City of Culver City

FOX HILLS SPECIFIC PLAN

April 2026 | EIR Addendum

SCH #: 2022030144



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Culver City

Prepared for:

Contact: Troy Evangelho, AICP, Advance Planning Manager
9770 Culver Boulevard
Culver City, California 90232
310.253.5744

Prepared by:

PlaceWorks
700 South Flower Street, Suite 600
Los Angeles, California 90017
213.623.1443
www.placeworks.com

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ENVIRONMENTAL SUMMARY

PROJECT INFORMATION

Project Title: Fox Hills Specific Plan

Lead Agency Name and Address:
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

Contact Person and Phone Number:
Troy Evangelho, AICP, Advance Planning Manager
310.253.5744

Project Location: The proposed Fox Hills Specific Plan area is in the Culver City Planning Area, which includes Culver City and its sphere-of-influence (SOI) identified in the General Plan 2045. The proposed 280-acre Specific Plan area is in the Fox Hills Neighborhood, located in the southern part of the Culver City Planning Area. The proposed Specific Plan area is bound by the Culver City limits and/or the city's sphere-of-influence (SOI) as well as residential, commercial, light industrial (within the city limits) to the north, unincorporated Los Angeles County to the east, and the City of Los Angeles to the south and west.

Project Sponsor's Name and Address:
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

General Plan Designation: Land use designations include Medium Density Housing, High Density Housing, Mixed Use Medium, Mixed Use High, Parks and Open Spaces, and Cemetery (Culver City 2024a).

Zoning: Zoning includes Medium Density Multifamily (RMD), High Density Multifamily (RHD), Mixed Use Medium (MU-HD), Planned Development (PD), Open Space (OS), Cemetery (E), and Transportation (T)(Culver City 2024b).

Description of Project:

The proposed project (i.e., Fox Hills Specific Plan or Specific Plan) establishes a framework to guide future growth and public improvements within the Specific Plan area. The proposed project provides updated zoning and policies for private development, standards for streetscapes and mobility as well as future city actions to support a more connected and livable mixed-use community while maintaining the area's established green character. The proposed project would refine existing zoning and policy documents applicable to the Specific Plan area to ensure consistency with Picture Culver City: General Plan 2045 (General Plan 2045) goals and policies. No specific projects are proposed at this time, and the proposed project would provide standards to guide for future development in the Specific Plan area, as applicable. This Addendum evaluates potential environmental effects associated with adoption of the Specific Plan only. Any future implementing projects would be reviewed to determine whether CEQA applies, and what the appropriate level of CEQA review would be.

Surrounding Land Uses and Setting:
The Specific Plan area is generally bordered by commercial, medium-density multi-family residential, light industrial, and cemetery uses to the north; low-density residential (Ladera Heights), commercial, and place of worship uses to the east; West Centinela Avenue, commercial uses, Centinela Creek Channel, and Interstate 405 (I-405) to the south; and Sepulveda Boulevard, California State Route 90 (SR 90) , commercial, and restaurant uses to the west.

Other Public Agencies Whose Approval Is Required (e.g., Permits, Financing Approval, or Participating Agreement):
None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Section 3, *Environmental Analysis*, of this document summarizes the environmental impact conclusions of the Final Environmental Impact Report for the Picture Culver City: General Plan 2045 and Zoning Code Update, State Clearinghouse Number 2022030144, certified in September 2024 (i.e., Certified EIR) and concludes that the proposed project meets the conditions described in CEQA Guidelines Section 15164 for preparation of an Addendum.

DETERMINATION

On the basis of this initial evaluation:

☐ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.

☒ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. Changes and additions to the earlier CEQA document are needed to make the previous documentation adequate to cover the project which are documented in this Addendum (CEQA Guidelines Section15164). However, none of the conditions described in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR have occurred.

☐ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. However, there is important new information and/or **substantial changes have occurred** requiring the preparation of an additional CEQA document (Negative Declaration or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.

Signature	Date
Troy Evangelho, AICP, Advance Planning Manager	

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1. PURPOSE AND BACKGROUND

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. In accordance with CEQA, the City of Culver City (City) has prepared this Addendum to the Picture Culver City: General Plan 2045 (General Plan 2045) and Zoning Code Update Final Environmental Impact Report (certified September 2024, State Clearinghouse Number 2022030144) to address the potential environmental impacts associated with the Fox Hills Specific Plan (proposed project or Specific Plan) to allow the City, the lead agency under CEQA, to make an informed decision regarding approval of the proposed project.[1]

This Addendum is prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Sections 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Sections 15000 et seq.)

The General Plan 2045 and Zoning Code Update Final Environmental Impact Report (i.e., Certified EIR) was prepared to provide information about the potential environmental impacts associated with the update to the General Plan 2045 and the associated Zoning Code Update that was necessary to implement the General Plan 2045. The General Plan 2045 and Zoning Code Update included policies, diagrams, and standards to guide land use and development decisions for the City. Findings, Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program (MMRP) were adopted by the City at the time the General Plan 2045 and Zoning Code Update Final EIR was certified. The General Plan 2045 and Zoning Code Update was approved following the certification of the Final EIR and is referred to as the approved project.

The Certified EIR is a program EIR, as defined by CEQA Guidelines Section 15161, California Code of Regulations, Title 14, Division 6, Chapter 3, which was prepared in compliance with CEQA Guidelines Section 15168. The Certified EIR noted that subsequent projects that are consistent

[1] The preparation of the Fox Hills Specific Plan and associated requirements for adoption of the proposed project are being funded by the Southern California Association of Governments.

with the General Plan 2045 may tier from the Certified EIR, in accordance with CEQA Guidelines Section 15152. The Certified EIR described that subsequent projects may include specific plans and require development plans such as tentative maps, variances, and conditional use permits or other necessary approvals.

The purpose of tiering is to use the analysis of general matters in a broader EIR (such as the Certified EIR) for later CEQA documents on narrower projects, such as the proposed project (see CEQA Guidelines Section 15152). As demonstrated in this Addendum, the proposed project would be consistent with the General Plan 2045 goals, policies, and land use assumptions for the Fox Hills Neighborhood identified in the Certified EIR and is within the scope of the General Plan 2045. For these reasons, the CEQA review required for the proposed project may tier from the Certified EIR pursuant to CEQA Guidelines Section 15152.

1.2 APPLICABILITY AND USE OF ADDENDUM

Pursuant to CEQA and the State CEQA Guidelines, this Addendum focuses on whether implementation of the proposed project would require major revisions to the Certified EIR due to the potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects, pursuant to State CEQA Guidelines Section 15162.

Pursuant to Public Resources Code Section 21166 and Section 15162 of the State CEQA Guidelines, when an EIR has been certified or a negative declaration adopted for a project, no subsequent or supplemental EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

(1) 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;

(2) 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

(3) 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.

A supplement to an EIR (supplemental EIR), which is narrower in scope than a subsequent EIR, may be prepared if any of the above criteria apply, but "only minor changes or additions would be necessary to make the previous EIR adequately apply to the project in the changed situation" (CEQA Guidelines Section 15163(a)). In the absence of the need to prepare either a subsequent or supplemental EIR, an addendum to a previously Certified EIR may be prepared. Section 15164 states:

(a) The lead agency or a 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.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence. (CEQA Guidelines Section 15164)

This Addendum to the Certified EIR has been prepared because evaluation of the proposed project has not indicated any of the circumstances requiring a subsequent or supplemental EIR is required. As demonstrated in Section 3, *Environmental Analysis*, of this Addendum, the proposed project would not result in impacts that differ from the approved project, and it would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in CEQA Guidelines Sections 15162(a) and 15163(a).

This Addendum demonstrates that no substantial changes are proposed to the approved project or have occurred in the development area that would require major revisions to the Certified EIR or substantially increase the severity of previously identified significant effects (see CEQA Guidelines Section 15162[a][1]). Therefore, the impacts of the proposed project are within the levels and types of environmental impacts disclosed in the Certified EIR.

As substantiated in Section 3 of this Addendum, the proposed project would not result in new significant impacts or substantially increase the severity of the impacts of the approved project due to substantial changes in circumstances since the certification of the EIR (see CEQA Guidelines Section 15162[a][2]).

In addition, no information that was not known and could not have been known at the time the General Plan 2045 and Zoning Code Update Final EIR was certified has been revealed that shows new or substantially more severe significant impacts would result (see CEQA Guidelines Section 15162[a][3]). There are no new or considerably different mitigation measures that would substantially reduce one or more significant impacts of the approved project but that are not adopted.

Because this Addendum does not identify new or substantially more severe significant impacts, circulation for public review and comment is not necessary (CEQA Guidelines Section 15164[c]). However, the City has considered this Addendum together with the previously certified EIR prior to adoption of the proposed project, pursuant to CEQA Guidelines Section 15164(d).

1.3 FORMAT OF THIS ADDENDUM

The Certified EIR serves as the primary CEQA clearance document for the proposed project, and this Addendum provides minor changes and additions to the Certified EIR. This Addendum should be considered with the full text of the Certified EIR. All applicable mitigation measures from the Certified EIR would be applicable to the proposed project and are incorporated by reference into this Addendum. This Addendum relies on the use of an Environmental Checklist, as suggested in Section 15063(d)(3) of the CEQA Guidelines. Per the CEQA Guidelines, an addendum does not need to be circulated for public review but can be included in or attached to the Final EIR prior to making a decision on the project.

1.4 LEAD AGENCY AND DISCRETIONARY APPROVALS

The City, as the lead agency under CEQA, maintains authority to consider this Addendum for the adoption of the Specific Plan (i.e., the proposed project). It is the intent of the Addendum to evaluate the environmental impacts of the proposed project so that the City, responsible agencies, and interested parties can make informed decisions with respect to the requested approvals. The following discretionary approvals are required for the proposed project:

- Consideration of this Addendum to the Certified EIR and determination that no subsequent CEQA document is required;
- Adoption of the Fox Hills Specific Plan;
- Adoption of Zoning Map amendment to replace zoning district designations indicated on the Zoning Map with the proposed Specific Plan zoning; and
- Adoption of amendments to Title 17 (Zoning) of the Culver City Municipal Code to incorporate a new Fox Hills Specific Plan ordinance to regulate zoning consistent with the General Plan 2045.

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2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed Fox Hills Specific Plan area (Specific Plan area) is located within the Culver City Planning Area identified in the General Plan 2045 and Figure 4.10-1, *Planning Area*, of the Certified EIR. Specifically, the proposed project area is within the Fox Hills Neighborhood. The Culver City Planning Area covers approximately 3,910 acres, of which about 3,280 acres are within city limits, and approximately 630 acres are in the sphere of influence (SOI). The city is generally divided into 15 neighborhoods, as shown on Figure 4.10-2, Planning Area Neighborhoods, of the Certified EIR. The Fox Hills Neighborhood is in the southern part of the Culver City Planning Area and is within the city limits.

The proposed project area encompasses approximately 280 acres within the Fox Hills Neighborhood (see Figure 2-1, *Fox Hills Specific Plan Area*). The areas of the Fox Hills Neighborhood north of Slauson Avenue and west of Sepulveda Boulevard and Interstate 405 (I-405) are not part of the Specific Plan area; no changes are proposed for this area, and they would continue to be governed by the General Plan 2045. These areas of the Fox Hills Neighborhood were not included in the Specific Plan so that the Specific Plan boundaries would be major roadways such as Slauson Avenue, Sepulveda Boulevard, and West Centinela Avenue, or highways such as I-405, rather than parcels or local streets. The exception is the proposed project area's eastern boundary, which borders unincorporated residential parcels (see Figure 2-1).

