health risks for future site occupants would be within acceptable regulatory standards, including residential receptors on the ground floor. Vapor intrusion would not represent an unacceptable risk to the future building occupants and vapor mitigation measures would not be needed for the Project Site based on the proposed redevelopment for the Approved Project. Therefore, as with the Approved Project, the Modified Project would not be subject to significant hazards associated with contaminated soils or soil vapors. Impacts would be less than significant under both the Approved Project and the Modified Project, with impacts being similar.

Also, the Certified EIR analyzed impacts from lead-based paint (LBP) and asbestos-containing materials (ACM) during the demolition and removal of the existing on-site buildings. These impacts were found to be less than significant with compliance to applicable regulatory requirements. However, the on-site buildings have been removed and as such, these potential impacts would not occur under the Modified Project.

Threshold (c). The Approved Project and the Modified Project are located within one-quarter mile of a school. ECF, which serves as a special education school, located at 5350 Machado Road, is directly adjacent to and north of the Project Site across Machado Road. Temple Akiba, which includes a childhood center, temple sanctuary, and classroom, is located 100 feet west of the Project Site across Sepulveda Boulevard. Additionally, El Rincon Elementary School, located at 11177 Overland Avenue, is located approximately 0.20 miles east of the Project Site. As with the Approved Project, the Modified Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all the materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturer's instructions. During operation, as with the Approved Project, the Modified Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the schools. Types of hazardous materials used during operation of the Modified Project would be in small quantities in the form of cleaning solvents, painting supplies, and pesticides for landscaping. As with the Approved Project, the Modified Project would comply with applicable standards and regulations pertaining to the maintenance or operation of small quantities of hazardous materials. As such, impacts would be less than significant. Therefore, impacts to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school under the Modified Project would be less than significant and similar to the Approved Project.

Threshold (d). The Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project Site was identified in the Hazardous Waste Information System (HAZNET), Facility Index System (FINDS), Recovered Government Archive Leaking Underground Storage Tank (RGA LUST), Los Angeles Co. Hazardous. Materials System (HMS), Aboveground Storage Tanks (AST), Statewide Environmental Evaluation and Planning System Underground Storage Tanks (SWEEPS UST), Hazardous Substance Storage Container Database Underground Storage Tanks (HIST UST), California Facility Inventory Database Underground Storage Tanks (CA FID UST), Enforcement and Compliance History Online (ECHO), Event Data Recorder (EDR) Hist Auto, Resource Conservation and Recovery Act – Small Quantity Generator (RCRA-SQG), Listing of leaking underground storage tank (LUST), Cortese, Historical "Cortese" Hazardous Waste & Substances Sites List (HIST CORTESE), California environmental reporting system (CERS), CERS HAZ WASTE, CERS TANKS, Hazardous waste tracking systems (HWTS), and RCRA Nongen/NLR environmental database reports. According to the listings above, the Project Site was occupied by a gasoline service station between 1969 and 1994. There were no violations for the various HAZNET listings for the disposal of waste oil and other organic solids off-site. In addition, according to the SWEEPS UST listings, one 5,000-gallon fuel UST, two 10,000-gallon fuel USTs, and one 1,000- gallon oil UST were located on the Project Site. As mentioned above, the existing USTs and ASTs were removed from the Project Site as part of the Approved Project and thus potential impacts under the Modified Project would not occur.

As discussed above under the analysis for Threshold (b), future building occupants would not be at risk from the former gasoline service station, hydraulic lift, and soil vapor. Therefore, neither the Approved Project nor the Modified Project would create a significant hazard to the public or the environment, and impacts would be less than significant. Therefore, impacts related to the site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that could create a significant hazard to the public or the environment would be less than significant under the Approved Project and the Modified Project, with impacts being similar.

Cumulative Impacts

With regard to cumulative impacts related to upset and accident conditions, emission of hazardous materials (including within one-quarter mile of a school), and listed hazardous materials sites, no as indicated previously, the Phase I ESA included a hazardous materials database search that identified 15 environmental hazardous materials listings within a 1/8-mile radius of the Project Site and 76 such listings within a one-mile radius. However, as concluded in the Phase I ESA, based on either distance, positions of the sites with respect to assumed groundwater flow direction, the native soils, and regulatory status, none of the sites identified in the environmental records search report are expected to affect soil or groundwater quality at the Project Site. Also as indicated previously, a field reconnaissance of the adjacent properties conducted for the Phase I ESA resulted in the conclusion that these properties do not contain RECs that adversely affect the Project Site. As indicated in the analysis of the hazardous and hazardous materials impacts of the Project above, the Project would not emit hazardous materials (e.g., TACs, ACMs, LBPs, PCBs, etc.) from the identified RECs on the Project Site (e.g. historical agricultural use, former gasoline service station and former UST, and on-site hydraulic lift) that would result in significant health effects to sensitive receptors in the Project vicinity, with compliance with applicable regulations (e.g., Cal-OSHA CFR Section 1910 and CCR Title 8, CUPA/Hazardous Materials Disclosure Reporting Program, SCAQMD Rule 1403, etc.). Therefore, cumulative impacts related to upset and accident conditions, emission of hazardous materials (including within one-quarter mile of a school), and listed hazardous materials sites would be less than significant.

All related projects would be subject to discretionary or ministerial review by the City, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, as with the Approved Project, the Modified Project would not result in any significant impacts related to hazards and hazardous materials. As with the Approved Project and the Modified Project, related projects would be subject to compliance with applicable regulatory requirements to avoid significant hazardous materials impacts to the public or the environment. Therefore, cumulative impacts would be less than significant under the Approved Project and the Modified Project, with impacts being similar.

3.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.6.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to hazard and hazardous materials that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.6.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.6.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.7 Land Use and Planning

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

3.7.1 Impact Determination in the certified EIR

With regards to land use and planning, Threshold (b), the certified EIR concluded that impacts would be less than significant under the Approved Project.

3.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (b). At the time of the Certified EIR, the Project Site had a General Plan Land Use designation of General Corridor Commercial and was zoned Commercial General (CG). The General Corridor Land Use designation and CG zone allowed small- to medium-scale commercial uses, emphasizing community-

serving retail, office, and service uses, which were consistent with the General Corridor Land Use designation. As discussed in the Certified EIR, the Approved Project is consistent with the applicable (former) General Plan designation and proposed a Zoning Map Amendment to Planned Development. The Approved Project contemplated redevelopment of the Project Site with an integrated, high-quality, mixed-use development. The Approved Project would provide a transition between the surrounding residential neighborhoods and the commercial uses. As such, the Approved Project would not conflict with the City's General Plan land use designation, and the physical impacts of the Project on the environment would be less than significant, as demonstrated in the Certified EIR. The Certified EIR concluded that approval of the requested discretionary actions, the Approved Project would not conflict with or impede implementation of applicable land use plans, policies, or regulations of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Approved Project's land use and planning impacts would be less than significant.

The Modified Project is also proposing a mix-use commercial and residential project that would also result in less than significant impacts, with mitigation as applicable, as demonstrated in this Addendum. The Modified Project would also be consistent with the site's current General Plan land use and zoning designation "Mixed Use Corridor 2" (MU-2). Thus, as with the Approved Project, the Modified Project would not result in conflicts with the applicable General Plan or Zoning Code or any other applicable land use plan, policy, or regulation such that significant physical impacts on the environment would occur. Impacts for the Modified Project would be less than significant and similar to the Approved Project.

Cumulative Impacts

As with the Approved Project, the Modified Project would not result in any conflicts with any of the applicable plans, policies, or regulations associated with development of the Project Site that would cause a significant physical impact on the environment. Related projects are subject to CEQA review and review by City regulatory agencies. Most notably, related projects seeking increases in permitted densities or height are subject to review by the Culver City Planning Division Commission and other City departments and divisions for consistency with plan provisions and other City requirements. The related projects represent infill development and as such are consistent with local and regional policies to concentrate development near public transit and encourage alternative transportation. Based on this and based on the determination that the Modified Project would be consistent with the adopted land use plans and zoning, cumulative impacts regarding consistency with the land use regulatory framework would be less than significant and similar to the Approved Project.

3.7.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified.

The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.7.4 Any New Information Requiring New Analysis or Verification?

Although it is not considered "new information" for CEQA purposes, the City of Culver City General Plan 2045 went into effect on October 9, 2024. The General Plan 2045 is intended as a long-range planning document that serves as a roadmap for future decisions concerning a variety of issues, including land use, economic growth, transportation, housing, climate change, and more. As indicated above, the Project Site's new land use and zoning designation is "Mixed Use Corridor 2" (MU-2). The Modified Project's proposed uses are allowed under these designations. The Modified would also be developed per the applicable development standards of the updated Zoning Code. Thus, the Modified Project would not result in conflicts with the applicable General Plan or Zoning Code or any other applicable land use plan, policy, or regulation such that significant physical impacts on the environment would occur. Impacts for the Modified Project would be less than significant.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to land use and planning that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.7.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.7.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.8 Noise

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No	No	No	No

3.8.1 Impact Determination in the Certified EIR

With regards to noise Thresholds (a), the Certified EIR concluded that construction-related noise impacts would be potentially significant for the Approved Project. Implementation of Mitigation Measures NOISE-1 and NOISE-2 would reduce construction related noise impacts to a less than significant level. With regard to Threshold (b), the Certified EIR concluded that vibration impacts would be less than significant.

3.8.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a).

Construction Noise

Construction activities and equipment associated with the Modified Project would be similar to the Approved Project. As with the Approved Project, the Modified Project would be constructed using typical construction techniques, no impact pile driving would be used. Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Modified Project construction could produce maximum noise levels of 74 A-weighted decibels (dBA) to 89 dBA at a reference distance of 50 feet from the noise source.

The Modified Project would result in potentially significant impacts if Project construction occurred outside of the allowable CCMC permitted hours of 8:00 PM and 8:00 AM Monday through Friday; 7:00 PM and 9:00 AM Saturdays; and 7:00 PM and 10:00 AM Sundays; or, if Project-related operations would cause ambient noise levels to increase by 5 dBA Leq or more. However, as with the Approved Project and per Mitigation Measure NOISE-1, the Modified Project would install a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 12 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north (Heritage Park Neighborhood) and west (Studio Village Town Homes), Temple Akiba, and Circle K Motel. Temporary noise barriers would be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors to the north and west of the Project Site during the duration of construction activities. Both the Approved Project and the Modified Project would implement Project

Design Features PDF-NOISE-1, PDF-NOISE-3, and PDF-NOISE-4 during construction activities to help ensure construction noise levels are minimized. In addition, as with the Approved Project, the Modified Project would implement Mitigation Measure NOISE-2, which includes construction equipment maintenance and performance requirements. With the temporary sound barrier and construction equipment requirements, as with the Approved Project, construction noise levels are estimated to reach a maximum of 66 dBA at the nearest noise sensitive receptors. Thus, impacts related to on-site construction noise under the Modified Project would be less than significant, similar to the Approved Project.

Off-Site Construction Activities

As with the Approved Project, the Modified Project would require the use of delivery and haul truck trips during various phases of construction, although no truck trips would occur between 8:00 PM and 8:00 AM Monday Through Friday, before 9:00 AM or after 7:00 PM on Saturday, or before 10:00 AM and 7:00 PM on Sunday. The Modified Project's maximum number of daily haul truck trips would be similar or less than the Approved Project, but with no subterranean parking, the Modified Project's use of haul trucks would occur over a much shorter duration than the Approved Project. As with the Approved Project, the Modified Project's truck trips per day would result in a negligible noise level increase and would not increase noise levels by a "clearly noticeable" increase of 5 dBA over the ambient condition. As with the Approved Project, the Modified Project's off-site construction noise impacts would be less than significant, similar to the Approved Project.

Operational Noise

Operation On-Site Noise

The existing noise environment in the Project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. As with the Approved Project, the Modified Project's long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site. Noise generated by the Modified Project would result primarily from normal operation of the building mechanical equipment, outdoor/open space activities, parking garage, loading docks and refuse collection, and off-site traffic.

Fixed Mechanical Equipment

As with the Approved Project, the Modified Project's operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses (see Project Design Feature PDF-NOISE-2). It is not anticipated that the mechanical equipment would be significantly different under the Modified Project compared to the mechanical equipment proposed under the Approved Project. In addition, as with the Approved Project, the Modified Project would comply with the City's noise standards, which establish maximum permitted noise levels from mechanical equipment. As such, compliance with the City's noise standards would ensure that operational noise impacts are minimal. Therefore, noise impacts from fixed mechanical equipment during operation under the Modified Project would be less than significant, similar to the Approved Project.