The Specific Plan area is bounded by areas in the city limits and SOI to the north, unincorporated Los Angeles County to the east, and the City of Los Angeles to the south and west. The proposed project area is generally bordered by commercial, medium-density multi-family residential, light industrial, and cemetery uses to the north; low-density residential (Ladera Heights), commercial, and place of worship uses to the east; West Centinela Avenue, commercial uses, Centinela Creek Channel, and I-405 to the south; and Sepulveda Boulevard, State Route 90 (SR-90), commercial, and restaurant uses to the west.

2.2 EXISTING LAND USE CONDITIONS

The Fox Hills Specific Plan area consists of a mix of medium-density multi-family residential developments, commercial centers including Westfield Culver City, hotels, office parks, a bus transfer facility/transit center, the Hillside Memorial Cemetery and Mortuary, Fox Hills Parkette, and Fox Hills Park. Fox Hills Park serves as the neighborhood's primary open space and community gathering area. The Centinela Creek Channel crosses the southern border of the

Specific Plan area and is located to the northwest of West Centinela Avenue (see Figure 2-2, *Fox Hills Specific Plan Area - Aerial*). Figure 2-3, *General Plan Existing Land Use Map of Fox Hills (Adopted 2024)*, shows the existing General Plan land uses, and Figure 2-4, *Fox Hills Existing Zoning Map,* shows the existing zoning districts in the Specific Plan area.

2.3 PROJECT OBJECTIVES

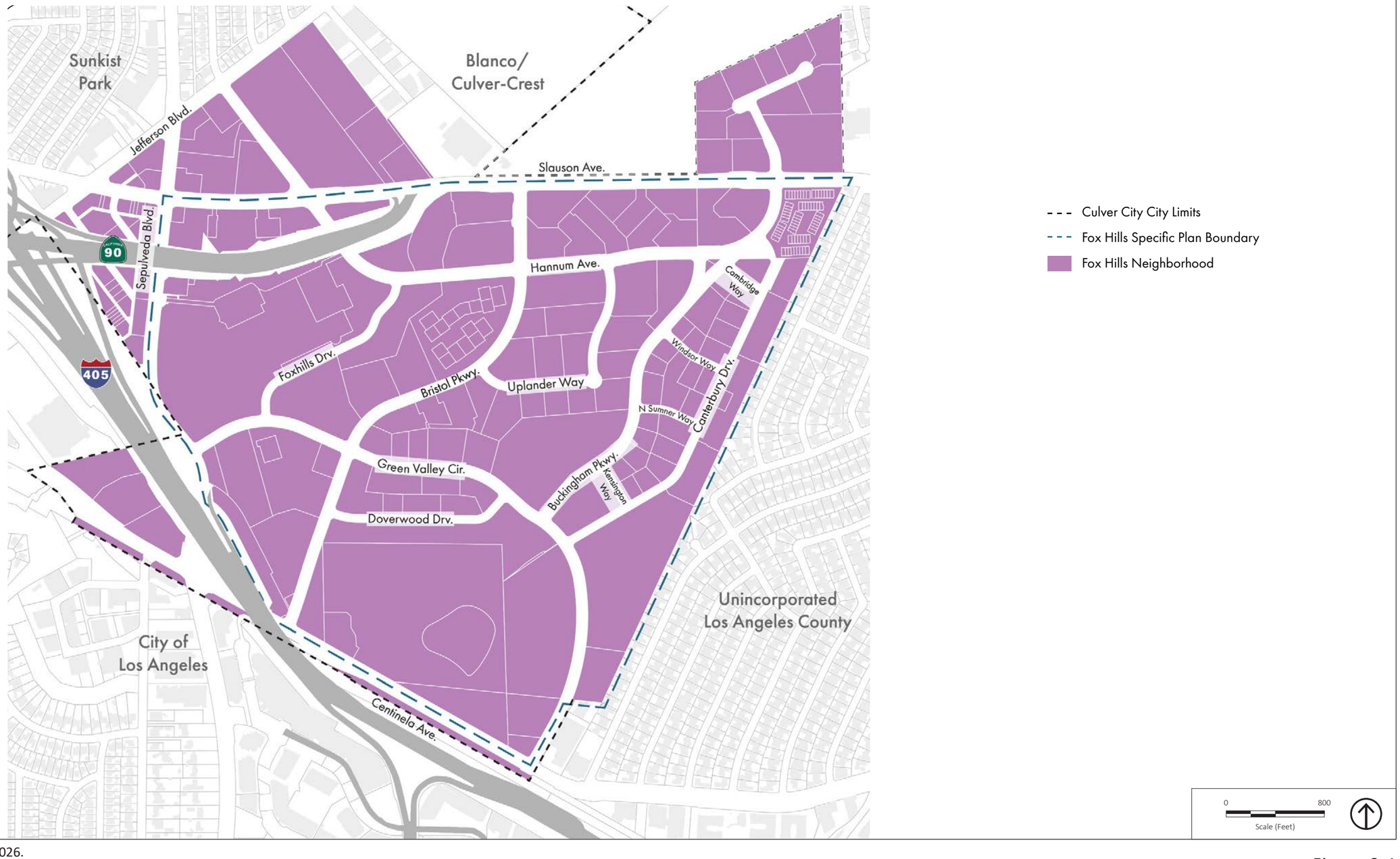
2.3.1 Adopted General Plan 2045 Purpose and Objectives

The General Plan 2045 was adopted by the City in September 2024 for the following purposes, as described in the Certified EIR.

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision.
- Establish long-range development policies that will guide City departments, as well as Planning Commission and City Council decision-making.
- Provide a basis for judging whether specific development proposals and public projects are in harmony with plan policies.
- Designate land uses in a way that meets future land needs based on the projected population and job growth.
- Allow City departments, other public agencies, and private developers to design projects that will minimize hazards.
- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance, subdivision regulations, comprehensive plans, and the Capital Improvement Program.

In addition, the following specific and objective benchmarks that guided the development of the General Plan 2045 (i.e., Guiding Principles) were included in the Certified EIR.

- Provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures.
- Advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations, including persons experiencing homelessness, the elderly, and persons with disabilities.



Source: studioneleven 2026.

Figure 2-1
Fox Hills Specific Plan Area

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Source: studioneleven 2026.

Figure 2-2
Fox HIlls Specific Plan Area – Aerial

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Source: studioneleven 2026.

Figure 2-3
General Plan Existing Land Use Map of Fox Hills (Adopted 2024)

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Source: studioneleven 2026.

Figure 2-4
Fox Hills Existing Zoning Map

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

2.3.2 Proposed Specific Plan Vision and Objectives

The purpose of the Fox Hills Specific Plan is to provide a coordinated planning and regulatory framework that:

- Provides strategies to improve walkability, bike ability, and transit access, including expansion of the Culver City Transit Center and future local shuttle connections.
- Enhances public spaces, streetscapes, and neighborhood amenities to support community well-being.

- Encourages a mix of uses and the development of community amenities and destinations to create a thriving neighborhood.
- Guides private and public investment that reinforces a cohesive and vibrant neighborhood identity.
- Provides development incentives for hotels.

2.4 DESCRIPTION OF THE PROPOSED PROJECT

Following the adoption of the General Plan 2045, portions of the Fox Hills Neighborhood were rezoned to allow mixed-use and higher densities. Significant changes were anticipated on the low-density suburban office park properties south of Hannum Avenue and at the Westfield Culver City, as identified in the Certified EIR. The proposed project would guide the previously approved transition from the existing lower density uses to mixed use and higher density uses identified in Figure 2-3, *General Plan Existing Land Use Map of Fox Hills (Adopted 2024),* which was adopted in addition to the General Plan 2045.

The Specific Plan establishes a framework to guide future growth and public improvements within the Specific Plan area. It provides updated zoning and policies for private development, standards for streetscapes and mobility as well as future City actions to support a more connected and livable mixed-use community while maintaining the area's established green character (see Section 2.4.2, *Proposed Specific Plan Updates*). The proposed project would refine existing zoning and policy documents applicable to the Fox Hills Specific Plan area to ensure consistency with the General Plan 2045 goals and policies. No specific projects are proposed at this time, and the proposed project would provide standards to guide for future development in the Specific Plan area, as applicable; this Addendum evaluates potential environmental effects associated with adoption of the Specific Plan only. Any future implementing projects would be reviewed to determine the appropriate level of CEQA review.

2.4.1 Relationship to the Adopted General Plan 2045

The proposed project establishes the regulatory tools needed to implement the General Plan 2045 goals and policies for the Fox Hills Neighborhood. The Specific Plan land use designations would be consistent with the existing General Plan 2045 designations evaluated in the Certified EIR and identified in Figure 2-4, *Fox Hills Existing Zoning Map*. The proposed project would not increase the land use densities allowed under General Plan 2045 but will provide a framework for these previously approved changes (see Figure 2-5, *Fox Hills Proposed Zoning Map*, in the Certified EIR). Based on Table 4.10-2, *General Plan 2045 Projections by Land Use,* of the Certified EIR, buildout of the General Plan 2045, citywide, would result in 12,700 net new residential units, 3,332,000 square feet of net new commercial space, and 364,800 square feet

of industrial space. The proposed project would allow an increase in the maximum building heights for future hotel developments, primarily in the central portion of the Specific Plan area, compared to the maximum heights analyzed in the Certified EIR (see Section 2.4.2, *Proposed Specific Plan Updates*). Although the increased hotel building heights may slightly increase the square footage of the hotel buildings, this change would not result in an increase in the overall commercial square footage analyzed in the Certified EIR. Therefore, the proposed project would not result in an increase in development allowed under the Certified EIR.

The Specific Plan includes five key strategies to meet the General Plan 2045 goals and policies pertaining to the Fox Hills Neighborhood and create a connected, green (open space), and livable mixed-use neighborhood. Table 2-1, *Fox Hills Specific Plan Strategies*, describes the proposed project's key strategies and the consistency of these strategies with adopted General Plan 2045 policies. No changes to the adopted General Plan 2045 policies are proposed.

Table 2-1 Fox Hills Specific Plan Strategies

Key Strategy	Applicable General Plan 2045 Policies
1. **Build a Connected Green Network**. Link new developments to Fox Hills Park, Transit Center and the mall through a new public accessway network that includes landscaping, greening and amenities. ▪ Break down existing large blocks ▪ Link new development to Fox Hills Park, the Transit Center, and the mall ▪ Integrate landscaping, trees, and green walkways into development and public spaces	**Policy LU-7.2**: ***Walkable Streets in Fox Hills***. Require new development to break up large blocks and prioritize pedestrian, bicycle, and emergency vehicle access with complete streets improvements. **Consistency:** The proposed project includes a potential public accessway network and potential complete streets improvements that would create walkable streets that would break up large blocks; this would improve the connectivity to open space areas, transit centers, and commercial land uses within the Specific Plan area.
	Policy LU-7.4: ***Park and Open Space***. Require new publicly accessible parks and open spaces, and complete streets connections to these spaces, to support business and residential communities. **Consistency:** The proposed project identities potential locations for pedestrian/bicycle paths connections to open space areas and public accessways. The public accessway network could add 3.33 acres of publicly accessible open space if implemented, which would support residential communities and businesses within the Specific Plan area.