Outdoor/Open Space Activities

Under the Approved Project, there would be ground level outdoor spaces on the perimeter of the site and interior outdoor spaces, with the largest perimeter open space located on the northwest corner (Machado

Park). As with the Approved Project, the Modified Project would incorporate PDF-NOISE-5 requiring all permanent sound systems within outdoor open space areas to be designed and installed so as to not result in a meaningfully perceivable increase in noise beyond the Project Site. As analyzed in the Certified EIR, these spaces were all found to result in likely imperceptible noise levels at nearby noise sensitive rectors due to their distance and/or shielding by the building envelope. The Modified Project would also include perimeter and interior open space areas with similar levels of activity, similar to the Approved Project. As with the Approved Project, the change in noise levels at nearby noise sensitive receptors would be negligible and generally imperceptible. Furthermore, all on-site activities would be subject to compliance with applicable Culver City operational noise regulations and requirements, such as those included in the CCMC. Therefore, noise impacts from outdoor/open space activities under the Modified Project would be less than significant, similar to the Approved Project.

Parking Garage

The Modified Project's centrally located parking spaces are provided in the proposed wrap scheme, eliminating the need for any subterranean parking. As with the Approved Project, the Modified Project's access to the interior (shielded from view) parking would be from accessways located along Machado Road and Sepulveda Boulevard. The accessways under the Approved Project and the Modified Project are in generally similar locations. As analyzed in the Certified EIR, the noise generated by vehicles entering/exiting the parking garage would not result in significant increases in ambient noise levels. Because the Modified Project generate less traffic than the Approved Project it would also not result in significant increases in ambient noise levels from parking garage ingress/egress. Therefore, impacts related to noise generated by the parking garage under the Modified Project would be less than significant, similar to the Approved Project.

Loading Dock and Refuse Collection

As with the Approved Project, loading and refuse collection for the Modified Project would be located off of Machado Road in a similar location as under the Approved Project. With less commercial space under the Modified Project, there would be less loading area activities than under the Approved Project associated commercial deliveries. Regardless, during the time periods that trucks maneuver into the loading area, ambient noise level would be temporarily increased due to the contribution from trucks maneuvering, but the increase would be less than 3 dBA under either the Approved Project or the Modified Project. In addition, loading truck activity is intermittent and would not result in permanent increase in ambient noise levels at nearby sensitive receptors. As such, impacts would be less than significant under the Modified Project, with impacts being similar to the Approved Project.

Operation Off-site (traffic noise)

As analyzed in the Certified EIR, operational traffic noise levels from the Approved Project concluded that the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.3 dBA, CNEL (community noise equivalent level), which would occur along Slauson Avenue, west of Jefferson Boulevard. The maximum cumulative noise increase from the Project plus related Project traffic would be 1.1 dBA CNEL, which would occur along Sepulveda Boulevard at the Project driveway and Janisann Avenue. These increases in noise levels would be well below a "clearly noticeable" increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in sound level would be lower at the remaining roadway segments analyzed. As discussed under Section 3.17,

Transportation, the trip generation and vehicles miles travelled under the Modified Project would be less than the Approved Project. Thus, mobile-source source noise levels would be reduced under the Modified Project and any traffic noise increase would be well below a "clearly noticeable" increase of 5.0 dBA. As such, impacts related to traffic noise generated under the Modified Project would be less than significant, similar to the Approved Project.

Overall, as the Modified Project and the Approved Project would both implement the same Project Design Features (PDF-NOISE-1 to PDF-NOISE-5) and Mitigation Measures NOISE-1 and NOISE-2, and in consideration of the analysis above, construction and operational noise impacts under the Modified Project would be less than significant (after mitigation for construction) and similar to the Approved Project.

Threshold (b). Similar to the Approved Project, construction of the Modified Project would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under the Modified Project would be similar to the Approved Project, the Modified Project would have similar impacts associated with structural damage from on-site construction activities when evaluated at the surrounding structures. As with the Approved Project, the Modified Project would not result in vibration levels that exceed the threshold for structural damage of 0.2 PPV (in/sec) at the surrounding receptors. Therefore, impacts with regard to structural damage would be less than significant under the Modified Project, and similar to the Approved Project. In regard to human annoyance, both the Approved Project and the Modified Project would produce largely imperceptible vibration levels that would not exceed applicable thresholds at the nearest vibration-sensitive receptors. Therefore, construction-related vibration impacts under the Modified Project would be less than significant and similar to the Approved Project.

During operation, as with the Approved Project, the Modified Project would include typical stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or human annoyance impacts to the on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking structure, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under the Modified Project would be located and screened to reduce noise impacts, similar to the Approved Project. Therefore, operation-related vibration impacts under the Modified Project would be less than significant and similar to the Approved Project.

Cumulative Impacts

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. Noise would normally affect the areas immediately adjacent to the source, specifically areas that are less than 500 feet. Cumulative noise impacts could occur at receptor locations that are within 500 feet from two different sources. Therefore, based on a 500-foot screening distance, the cumulative noise impacts analysis is limited to related projects within 1,000 feet of the Project Site. The 1,000-foot distance assumes that a noise-sensitive receptor would be located halfway between the Project Site and the related project. However, the cumulative impacts on roadway noise would be affected by traffic from all cumulative projects throughout a larger vicinity.

Since all of the related projects analyzed in the Draft EIR are located outside of the 1,000-foot screening distance for projects that would contribute to cumulative noise impacts, construction of any of the related projects would not combine to cumulatively impact any of the sensitive receptors adjacent to the Project Site. No new related projects are known to be within 1,000 feet of the Project Site. With regard to off-site construction noise, construction traffic from all related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and would have varied haul routes and traffic patterns associated with their construction.

During operation, cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. The maximum cumulative noise increase from the Project plus cumulative project traffic would occur along Jefferson Boulevard between Slauson Avenue and Sepulveda Boulevard adjacent to commercial uses, along the Project driveway/Janisann Avenue west of Sepulveda Boulevard adjacent to residential uses, and along Sepulveda Boulevard between the Project driveway/Janisann Avenue and Jefferson Boulevard (N) adjacent to commercial uses. The Draft EIR showed the maximum traffic noise increase would be 0.5 dBA, which is well below 5 dBA noise increase threshold for a significant impact. As the Modified Project would reduce traffic levels compared to the Approved project, its contribution to cumulative traffic noise increases would also be less than significant, similar to the Approved Project.

The CCMC-required provisions that limit stationary-source noise from items such as roof-top mechanical equipment would ensure noise levels would be less than significant at the property line for each related project. In addition, all of the related projects are located greater than 1,000 feet from the Project Site and on-site noise generated by each related project would not result in an additive increase to Project-related noise levels. Further, noise from other stationary sources, including the parking structure, open space activity and loading dock would be limited to areas in the immediate vicinity of each related project. Although each related project could potentially impact an adjacent sensitive use, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site. As with the Approved Project, the Modified Project's operational noise impacts would be less than significant, and cumulative impacts would be similar to the Approved Project.

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative construction- or operational-period impacts with respect to groundborne vibration. Therefore, cumulative impacts would be less than significant under the Modified Project, with impacts being similar to the Approved Project.

3.8.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.8.4 Any New Information Requiring New Analysis or Verification?

Although it is not "new information" for CEQA purposes, the City of Culver City General Plan 2045 went into effect on October 9, 2024. The updated Noise Element aims to better manage and mitigate noise pollution in the city including updated noise sources, enhanced noise disturbance prohibitions, improved measurement standards, and community involvement. The Modified Project would not conflict with the goals and policies therein pertaining reducing or prohibiting new sources of intrusive noise and effectively enforcing noise standards as all noise impacts would be less than significant, with mitigation as applicable.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to noise that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.8.5 Certified EIR's Mitigation Measures Addressing Impact

The following mitigation measure set forth in the Certified EIR addresses construction-related noise impacts and would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant noise impacts would result from implementation of the Modified Project

Construction Noise

> **NOISE-1:** Prior to the commencement of demolition, the Project shall provide a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 12 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north (Heritage Park Neighborhood) and west (Studio Village Town Homes), Temple Akiba, and Circle K Motel. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors to the north and west of the Project Site during the duration of construction activities. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.
>
> **NOISE-2**: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation onsite demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA.[7] The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed

[7] FHWA, Special Report – Measurement, Prediction, and Mitigation: Chapter 4 Mitigation, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed October 12, 2020.

muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

3.8.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.9 Population and Housing

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less Than Significant	No	No	No	No

3.9.1 Impact Determination in the Certified EIR

With regards to population and housing, Threshold (a), the Certified EIR concluded that impacts would be less than significant.

3.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a). As with the Approved Project, the Modified Project would increase occupancy of the existing Project Site. The Modified Project would include construction of 344 residential units, which would generate an increase of 114 residential units compared to the Approved Project's 230 residential units. Based on an average household size of 2.3 used in the EIR, the Approved Project would generate population of 529, in addition to its 206 employees (net increase of 112 employees over existing conditions). The Modified Project's 344 units generate a residential population of 791 persons, in addition to six (6) employees (net decrease of 88 employees compared to existing conditions).

As with the Approved Project, the Modified Project's population increase would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's Regional Housing Needs Allocation (RHNA), provide the type of high density residential development encouraged in the City's General Plan, and SCAG 2020–2045 RTP/SCS policies. With regard to employment, there would be a net decrease in employees on the Project Site compared to existing conditions. Because there are no residential units currently on the Project Site, the development would not result in the displacement of a substantial number of people. Thus, as with the Approved Project, the Modified Project, would result in a less than significant population, housing, and employment impacts. Therefore, as SCAG's population and housing projections are not anticipated to be exceeded, impacts with respect to substantial unplanned

population growth under Modified Project would be less than significant and similar to the Approved Project.

Cumulative Impacts

The projected household and employment growth for the related projects within the City and the Modified Project would be within the 2045 SCAG projections identified in the 2020 RTP/SCS and the 2024 RTP/SCS for the City (discussed below). The projected cumulative population growth for the Project and related projects within the City of Culver City would exceed the 2045 SCAG projections identified in Connect SoCal for the City, as analyzed in the EIR. Despite the cumulative population growth exceeding the SCAG projections, this growth is consistent with the 6th Cycle RHNA allocations. The increases in population and households show that the City is actively increasing the housing stock within the City to meet the housing growth need based on its Housing Element and the 6th Cycle RHNA allocations. The City's allocation of housing between October 2021 and October 2029 is 3,341 units. The increase in housing stock in the City provides opportunities to reduce the demand for development in lower-density areas and achieving greater efficiency in the provision and use of existing services and infrastructure. Furthermore, as discussed throughout this Addendum, no new significant and unavoidable impacts associated with the operation of the Modified Project have been identified. For these reasons, the Modified Project, as with the Approved Project, would not substantially contribute to a cumulatively considerable impact.

3.9.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.9.4 Any New Information Requiring New Analysis or Verification?

Although the 2024 RTP/SCS has not been certified by CARB for GHG reduction purposes, it nevertheless contains SCAG's latest growth projections, which the Modified Project is fully consistent with. Although it is not "new information" for CEQA purposes, SCAG's 2024–2050 RTP/SCS, known as Connect SoCal 2024, includes SCAG's updated population, households and employment projections for the region as well as local jurisdictions up through 2050. As with the Approved Project, the Modified Project's contribution of population and households would be a small fraction of and well within the 2050 regional buildout projections. Also, as stated above, the projected cumulative population growth for the Project and related projects within the City of Culver City would exceed the 2045, as well as the 2050, SCAG household and population projections identified in Connect SoCal for the City. Despite the cumulative population growth exceeding the SCAG projections, this growth is consistent with the 6th Cycle RHNA allocations. The increases in population and households show that the City is actively increasing the housing stock within the City to meet the housing growth need based on its Housing Element and the 6th Cycle RHNA allocations. The City's allocation of housing between October 2021 and October 2029 is 3,341 units. The increase in

housing stock in the City provides opportunities to reduce the demand for development in lower-density areas and achieving greater efficiency in the provision and use of existing services and infrastructure. Furthermore, as discussed throughout this Addendum, no new significant and unavoidable impacts associated with the operation of the Modified Project have been identified. For these reasons, the Modified Project, as with the Approved Project, would not substantially contribute to a cumulatively considerable impact, not have a significant Project-level impact.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to population and housing that would show that (1) the Modified Project would have one or more significant effects not discussed in the certified SCEA; (2) significant effects previously examined will be substantially more severe than shown in the certified SCEA; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the certified SCEA would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure.

3.9.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.9.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.10 Public Services

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:					
i) Fire protection?	Less Than Significant	No	No	No	No
ii) Police protection?	Less Than Significant	No	No	No	No

3.10.1 Impact Determination in the Certified EIR

With regards to public services, Thresholds a(i) and a(ii), the Certified EIR concluded that impacts to fire protection and police protection would be less than significant.