Table 2-1 Fox Hills Specific Plan Strategies

Key Strategy	Applicable General Plan 2045 Policies
2. **Make it Easy and Safe to Get Around** Reduce single-occupancy vehicle use, improve street safety, expand access to transit and sustainable mobility options. ▪ Create streamlined standards for safe and complete streets ▪ Plan for expansion of the Transit Center and new neighborhood-scale mobility hubs ▪ Study policies and incentives for future developments to include shared public parking	**Policy LU-7.5**: **Surface Parking Reuse.** Develop new parking strategies to encourage mixed use development, replace surface parking, and develop new open space in Fox Hills. Facilitate redevelopment of surface parking areas by allowing transportation demand management, shared parking, and technological solutions that make parking more efficient to reduce parking needs. **Consistency:** The proposed project includes potential locations for mobility hubs, including a transit center that could consist of a park and ride, bus stop amenities, and secure bicycle parking that would reduce the demand for vehicle parking. Incentives could also be provided to future developments that incorporate shared parking.
	Policy LU-7.2: *Walkable Streets in Fox Hills*. See consistency discussion for Key Strategy 1, above. Also, the potential complete streets and public accessway network improvements would improve the walkability in the Specific Plan area and reduce the demand for parking.
3. Plan for More Neighborhood Amenities Strengthen daily life in Fox Hills through community-oriented spaces and public amenities ▪ Plan for a new Community Center for Fox Hills Park ▪ Incentivize publicly accessible amenities and recreational spaces on private properties ▪ Encourage active street on Bristol Parkway with possibilities for nodes of retail activation	**Policy LU-7.4**: ***Park and Open Space.*** **Consistency:** See the consistency discussion under Key Strategy 1. The proposed project includes a conceptual public accessway network (pathways) that could connect to Fox Hills Park. In addition, a new community center, which was broadly identified in the Certified EIR, could be developed at Fox Hills Park, consistent with the Culver City Parks Plan. The new community center is not currently proposed. The potential community center would be subject to a separate environmental review process at the time the development is proposed.

Table 2-1 Fox Hills Specific Plan Strategies

Key Strategy	Applicable General Plan 2045 Policies
4. Guide New Development to Preserve and Enhance Neighborhood Character ▪ Ensure new development complements existing scale and identity. ▪ Provide standards to create a walkable, human-scaled neighborhood ▪ Modulate development scale next to existing residential and the new public accessways. ▪ Create conditions for an active street along Bristol Parkway	**Policy LU-7.3**: **Fox Hills Main Streets.** See Key Strategy 3. **Consistency:** The proposed project would be consistent with proposed development standards for buildings that front onto the main street and provide sidewalk-oriented entries and facades. The proposed project would include development standards that ensure the scale of development adjacent to existing residential uses is consistent with these uses.
5. Strengthen Gateways and Identity Create distinctive gateways at key entrances to Fox Hills that signal arrival and express the neighborhood's character. Explore the potential for a primary 'gateway' on city-owned open space at Slauson and Hannum Identify opportunities for secondary 'gateway' elements along Slauson Ave and Centinela Ave	**Policy LU-7.4**: ***Park and Open Space.*** See Key Strategy 1. **Consistency:** The proposed project identified potential future locations for paseo and promenade connections to open space areas. Creating distinctive gateways on City-owned open space areas would improve accessibility to these areas.

2.4.2 Proposed Specific Plan

The proposed project establishes new Specific Plan zoning districts that would be consistent with the land use designations in the adopted General Plan 2045, and includes development standards that would regulate future projects in the Specific Plan area. The proposed project would not require changes to adopted General Plan 2045 land use designations shown on Figure 2-3, *General Plan Existing Land Use Map of Fox Hills (Adopted 2024)*. The proposed project provides key priorities and implementation tools, in compliance with General Plan 2045 policies, for future projects in the Fox Hills Neighborhood. While no specific development projects or improvements are proposed at this time, the proposed project would allow for the following future development and improvements.

- Targeted infill development and intensification of existing office park areas with mixed-use redevelopment, including high-density multi-family housing (as identified in General Plan 2045).
- Public facility improvements, including a new network of public accessways and complete streets that improve pedestrian and bicycle safety and connect to Fox Hills Park and the Culver City Transit Center.
- Mobility improvements such as enhancement/expansion of the Culver City Transit Center, future shuttle service connections, and shared parking strategies.

As described in Section 2.4.1, *Relationship to the Adopted General Plan 2045*, the proposed project would not include an increase in the land use densities identified in the Certified EIR or result in an increase of overall development allowed under General Plan 2045. The proposed Specific Plan would be implemented through a combination of updated zoning, design standards, development review procedures, and future City actions. The proposed changes to the zoning districts and development standards, proposed maximum building heights, potential streets and public accessway network, potential complete streets improvements, and potential mobility hub improvements are described in this section, respectively.

PROPOSED ZONING CHANGES

The proposed zoning districts of the Specific Plan would be consistent with the existing zoning district lot and density standards. Figure 2-5, *Fox Hills Proposed Zoning Map,* shows the proposed Specific Plan zoning districts. The existing Mixed Use Medium and Mixed Use High zoning districts would be changed to Fox Hills Mixed Use Medium and Fox Hills Mixed Use High zoning districts. This revision would not result in changes to the lot or density standards for these districts. However, revisions to the development standards are proposed to ensure future development is consistent with the Specific Plan vision and goals. Table 2-2, *Zoning Districts and Standards*, shows the lot and density standards for the proposed Specific Plan.

Table 2-2 Zoning Districts and Standards

Standards	RMD	RHD [1]	FH -MD [2]	FH-HD [2]
Maximum non-residential floor area ratio	N/A	N/A	3	4
Maximum residential density (units/acre)	50 du/acre	70 du/acre	65 du/acre	100 du/acre
Minimum residential density (units/acre)	20 du/acre	30 du/acre	30 du/acre	30 du/acre

Table 2-2 Zoning Districts and Standards

Standards	RMD	RHD [1]	FH -MD [2]	FH-HD [2]
Minimum lot area	5,000 square feet	20,000 square feet	20,000 square feet	20,000 square feet
Minimum lot width	50 feet	100 feet	100 feet	100 feet
Minimum lot depth	100 feet	100 feet	100 feet	100 feet

Notes: RMD = Medium Density Multiple-Family Residential

RHD = High Density Multiple-Family Residential

FH-MD = Fox Hills Mixed Use Medium

FH- HD = Fox Hills Mixed Use High

1. No change to RMD-RHD from existing zoning codes.

2. FH-MD and FH-HD retain same lot and density standards as MU-MD and MU-HD zones respectively in the existing zoning code, but would have form and development standards customized to the Fox Hills vision and goals.

PROPOSED MAXIMUM BUILDING HEIGHTS

The maximum building heights allowed for future development under the proposed project would be consistent with the height limitations allowed under the existing zoning. Figure 2-6a and b, *Fox Hills Proposed Height Regulation Maps*, shows the maximum building heights that would be allowed for future development. In addition, areas zoned as Fox Hills Mixed Use Medium and Fox Hills Mixed Use High would have an allowed maximum building height of 56 feet above grade, which is consistent with the height limitations under the existing zoning. Approximately 40 parcels in the central portion and two parcels in the northeastern portion of the Specific Plan area, in the Fox Hills Mixed Use High zoning district, would have a height restriction increased from the existing allowable 56 feet above grade to 120 feet above grade, limited only to hotel uses. The proposed project would allow for an increased building height for hotel uses in the Fox Hills Mixed Use High district by 64 feet (approximately 5 to 7 stories), compared to the existing height limitations in the Certified EIR. However, the proposed increase in height for hotel uses would not involve changes to the residential, commercial, or industrial maximum allowable uses, or otherwise change the anticipated maximum General Plan 2045 buildout scenario that is evaluated in the Certified EIR.

POTENTIAL PUBLIC ACCESSWAY NETWORK, COMPLETE STREETS, AND OPEN SPACE IMPROVEMENTS

The proposed project identifies key locations for future dedicated easements for public accessway (also referred to as paseo and promenade) network improvements. The improvements described are conceptual. No specific improvements are proposed at this time. The improvements could include a 30-foot-wide public accessway easement (pedestrian/bicycle paths) that would connect to Fox Hills Park and a 20-foot-wide easement that would connect to

a new public accessway. Potential easements and pedestrian connections are shown on Figure 2-7, *Fox Hills Public Accessway Network*. The Certified EIR found that the City operates 90.4 acres of parks and open space. The proposed new public accessway easements for pedestrian/bicycle paths, which would connect to parks and open space areas, would result in 3.33 acres of additional publicly accessible open space. In addition, the potential for a new community center, which was broadly discussed in the Certified EIR, continues to be referenced in the proposed Specific Plan as a future City action. The future community center would be subject to a separate environmental review process.

The proposed project also identifies dedicated easements for one-way protected and two-way protected pedestrian and bicycle lanes along Hannum Avenue, Bristol Parkway, Green Valley Circle, Bristol Parkway, and Buckingham Parkway (see Figure 2-8, *Fox Hills Complete Streets Improvements*). Conventional bicycle lanes are also shown on Hannum Avenue and Green Valley Circle. New traffic signals could be installed along Hannum Avenue and Green Valley Circle. In addition, new crosswalks could be added or existing crosswalks replaced throughout the proposed project area. The proposed project identifies potential locations of protected intersections, which could include features such as raised curbs, bollards, and pylons that separate bicyclists from motor vehicle traffic (FHWA 2023). See Figure 2-8, *Fox Hills Complete Streets Improvements*.

POTENTIAL TRANSIT IMPROVEMENTS/MOBILITY HUBS

Future locations for mobility hubs such as a regional activity and transit center, local trip generators/destinations, and neighborhood/community access facilities such as park and ride lots, micromobility stops, bus stop amenities, and secure parking facilities, have been identified at several key locations in the proposed Specific Plan area. The future location for a regional activity and transit center has been identified immediately south of Slauson Avenue and east of Sepulveda Boulevard. Neighborhood/community access facilities are prioritized on Green Valley Circle, and local trip generators/destinations are focused along Hannum Avenue. No specific transit or mobility improvements are currently proposed. The conceptual locations of potential transit improvements and mobility hubs in the proposed project area are shown on Figure 2-9, *Recommended Mobility Hubs Location*.



Source: studioneleven 2026.

Figure 2-5
Fox Hills Proposed Zoning Map

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Source: studioneleven 2026.

Figure 2-6a
Fox Hills Proposed Height Regulation Map – Option 1

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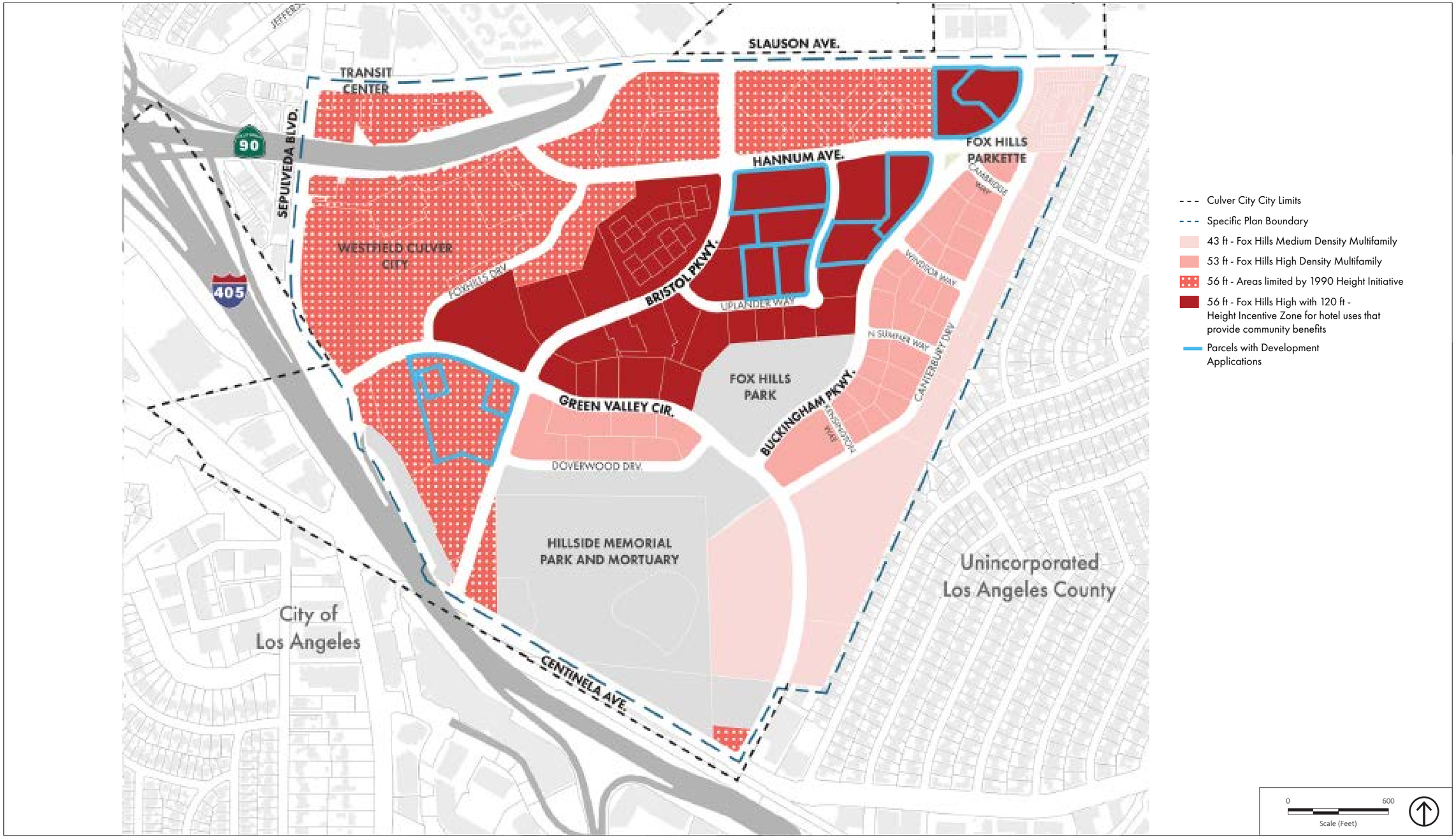