3.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a.i). As with the Approved Project, the Modified Project would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection, response times, emergency access, and water infrastructure. As with the Approved Project, the Modified Project would be subject to compliance with the Culver City Fire Code (CCFC) requirements (including Chapter 33 of the 2019 CFC, Fire Safety During Construction and Demolition) which includes requirements to avoid substantial fire risk during construction activities. Regarding emergency access and response times during construction activities, incorporation of PDF-TRAF-1 would limit potential conflicts with traffic on local streets, schedule construction equipment delivery, and schedule routine management meetings with City Staff and other representatives to ensure related construction projects are managed in collaboration with one another. Thus, impacts would be less than significant. Therefore, impacts to fire services during construction under the Modified Project would be less than significant and similar to the Approved Project.

During operation, as with the Approved Project, the Modified Project would increase occupancy at the Project Site and generate an increase of population necessitating fire protection services. However, the total population generated by the Project would represent a very small percentage of the total population in the City. Additionally, the Culver City Fire Department (CCFD) had plans at the time of the Certified EIR to add a third rescue, which would consist of two staff, housed at Fire Station 2, to assess changes in demand for fire protection services and the potential need for additional staff and equipment, or new or expanded facilities, to maintain adequate levels of service. Incorporation of PDF-FIRE-1 and PDF-FIRE-2 would require the Project to include fire protection devices and improve fire lane fire hydrant locations and associated fire prevention/suppression equipment to reduce fire protection demands. Regarding response times, as with the Approved Project, the Modified Project would be well served by alternative surrounding roadways with multiple alternative routes for emergency access and be consistent with CVC Section 21806 for adequate CCFD emergency responses. As such, response times during operation would be less than significant. Regarding emergency access, as with the Approved Project, the Modified Project would provide emergency access via the three streets bordering the Project Site including Sepulveda Boulevard, Jefferson Boulevard, and Machado Road. Additionally, the PDF-FIRE-2 would ensure adequate access to and within the Project Site for emergency vehicles. As such, emergency access during operation would be less than significant. Lastly, as with the Approved Project, the Modified Project would be served by a loop system that connects to a 12-inch lateral in Jefferson Boulevard and existing hydrants on the Project Site boundary. The Project would be consistent with current fire regulations and PDF-FIRE-2 requiring CCFD approval of fire hydrant locations.

The Modified Project, as with the Approved Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under the Modified Project, as with the Approved Project, would be less than significant. Because the Modified Project would increase Project Site service population (residents to employees) by 63 persons (798-735 = 63) compared to the Approved Project, fire

protection service needs under the Modified Project would be slightly greater than the Approved Project. However, neither the Approved Project nor Modified Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Approved Project and the Modified Project.

Threshold (a.ii). As with the Approved Project, the Modified Project would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Approved Project, the construction of the Modified Project could increase potential demand for Culver City Police Department (CCPD) services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce CCPD demand during construction, as with the Approved Project, the Modified Project would include enclosed security fencing with security lighting and be patrolled periodically by security personnel per PDF-POL-1. Regarding police access and response times, construction staging and construction worker parking would be provided on-site to limit potential conflicts with traffic on local streets. Additionally, private security personnel during Project construction would also reduce any demand for CCPD services. As with PDF-POL-1, the Project Site would include security fencing, lighting, and security personnel to reduce the potential for incidents requiring police responses. Incorporation of PDF-TRAF-1 would require implementation of a City-approved Final Construction Management Plan (FCMP) to minimize disruptions to traffic flow and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. Based on the above, as with the Approved Project, the Modified Project would comply with the FCMP, CCPD and project design features to reduce police protection and impacts would be less than significant. Therefore, impacts to police services during construction under the Modified Project would be less than significant and similar to the Approved Project.

During operation, as with the Approved Project, the Modified Project would increase the occupancy at the Project Site and generate an increase of population necessitating police protection services. However, the total population generated by the Project would represent a very small percentage of the total population in the City. Under PDF-POL-2, the Project would include a 24-hour/seven-day-a-week security program, full-time on-site security personnel, and controlled access to the Project Site, security lighting, closed circuit television surveillance (CCTV) for the parking structure and other areas, and other features. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and reduce demand for CCPD services. As with the Approved Project, the Modified Project would comply with CCMC Section 17.560 to ensure that the site design incorporates required security and crime reduction features. Regarding police access and response times during operation, the Modified Project and the Approved Project would both provide access via the surrounding roadways. Under both the Approved Project and the Modified Project, CCPD responses for high priority calls would be facilitated through the use of sirens to clear path of travel, use alternative routes, and multiple unit response.

The Modified Project, as with the Approved Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under the Modified Project, as with the Approved Project, would be less than significant. Because the Modified Project would increase Project Site service population by 792 persons (residential only) compared to the Approved Project's 529 persons, fire protection service needs under the Modified Project would be slightly greater than the Original Project.

However, neither the Original Project nor Modified Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Project and the Modified Project.

Cumulative Projects

As with the Approved Project, implementation of the related projects identified in the certified EIR in concert with the Modified Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for public services. Similar to the Modified Project, the related projects would be subject to the Fire Code and other applicable regulations of the CCMC to reduce demands on fire and police services; subject to the review and oversight of the CCPD related to crime prevention features, and other applicable regulations of the CCMC to reduce demands on police services. Thus, cumulative development would not cause the need for new or altered governmental facilities, the construction of which could result in a significant impact. Therefore, the cumulative impact on public service facilities under the Modified Project would be less than significant and similar to the Approved Project.

3.10.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.10.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to paleontological resources that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.10.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.10.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.11 Transportation

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less Than Significant	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Potentially Significant	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

3.11.1 Impact Determination in the Certified EIR

With regards to transportation, Thresholds (a), (c) and (d), the Certified EIR concluded that impacts would be less than significant for the Approved Project. For Threshold (b), the Certified EIR concluded that impacts would be less than significant with implementation of Mitigation Measure TRAF-1.

3.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Threshold (a). As with the Approved Project, the Modified Project would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. Similar to the Approved Project, the Modified Project would promote active transportation modes by locating housing near high-frequency transit and providing secure bicycle parking and convenient pedestrian access, expand multifamily housing opportunities while preserving the local neighborhood character, and increasing safety by removing existing driveways on-site (eight driveways removed under the Modified Project). Similar to the Approved Project, the Modified Project would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts related to conflicts with programs, plans, ordinances or policies under the Modified Project would be less than significant and similar to the Approved Project.

Threshold (b). The Approved Project is estimated to produce a total of 4,934 daily vehicle trips and a total daily VMT of 32,774. Based on the Trip Generation Analysis for 11111 Jefferson Boulevard Culver City,

dated April 1, 2025, included as Appendix A, the Modified Project is expected to generate fewer trips than the Approved Project and would result in a net reduction of 150 morning peak hour trips and a net reduction of 358 afternoon peak hour trips when compared to the Approved Project. With fewer trips, transportation related impacts, including VMT, would be less under the Modified Project than the Approved Project. Also, as the Modified Project does not include office uses, it would remove the Approved Project's potentially significant VMT impacts associated with the formerly contemplated office use and as such, Mitigation Measure TRAF-1 would not be necessary under the Modified Project. Overall, as with the Approved Project, VMT impacts would be less than significant under the Modified Project.

Threshold (c). As with the Approved Project, the Modified Project would provide pedestrian access to the Project Site via new 8-foot-wide sidewalks around the perimeter of the Project Site and through pedestrian plazas and courtyards. The Modified Project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. As opposed to the three driveways proposed under the Approved Project, the Modified Project would provide two driveways, one along Sepulveda Boulevard and one along Machado Road to reduce transportation hazards. Additionally, pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops as with the Approved Project. As with the Approved Project, the Modified Project would avoid and minimize potential conflict with transit services, parking entrances, and pedestrian traffic by relocating bus stops, installing marker crosswalks, and providing curb and sidewalk to separate pedestrian movements from vehicular movements. Additionally, as with the Approved Project, the Modified Project would install a new traffic signal at the Project driveway on Sepulveda Boulevard, where it intersects with Janisann Avenue to provide a safe crossing for pedestrians to access the Project Site from the Sunkist Park neighborhood across Sepulveda Boulevard. Therefore, impacts related to geometric hazards due to a design feature or incompatible uses under the Modified Project would be less than significant and similar to the Approved Project.

Threshold (d). As with the Approved Project, the Modified Project would include temporary construction activities and traffic that could potentially affect emergency access to the Project Site and surrounding areas. Thus, incorporation of PDF-TRAF-1, which requires construction staging and construction worker parking to be accommodated on the Project Site would reduce impacts on emergency access during construction activities. Additionally, PDF-TRAF-1 includes construction management meetings with City Staff and other representatives of surrounding developments if concurrent construction occurs to ensure that concurrent construction projects are managed in collaboration with one another. As with the Approved Project, the Modified Project would coordinate with the CCPD and CCFD concerning any planned temporary lane closures and other construction activities that could affect emergency access. Thus, impacts regarding emergency access during construction under the Modified Project would be less than significant and similar to the Approved Project.

During operation, as with the Approved Project, the Modified Project would comply with CCMC Chapter 17.540 which requires that new projects be reviewed by the CCPF to ensure that public safety and site security measures are incorporated. Under both the Approved Project and the Modified Project, incorporation of PDF-FIRE-2 would ensure that the CCFD would review and approve plans for the building, fire lanes, and associated turnarounds, fire hydrant locations, and associated equipment, to ensure adequate access to and within the Project Site for emergency vehicles. Therefore, impacts related to

inadequate emergency access during operation under the Modified Project would be less than significant and similar to the Approved Project.

Cumulative Impacts

Each of the related projects would be separately reviewed and approved by the City, including a review of consistency with applicable policies. Collectively, the Modified Project and the related projects are located within a SCAG-designated High Quality Transit Areas (HQTAs) and would add development and density in an area with transit options and high levels of pedestrian activity. Therefore, the Modified Project in combination with the related projects would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Similar to the Approved Project and the Modified Project, any related project that would be subject to environmental review would be required to evaluate VMT on a project-by-project basis. If the related project were determined to have potentially significant VMT impacts, it would be required to include appropriate mitigation measures to reduce VMT impacts to a less-than-significant level.

With regard to design hazards, the Modified Project would not result in a significant impact for geometric hazards. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Thus, impacts would be less than significant. Therefore, cumulative impacts associated with hazardous design conditions under the Modified Project would be less than significant and similar to the Approved Project.

With regard to emergency access, the Modified Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As with the Approved Project, the Modified Project and related projects would implement a Construction Traffic Management Plan to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans would ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Modified Project. Furthermore, each of the related projects would be required to coordinate with CCFD and CCPD for site plan reviews and to ensure that emergency access is maintained at all times.

Overall, cumulative impacts would be less than significant under the Modified Project, with impacts being similar to the Approved Project.

3.11.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.11.4 Any New Information Requiring New Analysis or Verification?

Although it is not "new information" for CEQA purposes, the City of Culver City General Plan 2045 went into effect on October 9, 2024. The General Plan 2045 update to the previous General Plan is intended as a long-range planning document that serves as a roadmap for future decisions concerning a variety of issues, including land use, economic growth, transportation, housing, climate change, and more.

The Culver City Mobility Element underwent significant updates as part of the General Plan 2045 including a focus on multimodal transportation, downtown corridor improvements, enhanced safety measures, community engagement, and environmental considerations.

The Mobility Element identifies existing community mobility-related concerns and opportunities, and established goals, policies, and guidance to address these concerns for the future improvement of the transportation network, considering emerging technologies and innovations. The Modified Project is consistent with the Mobility Element's goals including Goal M-1: a transportation network that is safe and accessible for all ages, physical abilities, and financial means; Goal M-4: a transportation system that provides affordable or free, equitable, and efficient access to employment centers, residential communities, schools, and other essential services; and Goal M-8: an active transportation network that supports healthy living and expands access to social determinants of health.

As with the Approved Project, the Modified Project is located in an urbanized area of the City with existing roadway infrastructure. The Modified Project would provide a safe and accessible transportation network within the Project Site by providing bicycle parking that promotes active transportation, relocate transit stops to avoid transportation hazards, improve pedestrian safety and accessibility throughout the Project Site and property perimeter, and incorporate a traffic signal to provide safe transportation and pedestrian access along Sepulveda Boulevard and along Janissan Avenue. As with the Approved Project, the Modified Project incorporates publicly accessible open space areas that further enhances the pedestrian network and connects to nearby residential, commercial, and retail uses in the Project vicinity. Therefore, impacts related to conflicts with the new goals and objectives of the Mobility Element under the Modified Project would be less than significant and similar to the Approved Project.