Source: studioneleven 2026.

Figure 2-6b
Fox Hills Proposed Height Regulation Map – Option 2

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Source: studioneleven 2026.

Figure 2-7
Fox Hills Public Accessway Network

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Source: studioneleven 2026.

Figure 2-8
Fox Hills Complete Streets Improvements

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Source: studioneleven 2026.

Figure 2-9
Recommended Mobility Hubs Location

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3. ENVIRONMENTAL ANALYSIS

This section summarizes the conclusions of the Certified EIR and then discusses that the proposed project would meet the conditions described in CEQA Guidelines Section 15164 for preparation of an Addendum. Applicable mitigation measures referenced are from the Certified EIR.

The following evaluation assesses the environmental impacts of the proposed project in relation to the analysis in the Certified EIR. Determinations are made as to whether the proposed project would result in new significant impacts or substantially more severe effects, which would trigger the need for a Subsequent or Supplemental EIR.

Each impact analyzed identifies a level of significance. Though criteria for determining significant impacts are unique to each issue area, the environmental analysis applies a uniform classification of the impacts based on the following definitions consistent with CEQA and the CEQA Guidelines.

- **No Impact (NI).** A designation of no impact is given when no changes in the environment would occur.
- **Less than Significant Impact (LTS).** A less than significant impact would cause no substantial adverse change in the environment.
- **Less than Significant Impact with Mitigation (LTS-M).** A less than significant impact with mitigation incorporated avoids substantial adverse impacts on the environment with adherence to identified mitigation measures. For those issue areas where the impact of the proposed project would be less than significant with the incorporation of the same mitigation measure(s) identified in the GP EIR, the impact is identified as LTS-M(GP). The number of the mitigation measure from the MMRP will be referenced and summarized in Chapter 4.
- **Significant and Unavoidable Impact (SU).** A significant unavoidable impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

Following the impact conclusion for the proposed project (the Fox Hills Specific Plan), this Addendum addresses the following questions:

- What is the Certified EIR impact conclusion?
- Does the proposed Specific Plan involve new significant impacts or substantially more severe impacts than those analyzed in the Certified EIR?

- Are there any new or changed circumstances involving new significant impacts or substantially more severe impacts than those analyzed in the Certified EIR?
- Is there any new information of substantial importance that was not and could not have been known at the time of certification of the Certified EIR that rises to the level of requiring new analysis or verification?
- Are any new mitigation measures required for the proposed project?

3.1 AESTHETICS

3.1.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR determined that the approved project would result in less than significant environmental impacts to aesthetics. The Certified EIR concluded that although there are long-range views and view corridors in the Culver City Planning Area, Baldwin Hills/Baldwin Hills Scenic Overlook and along certain streets, the approved project would not substantially impair scenic vistas because future development would be subject to and consistent with the General Plan 2045's goals and policies that protect scenic vistas as well as all applicable laws and standards; therefore, impacts were less than significant. The Certified EIR concluded that no potentially significant impacts related to substantially damaging scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic highway would occur with implementation of the approved project. The Certified EIR found that because the approved project would be consistent with the City's existing zoning requirements and development standards (such as height limits, setbacks, landscaping regulations, and screening of utilities and mechanical equipment), it would not conflict with regulations governing scenic quality in the urbanized setting and therefore would not substantially degrade visual character or scenic resources, resulting in a less than significant impact. Additionally, though future development could incrementally increase sources of light and glare, the Certified EIR determined that the anticipated changes would not rise to the level of a significant adverse effect on day or nighttime views when considered in the context of the existing urban environment and required compliance with applicable policies and standards, so light and glare impacts were also concluded to be less than significant.

3.1.2 Impacts Associated with the Proposed Project

The Specific Plan area is in a developed urbanized area, and no scenic vistas have been identified near or within the Specific Plan area. Development of the proposed project would occur within the Culver City Planning Area, which does not contain and is not surrounded by any scenic vistas that would be impacted by the implementation of the proposed project. Under the proposed project, future hotels could have a maximum height up to 120 feet above grade, compared to 56 feet assumed in the Certified EIR. Although the proposed project would result

in an increase of the maximum building height by 64 feet, the increase in height would not result in a more substantial impact on scenic vistas or visual character because the Specific Plan area is surrounded by urban development that blocks views. Impacts would be less than significant. Therefore, no new impacts would occur.

There are no designated or eligible state scenic highways in the Specific Plan area and no adopted or eligible state scenic highways in the Culver City Planning Area (Caltrans 2026). The proposed project would occur entirely within the Culver City Planning Area. Therefore, like the approved project, the proposed project would have no impact on scenic highways. Therefore, no new impacts would occur.

The proposed project is in an already developed area in an urbanized city and in the Fox Hills Neighborhood identified in the Certified EIR. The proposed project would guide future private development and public improvements. The updated zoning standards and mobility/street design policies emphasize appropriate building scale, landscaping, and preservation of the area's established green character, ensuring that the scenic quality of the area is not substantially degraded. The proposed project land use designations would be consistent with the General Plan 2045 designations evaluated in the Certified EIR. The proposed project would not increase the land use densities allowed under General Plan 2045 but is meant to be the guiding framework for these previously approved changes. Impacts would be less than significant. Therefore, no new impact would occur.

The proposed project's future developments would comply with existing and new zoning and design standards, including requirements for light control, shielded fixtures, and context-sensitive design, which would avoid introducing new sources of light or glare that would affect nighttime views beyond what was previously evaluated in the Certified EIR. Like the approved project, the proposed project would facilitate future development that could incrementally increase sources of light and glare; however, the anticipated changes would not rise to the level of a significant adverse effect on day or nighttime views when considered in the context of the existing urban environment and required compliance with applicable policies and standards. Impacts would be less than significant. Therefore, no new impact would occur.

No specific projects are proposed at this time. Any future implementing projects would be reviewed to determine the appropriate level of CEQA review. The proposed project land use designations would be consistent with General Plan 2045 designations evaluated in the Certified EIR. The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts, previously identified in the Certified EIR, with respect to aesthetics. Likewise, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
I. AESTHETICS. *Would the project:*						
a) Have a substantial adverse effect on a scenic vista?	**LTS**	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	**LTS**	LTS	No	No	No	No
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality						
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	**LTS**	LTS	No	No	No	No

3.1.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to aesthetics and no mitigation is required for the proposed project.

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Summary of Agricultural and Forestry Resources Impacts Identified in the Certified EIR

The Certified EIR determined that no potentially significant impacts due to the implementation of the approved project related to agriculture and forestry resources would occur. The Culver City Planning Area is urbanized and does not contain agricultural uses or related operations, and no areas are designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No portion of the Culver City Planning Area is zoned for agriculture, and no parcels within the Culver City Planning Area are enrolled under a Williamson Act contract. Additionally, no forest land exists within the Culver City Planning Area, and therefore no impact would occur.

3.2.2 Impacts Associated with the Proposed Project

The Certified EIR identified no impacts associated with the conversion of farmland to non-agricultural use. The Certified EIR identified that the Culver City Planning Area is not utilized for agricultural uses, and no farmland exists within the proposed project area or in the immediate vicinity. The proposed project occurs within the boundaries of the existing Fox Hills Neighborhood identified in the Certified EIR. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the proposed project area is designated Urban and Built-Up Land and is not near or within any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2025a). Thus, implementation of the proposed project would not convert agricultural land to a non-agricultural use. Therefore, similar to the approved project, implementation of the proposed project would not result in any impacts to agricultural resources. Therefore, no new impact would occur.

The proposed project area is within the currently developed Fox Hills Neighborhood, which is an urbanized area of the city. Land uses within or near the proposed project area are not zoned for agricultural uses and are not subject to a Williamson Act contract (DOC 2025b). Thus, implementation of the proposed project would not conflict with an existing Williamson Act contract and no impact would occur. Therefore, no new impact would occur.

The proposed project is fully within the boundaries of the Culver City Planning Area, specifically within the Fox Hills Neighborhood, and provides updated zoning and policies for private development, standards for streetscapes and mobility, as well as future City actions to support a more connected, and livable mixed-use community while maintaining the area's established green character. According to the California Department of Fish and Wildlife (CDFW), the proposed project area does not contain forest lands or timberlands, and no such uses exist near or within the proposed project area (CDFW 2015). Thus, implementation of the proposed project would not conflict with such zoning or result in the loss of forest land and no impact would occur. Therefore, no new impact would occur.

As described above, no agricultural uses (including farmland and forestland) exist in the proposed project area or within the vicinity. Therefore, development of the proposed project would not result in the conversion of farmland to a non-agricultural use and would not result in the conversion of forest land to a non-forest use and no impact would occur. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts, previously identified in the Certified EIR, with respect to agricultural resources. Likewise, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required. Therefore, no new impact would occur.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
II. AGRICULTURAL RESOURCES *Would the project:*						
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	**NI**	NI	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	**NI**	NI	No	No	No	No
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)),	**NI**	NI	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?						
d) Result in the loss of forest land or conversion of forest land to non-forest use?	**NI**	NI	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	**NI**	NI	No	No	No	No

3.2.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to agricultural and forestry resources and no mitigation is required for the proposed project.

3.3 AIR QUALITY

3.3.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that the City is within the South Coast Air Basin (SoCAB) and is subject to the South Coast Air Quality Management District (SCAQMD) rules and regulations, as described by the Certified EIR. The Certified EIR identified that the applicable AQMP for the SoCAB (including the city) is the 2022 Air Quality Management Plan adopted by the SCAQMD in December 2022. The Certified EIR found that the SoCAB is designated a nonattainment area (i.e., an area that does not meet the ambient air quality standards) for ozone (O_3), fine inhalable particulate matter ($PM_{2.5}$), and coarse inhalable particulate matter (PM_{10}) under the California Ambient Air Quality Standards (CAAQS), and a nonattainment area for O_3, $PM_{2.5}$, and lead (Los Angeles County only) under the National Ambient Air Quality Standards(NAAQS).