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to air quality that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2)

significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.11.5 Certified EIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified EIR to addresses transportation-related VMT for the Approved Project's office uses. However, the Modified Project does not include an office use and as such, Mitigation Measure TRAF-1 is not applicable to the Modified Project. No additional mitigation measures are required, as no new significant noise impacts would result from implementation of the Modified Project

> **TRAF-1:** The Project shall implement a Transportation Demand Management (TDM) Program to reduce the VMT impacts from office uses. The TDM Program shall be reviewed and approved by the City's Planning Division, Public Works Mobility and Traffic Engineering, Division and Transportation Staff for review prior to the issuance of the first building permit for the Project. The TDM Program shall include the following measures and strategies:
>
> - Commute Marketing Program – This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. At a minimum, this strategy includes educational and promotional materials, and a TDM Coordinator from building management to oversee the TDM program, such as field questions, manage regular updates of transportation materials for the Project Site, and coordinate carpool and ridesharing options.
> - Off-Street Parking Pricing – This strategy implements parking pricing for spaces within the Project Site for office employees. This would mean that employees of the office land use would need to pay for a parking spot within the Project Site garage, separate from the cost of the lease for the office space.

3.11.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.12 Tribal Cultural Resources

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRIBAL CULTURAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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)?	No Impacts	No	No	No	No
(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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	No Impacts	No	No	No	No

3.12.1 Impact Determination in the Certified EIR

With regards to tribal cultural resources, Thresholds (i) and (ii), the Certified EIR concluded that impacts would not occur under the Approved Project.

3.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Thresholds (i)-(ii). As with under the Approved Project, no known tribal cultural resources would be disturbed during construction activities under the Modified Project. However, grading and site preparation activities for the Modified Project may encounter unknown tribal cultural resources, similar to the Approved Project. However, it is acknowledged that the Modified Project would not require excavation for a subterranean parking. Similar to the Approved Project, the Modified Project would implement Mitigation Measures ARCH-2 and ARCH-3 listed in Section 3.2, *Cultural Resources*, which includes provisions for the Applicant to retain a Native American representative to monitor construction excavation associated with implementing the Project. While no known tribal cultural resources are anticipated to be affected by the Project, the City has prescribed Mitigation Measures ARCH-2 and ARCH-3 to address any inadvertent discovery of a prehistoric archeological resources. Therefore, no impacts to known tribal cultural resources would under the Modified Project, similar to the Approved Project.

3.12.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified in September 2021, the former on-site buildings were removed from the Project Site. No new major development has occurred adjacent to the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no other major changes have occurred that would constitute changed circumstances for undertaking the Modified Project. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

3.12.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Project relative to paleontological resources that would show that: (1) the Modified Project would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined would be substantially more severe than shown in the Certified EIR; (3) mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Modified Project, but the Modified Project proponents declined to adopt the mitigation measure; or (4) mitigation measures which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Modified Project proponents declined to adopt the mitigation measure.

3.12.5 Certified EIR's Mitigation Measures Addressing Impact

None required.

3.12.6 Conclusion

Based on the above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.13 Addendum Conclusion

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to the impacts addressed in the Certified EIR for the Approved Project. No substantial changes have occurred with respect to the circumstances under which the Modified Project is being undertaken that would require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR of the Approved Project would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures that were previously considered infeasible but

are now considered feasible that would reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

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Appendix A
Transportation Memorandum

Gibson transportation consulting, inc.

MEMORANDUM

TO: Torey Kiss, Lincoln Properties

FROM: Richard Gibson

DATE: April 1, 2025

RE: Trip Generation Analysis for 11111 Jefferson Boulevard
Culver City, California **Ref:** J2158

Gibson Transportation Consulting, Inc. prepared a trip generation analysis of the 344-unit multi-family development located at 11111 Jefferson Boulevard (Project Site) in Culver City, California (City). This memorandum summarizes our analysis.

PROJECT BACKGROUND

The Project Site, currently vacant land bound by Machado Road to the north, Jefferson Boulevard to the east, and Sepulveda Boulevard to the south and west, is currently entitled for development of 230 mid-rise multi-family dwelling units, a 38,600 square foot (sf) grocery store, 11,450 sf of office space, 3,900 sf of specialty retail, a 1,950 sf gym 3,300 sf of high-turnover sit-down restaurant, 4,900 sf of fast casual restaurant, and 2,400 sf of fast food restaurant (Approved Project). The transportation analysis of the Approved Project is provided in *11111 Jefferson Project Transportation Impact Study* (Fehr & Peers, April 2021) (Transportation Study).

The Approved Project was never constructed and the Applicant proposes to replace the current entitlements with up to 344 multi-family dwelling units and up to 2,000 sf of retail space (Project). Access to the proposed parking garage would be provided via two driveways, one off Machado Road and one off of Sepulveda Boulevard. A preliminary site plan for the Project is shown in Figure 1.

METHODOLOGY

This trip generation analysis for the Project Site compared the trip generation of the Project to the trip generation of the Approved Project outlined in the Transportation Study and assessed whether the Project trip generation is equal to or less than that of the Approved Project.

APPROVED PROJECT TRIP GENERATION

As identified in the Transportation Study, the number of trips expected to be generated by the Approved Project was estimated by applying rates published in *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, 2017).

The trip generation forecast reflected appropriate trip generation reductions to account for trips shared between the different uses within the Project Site and mode split trips as outlined below:

- Internal capture adjustments of 10% to account for person trips made between distinct land uses within a mixed-use development without using an off-site road system.

- The Project Site is located in the vicinity of multiple transit, walking, and bicycling opportunities; thus, a 5% mode split reduction was applied to account for multimodal non-auto usage, including transit, bicycle, and walking arrivals.

As shown in Table 1, the Transportation Study estimated that the Approved Project would result in 142 net new external trips (67 inbound and 75 outbound) during the morning peak hour and 274 net new external trips (157 inbound and 274 outbound) during the afternoon peak hour.

PROJECT TRIP GENERATION

Trip generation for the Project was calculated based on rates found in *Trip Generation Manual, 11th Edition* (Institute of Transportation Engineers, 2021). Reductions to account for internal capture and mode split were also applied for consistency with the Transportation Study.

Table 2 provides a summary of the Project trip generation. As shown, the Project is expected to generate a net reduction of eight trips (-40 inbound, 34 outbound) in the morning peak hour and a net reduction of 84 trips (-24 inbound, -60 outbound) in the afternoon peak hour when compared to the existing uses on-site.

TRIP GENERATION COMPARISON

Table 2 also provides a comparison between the trips generated by the Project and by the Approved Project. As shown, the Project is anticipated to generate fewer trips than the Approved Project and would result in a net reduction of 150 morning peak hour trips and a net reduction of 358 afternoon peak hour trips when compared to the Approved Project.