The Certified EIR concluded that future construction activities under General Plan 2045 and Zoning Code Update would be consistent with the AQMP under control strategies by implementing the California Air Resources Board's (CARB's) requirements to reduce on-road and off-road diesel equipment, and with SCAQMD's regulations to reduce fugitive dust emissions and volatile organic compounds (VOC) emissions from architectural coatings. Therefore, it was concluded that future construction under the General Plan 2045 and Zoning Code update would not conflict with an applicable air quality plan. The Certified EIR also found that the General Plan 2045 and Zoning Code Update would be consistent with AQMP land use and transportation strategies to reduce VMT and resulting regional mobile source emissions. However, the Certified EIR concluded that the projected population and job increase from the buildout of the General Plan 2045 and Zoning Code Update would exceed Southern California Association of Governments (SCAG) growth forecasts for the city. Accordingly, the Certified EIR determined that operational impacts related to conflict with an applicable air quality plan would be significant.

Additionally, the Certified EIR determined that future development projects that would exceed SCAQMD significance thresholds for criteria pollutant emissions, would be required to implement Mitigation Measure (MM) AQ-1 through MM AQ-5. MM AQ-1 requires project applicants to meet the US Environmental Protection Agency (EPA) and/or CARB or better Off-Road New Diesel Engine Emission Standards for construction equipment. MM AQ-2 requires

construction contractors to use low-VOC and/or super-compliant VOC architectural coatings and industrial maintenance coatings to reduce construction criteria pollutant emissions.

MM AQ-3 requires future development projects to install EnergyStar-certified appliances or appliances of equivalent energy efficiency. MM AQ-4 and MM AQ-5 require multi-family units and non-residential developments to include electric vehicle charging spaces and preferential parking consistent with the California Green Building Standards Code (CALGreen) (or its successor code). The Certified EIR concluded that even with implementation of MM AQ-1 through MM AQ-5, the growth projections under the General Plan 2045 and Zoning Code Update would exceed the current SCAG growth forecasts for Culver City; therefore, operational impacts related to conflict with an applicable air quality plan and criteria air pollutant emissions would remain significant and unavoidable.

The Certified EIR found that construction equipment exhaust combined with fugitive particulate matter emissions from future development projects has the potential to expose sensitive receptors to substantial concentrations of toxic air contaminants (TAC) and result in a potentially significant impact. The implementation of MM AQ-1, MM AQ-2, MM AQ-6**,** and MM AQ-7 would be required. Mitigation Measure MM AQ-6 requires project applicants to submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the city and incorporate mitigation measures to reduce air pollutant emissions. Mitigation Measure MM AQ-7 requires project applicants to submit to the City a construction-related air quality study that evaluates health risks for future development projects within one-quarter mile of sensitive land uses. However, the Certified EIR determined that even with the implementation of mitigation measures and General Plan 2045 policies, localized and TAC emissions from construction of future development projects could result in an exceedance of SCAQMD thresholds at sensitive receptor land uses. The impacts related to potential localized emissions at sensitive receptors were considered significant and unavoidable.

The Certified EIR analysis in Appendix A, Attachment B, *Explanation of Checklist Determinations, Section III, Air Quality*, found that future development projects allowed under the General Plan 2045 and Zoning Code Update would result in a less than significant impact with respect to odor emissions as they would comply with SCAQMD Rule 1113, Architectural Coatings; CARB Air Toxics Control Measure, which would minimize odors from the combustion of diesel fuel; and SCAQMD Rule 402, Nuisance, which prohibits the emissions of nuisance air contaminants or odorous compounds.

The Certified EIR determined there would be a less than significant cumulative impact pertaining to conflict with an air quality plan when combined with other plans in the region. In addition, the Certified EIR found that construction and operational emissions from future development projects could exceed the SCAQMD significance thresholds. The cumulative impact was considered significant and unavoidable.

3.3.2 Impacts Associated with the Proposed Project

The proposed project falls within the boundaries of the Fox Hills Neighborhood and is consistent with the General Plan 2045 land use designations analyzed in the Certified EIR, as described in Chapter 2, *Project Description*. The proposed project would not increase the land use densities allowed under General Plan 2045 but is meant to be the guiding framework for these previously approved changes. Based on Table 4.10-2, General Plan 2045 Projections by Land Use, of the Certified EIR, buildout of the General Plan 2045, citywide, would result in 12,700 net new residential units, 3,332,000 square feet of net new commercial space, and 364,800 square feet of industrial space. Therefore, the proposed project would not result in an increase in development allowed under General Plan 2045.

The proposed project would not involve changes in land use, densities, or development assumed for the General Plan 2045 (including the Fox Hills Neighborhood) and, like the approved project, no specific development projects are proposed at this time. The construction of future development projects under the proposed project are expected to be of a similar scale and intensity as analyzed in the Certified EIR. Consistent with the conclusions of the Certified EIR, future development projects under the proposed project would be required to comply with CARB requirements to reduce short-term emissions from on-road and off-road diesel equipment (CARB 2026) and SCAQMD's regulations to reduce fugitive dust and VOC emissions from architectural coatings (SCAQMD 1976, 2016). Therefore, future construction activities allowed under the proposed project are expected to be consistent with the AQMP control strategies intended to reduce construction emissions (SCAQMD 2022). In addition, the proposed project would not result in an increase in construction jobs beyond what was assumed in the Certified EIR; therefore, the employment generated by future construction activities under the proposed project would not conflict with the long-term employment or population projections in the AQMP (SCAQMD 2022).

The proposed project includes key strategies that are consistent with the AQMP's applicable control strategies and vision, which include expanding mobility choices by locating housing, jobs and transit closer together; improving transit and complete streets; supporting zero emission vehicles and expanding electric vehicle charging stations; and supporting Transportation Demand Management (TDM) programs. The proposed project includes strategies to link new developments to the Culver City Transit Center and the mall through a new public accessway network; to plan for expansion of the Transit Center and new neighborhood-scale mobility hubs within the proposed project area; to create streamlined standards for safe and complete streets; and to provide standards to create a walkable, human-scaled neighborhood. The proposed project would allow for medium- to high-density multi-family and mixed-use developments near transit and public accessway and complete streets networks, which would improve the walkability and access to transit. The proposed project's key strategies would be required to comply with the adopted General Plan 2045 Policy M-5.4, which require future employers and developments to effectively reduce the number of single-occupancy vehicle trips

through the implementation of a TDM program. Accordingly, the proposed project is consistent with the AQMP's control strategies related to the operations of future development project.

There were no growth forecasts projected for the Fox Hills Neighborhood specifically; however, the General Plan 2045 and Zoning Code Update forecasts assumed future development in the Fox Hills Neighborhood (and proposed project area). Future development allowed under the proposed project would contribute to the previously approved exceedance in growth projections for the City; therefore, the operation of future development projects under the proposed project would contribute to a significant and unavoidable impact with respect to conflict with an air quality plan (even with the implementation of MM AQ-1 through MM AQ-5), consistent with the Certified EIR conclusions. Therefore, no new impact would occur.

Consistent with the conclusions in the Certified EIR for the General Plan 2045 and Zoning Code Update buildout, it is possible some future development projects under the Specific Plan could be large in scale and/or intensity and could require significant heavy-duty construction equipment. Therefore, construction period emissions for future development projects under the Specific Plan could exceed SCAQMD significance thresholds. As with future development under the General Plan 2045 and Zoning Code Update, future development projects under the Specific Plan would be required to implement MM AQ-1 and MM AQ-2 to reduce construction criteria pollutant emissions.

Since the proposed project is within the scope of the General Plan 2045 development assumptions, the operational emissions from future development of the Fox Hills Neighborhood (and the proposed project area) were accounted for in the criteria pollutant emissions analysis described in Section 4.2, Air Quality, of the Certified EIR. As with future development projects under the General Plan 2045 and Zoning Code Update, future development projects under the Specific Plan could exceed the SCAQMD significance thresholds for VOC emissions. Future development projects allowed under the Specific Plan would implement MM AQ-3 through MM AQ-5 to reduce operational criteria pollutant emissions.

Similar to the conclusions of the Certified EIR, implementation of MM AQ-1 through MM AQ-5 and compliance with applicable General Plan 2045 goals and policies, applicable AQMP control measures, and the key strategies of the Specific Plan would serve to reduce construction and operational criteria pollutant emissions (e.g., by improving the walkability of the area and reducing the use of single-occupancy vehicles). However, Specific Plan buildout would result in a significant and unavoidable impact with respect to a cumulatively considerable net increase of criteria pollutant emissions for which the region is non-attainment. The proposed project would not result in an exceedance of air pollutant emissions analyzed in the Certified EIR. Therefore, no new impact would occur.

While no specific development projects are proposed at this time, construction equipment exhaust combined with fugitive particulate matter emissions from future development projects

under the Specific Plan has the potential to expose sensitive receptors to substantial air pollutants. As with future development projects under the General Plan, future projects under the Specific Plan would implement MM AQ-1, MM AQ-2, MM AQ-6, and MM AQ-7 to reduce the potential impacts of TACs on nearby sensitive receptors. Given the potential scale or intensity of development, TACs at sensitive land use receptors could exceed SCAQMD significance thresholds even with mitigation. Therefore, consistent with the General Plan, TAC and localized emissions from future development projects under the Specific Plan could result in a significant unavoidable impact on sensitive receptors. However, no new impact would occur.

While no specific development projects are proposed at this time, future development projects under the Specific Plan would comply with SCAQMD Rules and CARB ATCMs, which would reduce the emissions of nuisance air contaminants and odorous compounds during operation and construction. Therefore, future development projects under the Specific Plan would result in a less than significant impact with respect to odor emissions adversely affecting a substantial number of people. No new impact would occur.

Similar to the conclusions in the Certified EIR, given the Specific Plan is within the scope of General Plan 2045, future development allowed under the Specific Plan would not conflict with cumulative growth projections and there would be a less than significant cumulative impact pertaining to a conflict with an air quality plan, when considering future development under other General Plans or Specific Plans in the region. In addition, construction and operational emissions from future development projects under the Specific Plan would contribute to the exceedance of SCAQMD significance thresholds, and therefore could have a cumulatively considerable contribution to significant regional air quality impacts identified in the Certified EIR. However, no new impact would occur.

Accordingly, the proposed project would not result in new significant impacts or a substantial increase in the severity of significant impacts than previously identified in the Certified EIR with respect to air quality. Similarly, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
III. AIR Quality *Would the project:*						
a) Conflict with or obstruct implementation of the applicable air quality plan?	SU	SU	No	No	No	No
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?	SU	SU	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	SU	SU	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	LTS (IS)	No	No	No	No

3.3.3 Adopted Mitigation Measures Applicable to the Proposed Project

Future development projects facilitated by the proposed project would be required to implement and adhere to the following mitigation measures in the Certified EIR, as applicable. No revisions to these mitigation measures are required.

MM AQ-1: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of NO_X, CO, PM_{10} and/or $PM_{2.5}$ shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District

(SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super-Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.

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

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

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

MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these

features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).

- Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).

MM AQ-6: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.

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

3.4 BIOLOGICAL RESOURCES

3.4.1 Summary of Impacts Identified in the Approved Project

The Certified EIR determined that special-status species have the potential to occur in the planning area and that construction and operation facilitated by the approved project would result in potentially significant impacts. The Certified EIR identified Mitigation Measure BIO-1 that would require applicants of future development projects within or adjacent to natural plant or wildlife habitat to provide a complete assessment and impact analysis to minimize impacts to special status species; and MM BIO-2, which ensures future construction activities take place outside the nesting season and if that is not feasible, a nesting bird and raptor survey must be completed to ensure impacts remain less than significant. With implementation of MM BIO-1 and MM BIO-2, potential significant impacts related to special-status species and their habitats would be reduced to a less-than-significant level. The Certified EIR determined that due to the lack of any sensitive natural communities, including riparian habitat and wetlands, in the Culver City Planning Area, the approved project would have no effect on these resources. Additionally, the approved project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant.