SUMMARY

The Project is anticipated to generate fewer trips than the Approved Project. Therefore, its transportation impacts would be less than those identified in the Transportation Study. As such, the Project would not result in any new traffic impacts nor any increase in the severity of transportation impacts as compared to the Approved Project.

Thus, the trip generation of the Project and its resulting effects on the transportation system are consistent with the findings of the transportation analysis contained in the Transportation Study and no further analyses are required.

Source: KFA Architects. March, 2025.

PROJECT SITE PLAN

FIGURE 1

TABLE 1
TRIP GENERATION
APPROVED PROJECT

Land Use	ITE Land Use	Size	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
TRIP GENERATION RATES [a]								
Multi-famly Housing (Mid-Rise)	221	per DU	26%	74%	0.36	61%	39%	0.44
High-Turnover Sit-Down Restaurant	932	per 1,000 sf	55%	44%	9.94	62%	38%	9.77
Fast Casual Restaurant	930	per 1,000 sf	67%	33%	2.07	55%	45%	14.13
Fast Food	933	per 1,000 sf	60%	40%	25.10	50%	50%	28.34
Gym/Fitness Club	492	per 1,000 sf	51%	49%	1.31	57%	43%	3.45
Office	710	per 1,000 sf	86%	14%	1.16	16%	84%	1.15
Supermarket	850	per 1,000 sf	60%	40%	3.82	51%	49%	9.24
Specialty Retail	[c]	per 1,000 sf	60%	40%	1.20	50%	50%	3.60
TRIP GENERATION ESTIMATES - PROJECT								
Approved Project								
Multi-Family Housing	221	230 du	22	61	83	62	39	101
Internal Capture Credit (10%)			(2)	(6)	(8)	(6)	(4)	(10)
Mode Split Adjusment (5%)			(1)	(3)	(4)	(3)	(2)	(5)
High-Turnover Sit-Down Restaurant	932	3,300 sf	18	15	33	20	12	32
Internal Capture Credit (10%)			(2)	(2)	(3)	(2)	(1)	(3)
Mode Split Adjusment (5%)			(1)	(1)	(2)	(1)	(1)	(1)
Passby Credit (20%)			(3)	(2)	(6)	(3)	(2)	(6)
Fast Casual Restaurant	930	4,900 sf	7	3	10	38	31	69
Internal Capture Credit (10%)			(1)	0	(1)	(4)	(3)	(7)
Mode Split Adjusment (5%)			0	0	0	(2)	(1)	(3)
Passby Credit (20%)			(1)	(1)	(2)	(6)	(5)	(12)
Fast Food	933	2,400 sf	36	24	60	34	34	68
Internal Capture Credit (10%)			(4)	(2)	(6)	(3)	(3)	(7)
Mode Split Adjusment (5%)			(2)	(1)	(3)	(2)	(2)	(3)
Passby Credit (20%)			(6)	(4)	(10)	(6)	(6)	(12)
Gym/Fitness Club	492	1,950 sf	2	1	3	4	3	7
Internal Capture Credit (10%)			0	0	0	0	0	(1)
Mode Split Adjusment (5%)			0	0	0	0	0	0
Passby Credit (20%)			0	0	(1)	(1)	(1)	(1)
Office	710	11,450 sf	11	2	13	2	11	13
Internal Capture Credit (10%)			(1)	0	(1)	0	(1)	(1)
Mode Split Adjusment (5%)			(1)	0	(1)	0	(1)	(1)
Supermarket	850	38,600 sf	88	59	147	182	175	357
Internal Capture Credit (10%)			(9)	(6)	(15)	(18)	(18)	(36)
Mode Split Adjusment (5%)			(4)	(3)	(7)	(8)	(8)	(16)
Passby Credit (20%)			(15)	(10)	(25)	(31)	(30)	(61)
Specialty Retail	[c]	3,900 sf	3	2	5	7	7	14
Internal Capture Credit (10%)			0	0	(1)	(1)	(1)	(1)
Mode Split Adjusment (5%)			0	0	0	0	0	(1)
Passby Credit (20%)			(1)	0	(1)	(1)	(1)	(2)
		Total Driveway Trips - Approved Project	159	143	302	299	266	565
		Total External Trips - Approved Project	134	127	261	253	224	477
Existing Use Credits								
External Trips	-	- -	(67)	(52)	(119)	(96)	(107)	(203)
		Net External Trips - Approved Project	**67**	**75**	**142**	**157**	**117**	**274**

Notes

sf = square feet, dwelling unit = du.

[a] Trip generation rates are from *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, 2017) to be consistent with Transportation Study

[b] Trip adjustments are consistent with trip adjustments found in Transportation Study

[c] Trip rates consisent with Transportation Study

TABLE 2
TRIP GENERATION ESTIMATE COMPARISON
PROJECT VS APPROVED PROJECT

TRIP GENERATION RATES [a]								
Land Use	**ITE Land Use**	**Size**	**AM Peak Hour**			**PM Peak Hour**		
			In	**Out**	**Total**	**In**	**Out**	**Total**
Multi-Family Housing (Mid-Rise)	221	per du	23%	77%	0.37	61%	39%	0.39
Strip Retail Plaza	822	per 1,000 sf	60%	40%	2.36	50%	50%	2.94
TRIP GENERATION ESTIMATES - PROJECT								
Revised Project								
Multi-Family Housing	221	344 du	29	98	127	82	52	134
Internal Capture Credit (10%)			(3)	(10)	(13)	(8)	(5)	(13)
Mode Split Adjusment (5%)			(1)	(4)	(6)	(4)	(2)	(6)
Strip Retail Plaza	822	2,000 sf	3	2	5	3	3	6
Internal Capture Credit (10%)			0	0	(1)	0	0	(1)
Mode Split Adjusment (5%)			0	0	0	0	0	0
Passby Credit (20%)			(1)	0	(1)	(1)	(1)	(1)
Existing Use Credits								
External Trips	-	- -	(67)	(52)	(119)	(96)	(107)	(203)
Net Project Trips								
Net New External Project Trips			(40)	34	(8)	(24)	(60)	(84)
External Trips - Net Increase/(Decrease) from Approved Project			**(107)**	**(41)**	**(150)**	**(181)**	**(177)**	**(358)**

Notes

sf - sqaure feet, dwelling unit = du.

[a] Trip generation rates are from *Trip Generation Manual, 11th Edition* (Institute of Transportation Engineers, 2023)

[b] Trip adjustments are consistent with trip adjustments found in Transportation Study