3.4.2 Impacts Associated with the Proposed Project

As discussed in the Certified EIR, special-status species have the potential to occur within the Culver City Planning Area. Future development facilitated by the proposed project would implement MM BIO-1 and MM BIO-2 to ensure that impacts to special status species would be reduced to a less than significant level. The proposed project area would be within the Culver City Planning Area analyzed in the Certified EIR. The proposed project area and surrounding area consist of developed land and ornamental landscaping. Therefore, as with the conclusions for the General Plan 2045 and Zoning Code Update, the proposed project would not affect any federal- or State-listed plant or animal species. Therefore, no new impact would occur.

Given that the Certified EIR determined that there is a lack of sensitive natural communities, including lack of riparian habitat, within the Culver City Planning Area, the proposed project would have no effect on these resources since it is within the Culver City Planning Area analyzed in the Certified EIR. Therefore, as with the General Plan 2045 and Zoning Code Update, the proposed project would result in no impact on riparian habitat or other sensitive natural communities. No new impact would occur.

The Certified EIR identified a less than significant impact on protected wetlands with respect to the planned Ballona Creek Revitalization Project, which could involve disturbance of the concrete-lined channel or the channel banks. Ballona Creek is outside of the proposed project

area, and future development allowed under the proposed project would not include improvements to Ballona Creek. The proposed Specific Plan area is developed and urbanized. The segment of the Centinela Creek Channel in the southwestern area of the proposed project area would be designated Open Space, and no future development would require direct removal or filling of the creek. Future development projects allowed under the Specific Plan would comply with construction and post-construction best management practices (BMP) that would reduce the volume of stormwater runoff and amount of pollutants directed to the city's creeks (see Section 3.10, *Hydrology and Water Quality*). Accordingly, as with the approved project, the proposed project would have a less than significant impact on protected wetlands. Therefore, no new significant impact would occur.

The Specific Plan area is in an urban setting, and the Specific Plan area does not contain any natural habitat. As stated in the Certified EIR, the Culver City Planning Area, including the Specific Plan area, is not within or part of a wildlife corridor. However, as discussed in the Certified EIR, nesting birds and nesting bird habitat have been recorded in the Culver City Planning Area. Implementation of MM BIO-2 would ensure that impacts to nesting birds would be reduced to a less than significant level on a project-by-project basis. MM BIO-2 would require future development to implement procedures and processes related to protecting nesting birds and their associated habitat, such as pre-construction surveys and protection and/or avoidance of nesting birds and their associated habitats. Implementation of this mitigation measure would ensure that impacts to nesting birds during construction of future development would be less than significant. The proposed project would occur within the impact boundaries identified for the approved project. As with the conclusions for the General Plan 2045 and Zoning Code Update, the proposed project would not pose substantial barriers or other impediments to wildlife movement or impede the use of wildlife nursery sites and, similar to the approved project, impacts would be less than significant and no new impacts would occur.

The proposed project does not include the removal of any trees that are protected under the Culver City Tree Removal Ordinance, Los Angeles County Oak Tree Protection Ordinance, or the Los Angeles County Oak Woodlands Conservation Management Plan. Future development facilitated under the proposed project would be subject to the City's and County's tree preservation ordinances and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. Therefore, like the approved project, no impact would occur, and no new impact would occur.

The Specific Plan area is not in the plan area of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or State habitat conservation plan (CDFW 2025). Therefore, no impact to habitat conservation plans would occur from implementation of the proposed project. No new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of significant impacts, than previously identified in the Certified EIR, with respect to biological resources. Similarly, there is no new information of substantial importance requiring

new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
IV. BIOLOGICAL RESOURCES *Would the project*						
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**LTS/M**	LTS/M	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of	**NI**	NI	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
Fish and Wildlife or U.S. Fish and Wildlife Service?						
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	**LTS**	LTS	No	No	No	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	**LTS/M**	LTS/M	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**NI**	NI	No	No	No	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	**NI**	NI	No	No	No	No

3.4.3 Adopted Mitigation Measures Applicable to the Proposed Project

Future development projects facilitated by the proposed project would be required to implement and adhere to the following mitigation measures in the Certified EIR, as applicable. No revisions to these mitigation measures are required.

Mitigation Measure BIO-1: Baseline Biological Assessment. The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:

a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, Section 15125(c)].

b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018)

c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions

d) A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, Sections 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, Section 15380); and,

e) Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance.

f) Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes

g) voidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented.

Mitigation Measure BIO-2: Nesting Bird Surveys. Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

3.5 CULTURAL RESOURCES

3.5.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR determined that implementation of the General Plan 2045 and Zoning Code Update could cause a substantial adverse change in the significance of historical resources due to potential demolition, alteration, or incompatible development. The Certified EIR determined

that these impacts would be significant and unavoidable, even with the implementation of mitigation measures (including MM CUL-1 which ensures that historical resources are properly identified and evaluated), due to the long-term, citywide nature of the plan. Impacts to archaeological resources and tribal cultural resources could occur as a result of ground-disturbing activities; however, MM CUL-2 requiring project applicants to obtain an archaeologist to prepare an archaeological resources assessment, would reduce impacts to archaeological resources to less than significant levels. The Certified EIR found that compliance with the State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e), which require applicants or contractors to contact the County Coroner in the event there is an inadvertent discovery of human remains, would reduce impacts to human remains to a less than significant level. Accordingly, while the General Plan 2045 includes policies and mitigation measures to minimize effects on cultural resources, impacts to historical resources would remain significant and unavoidable.

3.5.2 Impacts Associated with the Proposed Project

The Certified EIR determined that a total of 204 known historic resources have been previously identified within the Culver City Planning Area. New development and redevelopment facilitated under the proposed project could result in a substantial adverse change in the significance of a historical resource if a future development facilitated by the proposed project resulted in the physical demolition, destruction, relocation, or alteration of the resource such that it no longer retained its historical significance. New construction through infill development on vacant property could also result in a substantial adverse change in the significance of a historical resource through alteration of the resource's immediate surroundings. However, no specific projects are proposed at this time, and the proposed project would provide standards to guide for future development in the proposed project area, as applicable.

Future development facilitated by the proposed project would be required implement MM CUL-1 to ensure that historical resources are properly identified and that impacts on any identified historical resources are reduced. With implementation of this mitigation measure, no new impacts would occur, however, impacts would continue to remain significant and unavoidable. Therefore, no new impact would occur.

The Certified EIR identified a significant but mitigable impact associated with the disturbance of areas considered to be archaeologically sensitive. The Certified EIR identified 18 known archaeological resources within the City. The proposed project area is fully developed and urbanized and has experienced surface disturbances in the past. Ground-disturbing activities associated with future development facilitated by the proposed project would occur within the same planning area analyzed in the Certified EIR. Like the approved project, the proposed project would implement MM CUL-2. This mitigation measure requires procedures to be followed in the event of an accidental discovery of archaeological resources during construction

to ensure resources are avoided to the extent possible and handled appropriately. Therefore, with implementation of this mitigation measure, no new impacts would occur, and impacts would remain significant but mitigable.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
V. CULTIUAL RESOURCES *Would the project*						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	**SU**	SU	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	LTS/M	LTS/M	No	No	No	No
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	LTS	LTS	No	No	No	No

3.5.3 Adopted Mitigation Measures Applicable to the Proposed Project

Future development projects facilitated by the proposed project would be required to implement and adhere to the following mitigation measures in the Certified EIR, as applicable. No revisions to these mitigation measures are required.

Mitigation Measure CUL-1. Prior to development of any project within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified historic resources will be assessed for the project's potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be evaluated for its potential significance under national and state criteria prior to the City's approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.

Mitigation Measure CUL-2: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction

monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.

3.6 ENERGY

3.6.1 Impacts Associated with the Certified EIR

The Certified EIR found that future construction could consume electricity, petroleum-based fuels associated with the use of off-road construction vehicles and equipment, and a limited amount of natural gas. The Certified EIR stated that construction equipment and vehicles would be required to comply with anti-idling regulations to reduce fuel combustion and energy consumption in accordance with Section 2485 in Title 13 of the California Code of Regulations (CCR), and fuel requirements in compliance with Section 93115 in Title 17 of the CCR. Accordingly, the Certified EIR concluded that construction of future development projects would comply with regulatory measures to reduce impacts related to the inefficient, wasteful, and unnecessary consumption of energy, to a less than significant level.

The Certified EIR determined future development project operations under the General Plan 2045 would result in a net increase in electricity, natural gas, and gasoline and diesel fuel consumption. The Certified EIR found that future development projects under the General Plan 2045 and Zoning Code Update would comply with the applicable provisions of the California Building Standards Code (CBC), the Energy Code (California Code of Regulations (CCR), Title 24, Part 6), and the CALGreen Code (CCR, Title 24, Part 11), which promote energy efficiency designs and the use of renewable energy. The Certified EIR found that the General Plan 2045 allows land uses such as high-density residential uses at infill locations near public transit and multi-modal circulation, which would reduce vehicle trips and the reliance of fuel for transportation. Accordingly, the Certified EIR concluded that future development projects would comply with applicable regulations and General Plan 2045 goals and policies to reduce impacts related to the inefficient, wasteful, and unnecessary consumption of energy, to a less than significant level.

In addition, the Certified EIR found that future development under the General Plan 2045 and Zoning Code Update would support statewide efforts, such as the SCAG 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) land use and transportation strategies intended to reduce VMT and resulting fuel consumption (SCAG 2020), to improve transportation energy efficiency and reduce transportation energy consumption through relevant goals and policies such as the General Plan 2045 Land Use and Community Design Element and Mobility Element. The Certified EIR also concluded that future development projects would comply with General Plan goals and policies in the Greenhouse Gas Reduction Element, Community Design Element, Infrastructure Element, Conservation Element, and Safety

Element, which encourage the efficient use of energy resources, which support the CBC and CALGreen requirements. The Certified EIR concluded that future development allowed by the General Plan and Zoning Code Update would not conflict with or obstruct a state or local plan for renewable energy and that the impact would be less than significant.

The Certified EIR concluded that all cumulative development projects and future development allowed under the General Plan 2045 and Zoning Code Update would be required to comply with CALGreen and CCR Title 24 energy efficiency requirements and other regulations and demonstrate consistency with federal and State fuel efficiency goals and incorporate, if applicable, any mitigation measures. The Certified EIR concluded that implementation of the General Plan 2045 and Zoning Code Update would result in a less than cumulatively considerable contribution to cumulative energy impact related to electricity, natural gas, and transportation energy.

3.6.2 Impacts Associated with the Proposed Project

The proposed project is within the scope of the General Plan 2045 and Zoning Code Update and future development under the Specific Plan was accounted for in the Certified EIR. Future development projects would comply with CCR Titles 13 and 17 and CARB regulations to reduce fuel combustion and energy consumption and limit idling of off-road vehicles. Given the proposed project is consistent with the General Plan 2045 development assumptions for the Fox Hills Neighborhood, including the proposed project area, the proposed project would not cause the net increase in electricity, natural gas, and fuel consumption (for transportation) to exceed what was estimated in the Certified EIR. Future development projects would be required to adhere to the applicable provisions of the CBC, Energy Code, and CALGreen Code, which promote energy efficiency designs and the use of renewable energy. Consistent with SCAG RTP/SCS land use and transportation strategies intended to reduce VMT and resulting fuel consumption, the proposed project allows for medium- to high-density mixed use and residential development near mobility hubs and the Culver City Transit Center.

The proposed project would also allow for complete streets improvements and public accessway network improvements to create walkable streets, consistent with General Plan 2045 Policy LU-7.2. Future development projects under the Specific Plan would also be consistent with General Plan 2045 goals and programs, such as Goal LU-1 and associated policies, which encourage high-densities near transit and mobility hubs at transit stations. Consistent with the conclusions in the Certified EIR, future development projects would not result in the inefficient, wasteful, and unnecessary consumption of electricity, natural gas, or fuel and would not conflict with or obstruct a State or local plan for renewable energy. Consistent with the conclusions of the Certified EIR, implementation of the proposed project would result in a less than cumulatively considerable contribution to a cumulative energy impact related to electricity, natural gas, or transportation energy.

The proposed project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts identified in the Certified EIR related to energy. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
VI. ENERGY *Would the project*						
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	**LTS**	LTS	No	No	No	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	**LTS**	LTS	No	No	No	No

3.6.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to energy, and no mitigation is required for the proposed project.

3.7 Geology and Soils

3.7.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR determined that the City is located in a seismically active region where strong ground shaking would be expected during the life of the General Plan 2045. However, compliance with existing state and local regulations, including the California Building Code, Seismic Hazards Mapping Act, and site-specific geotechnical investigations, would reduce potential impacts related to seismic hazards, unstable soils, and erosion to less-than-significant levels. The Certified EIR concluded that no surface fault rupture hazards are present in the City and that implementation of standard engineering practices and regulatory requirements would adequately address geology and soils impacts. Therefore, impacts related to geology and soils would be less than significant with adherence to applicable regulations and standard conditions of approval. Additionally, the Certified EIR identified potentially significant impacts related to paleontological resources and concluded that implementation of Mitigation Measure GEO-1, which requires future projects to complete a site-specific paleontological resources assessment, would reduce these impacts to a less than significant level.

3.7.2 Impacts Associated with the Proposed Project

The proposed project area is located within the boundaries of the Culver City Planning Area. Consistent with the assumptions in the Certified EIR, future development allowed under the proposed project would likely include earthwork activities, such as grading, excavation, stockpiling, and paving, which could expose soils to the effects of erosion or loss of topsoil. Once disturbed, either through removal of vegetation, asphalt, or an entire structure, stockpiled soils can be exposed to the effects of wind and water if not managed properly. Construction activities that disturb one or more acre of land surface are subject to the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit compliance includes implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. A SWPPP must also describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion best management practices (BMP), maintenance

responsibilities, and non-stormwater management controls. Inspection of construction sites before and after a storm is also required to identify stormwater discharge from construction activity and to identify and implement erosion controls where necessary. The BMPs implemented by a site-specific SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially reduced or eliminated. Therefore, like the approved project, impacts related to soil erosion and topsoil loss would be considered less than significant. Therefore, no new impact would occur.

The Certified EIR determined that the Newport-Inglewood Fault and the corresponding Alquist-Priolo Earthquake Fault Zones run through the northeastern part of the General Plan 2045 planning area. However, the proposed project area is not within an Alquist-Priolo Earthquake Fault Zone (DOC 2026a, 2026b). There are no other known faults that traverse the proposed project area that have the potential to result in surface fault rupture. Like all areas in Southern California, the proposed project area could be subject to strong ground shaking as a result of an earthquake. Potential effects to future development projects facilitated by the proposed project from ground shaking would be reduced through proper engineering design and conformance with current City, County, and State seismic building and development code requirements. In addition, future development projects would be required to comply with the General Plan 2045 Goal S-4 and associated policies that focus on addressing seismic hazards. Furthermore, the City Building and Safety Division would review future development projects on an individual basis to ensure compliance with all applicable engineering and environmental requirements prior to issuance of a building permit, which would further minimize the risk of structural failure due to strong ground shaking. Therefore, like the approved project, impacts related to strong seismic ground shaking would be considered less than significant. Therefore, no new impact would occur.

The Certified EIR identified the majority of the Culver City Planning Area to be located within a liquefaction hazard, including a portion of the proposed project area. As such, future development under the proposed project could potentially be exposed to the effects of liquefaction, subsidence, and lateral spreading from local and regional earthquakes. All future development facilitated by the proposed project would be required to be designed, engineered, and constructed in accordance with the requirements and standards of the California Building Code (CBC), Culver City Municipal Code (CCMC), and Los Angeles County Municipal Code (LACMC), which require that foundations and other structural support features be designed to resist or absorb damaging forces from strong ground shaking, liquefaction, and subsidence. Moreover, in accordance with the CBC, LACMC, and CCMC, for all proposed future development within an identified liquefaction area, a site-specific geotechnical investigation and report that includes design and engineering requirements to reduce the risks of liquefaction would be required. The geotechnical investigation and report would be required to be submitted as part of the environmental and building permit process for future development projects. Thus,

compliance with the CBC and CMCC, the goal and policies of the General Plan 2045, and site-specific recommendations identified during review, as necessary, would ensure impacts related to seismic-related ground failure, including liquefaction, would be considered less than significant. Therefore, the proposed project, like the approved project, would not result in a significant impact related to liquefaction. Therefore, no new impact would occur.

The Certified EIR did not identify any potential impacts in the proposed project area related to landslides. The proposed project area's topography is generally flat and there are no steep slopes within or around the proposed project area. The proposed project area is not shown as being within an area subject to earthquake-induced landslides identified by the State (DOC 2019). Consistent with the Certified EIR conclusions, future construction and operation of the proposed project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death related to landslides. Therefore, no new impact would occur.

Any future development facilitated by the proposed project would connect to existing sewer system and would not involve other alternative wastewater disposal systems. Future development would not use septic tanks or other alternative wastewater disposal systems. Thus, no new impact would occur.

The Certified EIR identified four fossil localities within the boundaries of the city. Future development implemented under the proposed project that includes construction-related ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring/drilling) into previously undisturbed sediments are activities that have potential to directly or indirectly destroy paleontological resources. However, intact paleontological resources may be encountered beneath the depth of previous disturbances or in pockets of undisturbed sediments within existing developments.

Mitigation Measure GEO-1 is required for future projects to ensure that paleontological resources are properly identified during the CEQA planning process and that the impact on any identified significant resources is reduced. These future projects within the city would be subject to project-specific paleontological studies, which would include a site-specific database search. Similar to the conclusions in the Certified EIR, with the implementation of MM GEO-1 and standard conditions of approval to avoid damage and promote preservation of paleontological resources, potential significant impacts related to paleontological resources would be reduced to a less than significant level. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts identified in the Certified EIR related to geology and soils. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
VII. GEOLOGY AND SOILS *Would the project*						
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	**LTS**	LTS	No	No	No	No
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	**LTS**	LTS	No	No	No	No
ii) Strong seismic ground shaking?	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
iii) Seismic-related ground failure, including liquefaction?	**LTS**	LTS	No	No	No	No
iv) Landslides?	**LTS**	LTS	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	**LTS**	LTS	No	No	No	No
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	**LTS**	LTS	No	No	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
indirect risks to life or property?						
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	**LTS**	LTS	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**LTS/M**	LTS/M	No	No	No	No

3.7.3 Adopted Mitigation Measures Applicable to the Proposed Project

Future development projects facilitated by the proposed project would be required to implement and adhere to the following mitigation measures in the Certified EIR, as applicable. No revisions to these mitigation measures are required.

> **Mitigation Measure GEO-1:** Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the City's approval of project plans and publication of subsequent CEQA documents.

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that construction of future new development has the potential to generate GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. The Certified EIR concluded that all future projects developed under the approved project would be required to comply with applicable EPA, CARB, and SCAQMD emissions standards, rules, and regulations, which limit diesel powered equipment and vehicle idling, and require higher-emitting equipment to be replaced with less polluting models.

The Certified EIR found that buildout of the approved project would reduce emissions when compared to the 2019 GHG emissions in the Culver City Planning Area (as shown in Table 4.7-7, Unmitigated Annual Greenhouse Gas Emissions, of the Certified EIR). The Certified EIR found

that the reduction would primarily be due to the focus of the General Plan 2045 and Zoning Code Update on infill development and development along transportation corridors to achieve an integrated land use mix, while reducing vehicle miles traveled (VMT) and associated emissions, improvements in vehicle emissions standards and, and improvements in building energy efficiency standards. The Certified EIR concluded that implementation of General Plan 2045 policies from the Community Health and Environmental Justice Element, Greenhouse Gas Reduction Element, Conservation Element and Safety Element—identified in Section 4.7, Greenhouse Gas Emissions, of the Certified EIR—would reduce GHG emissions. The Certified EIR concluded that the General Plan 2045 and Zoning Code Update would result in less than significant impacts related to GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The Certified EIR concluded that the General Plan 2045 and Zoning Code Update would be consistent with the applicable GHG emission reduction plans and policies in the CARB 2022 Scoping Plan actions and strategies, SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS), and the City of Culver City's Green Building Program, by including General Plan goals and policies that encourage zero emissions vehicles, reduction in VMT, carbon-free electricity, prioritize infill development, and building energy efficiency. The Certified EIR concluded that General Plan 2045 and Zoning Code Update would result in less than significant impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

3.8.2 Impacts Associated with the Proposed Project

The proposed project is a long-range planning/policy document that includes key strategies and development standards to provide the tools to implement General Plan 2045 goals and policies that support GHG emissions reduction. No specific development projects are proposed. Future development projects under the proposed project would be subject to applicable EPA, CARB, and SCAQMD emissions standards, rules, and regulations that would reduce GHG emissions resulting from construction activities. Future development allowed under the Specific Plan was accounted for in the operational GHG emissions results for the General Plan 2045 and Zoning Code Update buildout, identified in Table 4.7-7, Unmitigated Annual Greenhouse Gas Emissions, of the Certified EIR. Like the buildout of the approved project, the proposed project would result in a reduction in emissions compared to 2019 conditions in the proposed project area. In addition, the proposed project identifies potential locations for new mobility hubs (which could include bus stop amenities, secure bicycle parking, and micromobility stops), improvements to the existing Culver City Transit Center, a potential complete streets network with protected bicycle lands and new or updated crosswalks, and a potential public accessway network. All of these enhanced multi-modal projects support adopted General Plan 2045 Policy LU-7.2, Walkable Streets in Fox Hills, and Policy LU-7.5, Surface Parking Reuse, because they encourage the redevelopment of surface parking areas by allowing shared parking. The proposed project

would also be consistent with adopted General Plan 2045 policies such as Policy CHEJ-2.3, which would reduce vehicle-related emissions; CARB 2022 Scoping Plan actions and strategies (CARB 2022); and SCAG's 2020–2045 RTP/SCS (SCAG 2020). The proposed project's key strategies would encourage the improvement of mobility options and reduction of single-occupancy vehicle use, VMT, and related GHG emissions generated by future development projects in the Specific Plan area. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts identified in the Certified EIR with respect to GHG emissions. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
VIII. GREENHOUSE GAS EMISSIONS *Would the project*						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**LTS**	LTS	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	**LTS**	LTS	No	No	No	No

3.8.3 Adopted Mitigation Measures Applicable to the Proposed Project

There were no mitigation measures identified in the Certified EIR to address GHG emissions and no mitigation is required for the proposed project.

3.9 HAZARDS AND HAZARDOUS MATERIALS

3.9.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR identified that future developments allowed under the General Plan 2045 and Zoning Code Update could have the potential to generate hazardous materials. The Certified EIR determined that the use, transport, and disposal of construction-related hazardous materials would be required to comply with mandatory regulations for hazardous materials adopted by the EPA, Occupational Safety and Health Administration (OSHA), U.S. Department of Transportation (USDOT), California Environmental Protection Agency (Cal/EPA), Department of Toxic and Substances Control (DTSC), the California Department of Transportation (Caltrans), Los Angeles County Certified Unified Program Agency (CUPA), and SCAQMD.

In addition, the Certified EIR noted that the Culver City Fire Department (CCFD) would conduct inspections for fire safety and hazardous materials management of future businesses and residences. Future businesses handling or storing hazardous materials over threshold quantities would be required to submit a Hazardous Materials Business Plan (HMBP) to the Los Angeles County CUPA. The Certified EIR also determined that future development projects would comply with General Plan 2045 policies related the use and transport of hazardous materials, such as Policy S-8.2, which requires businesses that transport, use, and/or store hazardous materials to adopt measures that protect public health and safety. Accordingly, the Certified EIR concluded that hazards related to the transportation, use, and disposal of hazardous materials were less than significant.

The Certified EIR found that construction activities have the potential to release potentially hazardous materials in soil and groundwater into the environment during site grading and excavation operations. The Certified EIR found that any remediation would be required to satisfy the appropriate responsible agency, which could include DTSC, Los Angeles Regional Water Quality Control Board (RWQCB), Los Angeles County Fire Department (LACFD), or CCFD. The Certified EIR found that future development requiring demolition would be required to comply with the California Health and Safety Code (HSC), OSHA, and SCAQMD Rule 1403 related to removal of asbestos-containing materials (ACM) and lead-based paint (LBP). The Certified EIR also concluded that compliance with State law and implementation of federal, State, and local General Plan 2045 policies and actions during construction and operational activities would

ensure that future development allowed under the General Plan 2045 would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. The impacts were considered to be less than significant. In addition, the Certified EIR identified that future development would be required to comply with applicable Los Angeles County CUPA regulations to store, manage, and dispose of the materials in accordance with the Unified Program. Therefore, the impacts which may involve hazardous emissions or handling of hazardous materials and wastes, and may occur within one-quarter mile of an existing or future school, were considered less than significant. The Certified EIR found that any future development on a contaminated site would be required to comply with mandatory regulations under Cal/EPA, the EPA Resource Conservation and Recovery Act(RCRA), and HSC, to prevent the release of hazardous materials and protect the public from exposure to hazardous waste. Therefore, the impacts related to hazardous materials sites creating a significant hazard to the public and environment would be less than significant.

The Certified EIR concluded that the General Plan 2045 and Zoning Code Update would not conflict with the process or interfere with evacuation route and that implementation of the General Plan 2045 and Zoning Code Update would not impair or interfere with an emergency response plan, including the Culver City and Culver City School District Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and Los Angeles County Operational Area Emergency Response Plan. Therefore, impacts were considered to be less than significant. Furthermore, the Certified EIR found that future development allowed under the General Plan 2045 and Zoning Code Update would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires with the adherence to the provisions in the California Fire Code (CFC) and General Plan 2045 Policies under Goal S-7 requiring new development to meet the minimum site design standards for fire safety.

3.9.2 Impacts Associated with the Proposed Project

The proposed project is within the boundaries of the Culver City Planning Area and includes the same land uses and densities as identified in the Certified EIR. The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. The construction and operation of future development projects under the proposed project could potentially involve the transport, use, and/or disposal of hazardous materials, which was also assumed in the Certified EIR. However, with adherence to applicable regulations set forth by OSHA, USDOT, DTSC, Caltrans, Los Angeles County CUPA, and SCAQMD and applicable General Plan 2045 policies (under Goal S-8), future development projects under the Specific Plan would result in a less than significant impact related to the transport, use, and/or disposal of hazardous materials. The Certified EIR found that 114 sites within the General Plan 2045 planning area were listed on the GeoTracker database (managed by the State

Water Resources Control Board) and that most of the cleanup sites were closed and required no further action. Six of the 114 sites on the GeoTracker database pursuant to Government Code Section 65962.5 are within the proposed project area; they are closed leaking underground storage tank (LUST) cases that require no further action (given the sites have been cleaned up or remediated). Future development projects under the Specific Plan would comply with applicable mandatory regulations under Cal/EPA, RCRA, LACFD, RWQCB, HSC, SCAQMD, and Los Angeles County CUPA, to prevent the release of hazardous materials and protect the public from exposure to hazardous waste. Therefore, similar to the conclusions of the Certified EIR, the proposed project would result in a less than significant impact with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials, emissions or handling of hazardous materials within one-quarter mile of a school, and significant hazards to the public and environment due to hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, no new impact would occur.

The nearest airport to the proposed project area is the Los Angeles International Airport (LAX), approximately 1.8 miles southwest of the Plan area. However, the proposed project area is located outside of the Airport Influence Area (AIA) and 65 dB Community Noise Equivalent Level (CNEL) contour identified in the Los Angeles County Airport Land Use Plan, adopted in 1991 and revised in 2004. Therefore, future development within the proposed project area would not expose people working and residents in the area to airport/aircraft safety hazards or excessive noise levels. No new impact would occur.

Additionally, similar to the conclusions in the Certified EIR for the General Plan 2045 and Zoning Code Update buildout, future development projects allowed under the Specific Plan would identify evacuation routes in compliance with General Plan Policy S-7-14 and would not interfere with the Los Angeles County Operational Area Emergency Response Plan or the MJHMP. Therefore, similar to the conclusions in the Certified EIR, future development under the Specific Plan would not significantly affect the implementation of an emergency response or evacuation plan. In addition, as with the General Plan 2045 and Zoning Code Update buildout, future development under the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires with the adherence to the provisions in the CFC and General Plan 2045 Policies under Goal S-7 requiring new development to meet the minimum site design standards for fire safety. No new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts identified in the Certified EIR, with respect to hazards and hazardous materials. Additionally, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
IX. HAZARDS AND HAZARDOUS MATERIALS *Would the project*						
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**LTS**	LTS	No	No	No	No
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?	**LTS**	LTS	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
of an existing or proposed school?						
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	**LTS**	LTS	No	No	No	No
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	**LTS**	LTS	No	No	No	No
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	**LTS**	LTS	No	No	No	No

3.9.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to hazards or hazardous materials, and no mitigation is required for the proposed project.

3.10 HYDROLOGY AND WATER QUALITY

3.10.1 Summary of Hydrology and Water Quality Impacts Identified in the Certified EIR

The Certified EIR concluded that future development allowed under the General Plan 2045 and Zoning Code Update would be required to comply with the laws, regulations, and permits that regulate water quality and stormwater discharge, including the water quality standards or waste discharge requirements established in the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, Los Angeles Regional Water Quality Control Board (LARWQCB) General NPDES Permit, and Los Angeles County MS4 Permit. The Certified EIR concluded that project applicants for future developments that disturb one acre or more would be required to prepare and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP), which would identify site-specific BMPs to minimize stormwater runoff and reduce off-site pollution as well as soil erosion during the construction phase.

The Certified EIR determined that future development would also comply with the Los Angeles County Low Impact Development (LID) Ordinance, the Culver City Municipal Code (CCMC) Sections 5.05.010 and 5.05.040, and the City's Standard Urban Stormwater Mitigation Plan (SUSMP) and Stormwater Quality Master Plan (SWQMP) post-construction, and General Plan 2045 policies under Goal INF-5. The permits and ordinances would require future development projects to incorporate BMPs which would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater. Accordingly, the Certified EIR concluded that implementation of the General Plan 2045 and Zoning Code Update would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. Therefore, impacts to water quality were considered less than significant.

The Certified EIR concluded that future development allowed under the General Plan 2045 and Zoning Code Update would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered, and would not preclude any of these groundwater recharge processes established for the Santa Monica Subbasin, West Basin, and West Coast Basin, the groundwater basins underlying the planning area. Accordingly, the General Plan

would not result in the depletion of groundwater supplies or interfere with groundwater recharge and impacts would be less than significant. In addition, the Certified EIR concluded that adherence to regional and City permits regulations, General Plan 2045 Goal S-6, and policies that encourage maintenance of the City's stormwater system would limit surface runoff from development under the General Plan 2045, reducing siltation and erosion. Future development projects would result in a less than significant impact with respect to substantial alteration of existing drainage patterns.

The Certified EIR concluded that although most of the planning area is outside of the flood hazard zone and that future development would be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, and General Plan 2045 policies under Goal S-6, which would reduce the risk of on-site flooding and release of pollutants. In addition, as described in the Certified EIR, implementation of the General Plan 2045 and Zoning Code Update would not interfere with or conflict with the Groundwater Sustainability Plan (GSP) or a water quality control plan since the General Plan 2045 and Zoning Code Update include various implementation actions that support the GSP. Therefore, the Certified EIR concluded that future development would not conflict with a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

3.10.2 Impacts Associated with the Proposed Project

The proposed project is in the Culver City Planning Area and is consistent with the development assumptions in the General Plan 2045. The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. Future developments would be subject to the same applicable City and regional permits and stormwater management plans, as well as the CCMC standards (described in Section 3.10.1, *Summary of Hydrology and Water Quality Impacts,* of this Addendum) pertaining to limiting polluted stormwater runoff and alteration to existing drainage systems. The proposed project includes a potential public accessway network which could add 3.33 acres of publicly accessible open space with pervious surfaces. Future development projects allowed under the Specific Plan would likely add less impervious surfaces to the proposed project area than assumed in the Certified EIR, which would further reduce impacts to the City's drainage systems. Accordingly, similar to the conclusions for the General Plan 2045 and Zoning Code Update, the proposed project would not violate any water quality standards or substantially alter the existing drainage patterns in the city. Therefore, no new impact would occur.

The proposed project area is primarily within the West Coast Basin; the northwestern corner of the proposed project area is in the Santa Monica Basin (DWR 2026). Consistent with the Certified EIR conclusions, the future development allowed under the proposed project would

not result in the depletion of groundwater supplies or interfere with groundwater recharge. Therefore, no new impact would occur.

The proposed project area is not located within a Special Flood Hazard Area (100-year flood zone) designated by Federal Emergency Management Agency (FEMA 2026), seiche zone, or tsunami hazard area (CGS 2026). Therefore, future development allowed under the proposed project would have a low risk of pollutant release due inundation. Consistent with the future development would be required to comply with all applicable laws, regulations, permits, and policies, including Los Agency County CUPA hazardous materials storage requirements, which would reduce the impacts due to the release of pollutants during inundation to less than significant level. Therefore, no new impact would occur.

Consistent with the Certified EIR conclusions for the approved project, the proposed project would not interfere with or conflict with a Groundwater GSP or a water quality control plan. Future development under the proposed project would be required to include stormwater infiltration where feasible, and NPDES permit BMPs that reduce impacts to water quality. In addition, future development projects would comply with the CBC which requires preparation of engineering geology reports to assess groundwater supply. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to hydrology and water quality. In addition, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
X. HYDROLOGY AND WATER QUALITY *Would the project*						
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	**LTS**	LTS	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	**LTS**	LTS	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
stream or river or through the addition of impervious surfaces, in a manner which would:						
i) result in substantial erosion or siltation on- or off-site;	**LTS**	LTS	No	No	No	No
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	**LTS**	LTS	No	No	No	No
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	**LTS**	LTS	No	No	No	No
iv) impede or redirect flood flows?	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	**LTS**	LTS	No	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	**LTS**	LTS	No	No	No	No

3.10.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR did not require mitigation measures to be implemented to reduce significant impacts related to hydrology and water quality. No mitigation measures are required for the proposed project.

3.11 LAND USE AND PLANNING

3.11.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR found that implementation of the approved project would not conflict with the City of Culver City General Plan 2045 or other adopted land use plans, policies, or regulations that are intended to avoid or mitigate an environmental effect, and would be consistent with applicable regional and local planning documents. The Certified EIR determined that the approved project would not physically divide a community or introduce incompatible uses that would disrupt existing land use patterns. The City's comprehensive plan framework, consistency of land use designations, and policy implementation through the updated Zoning Code supports orderly growth and land use compatibility. Impacts related to land use and planning were concluded to be less than significant without the need for additional mitigation measures, as compliance with adopted policies and regulatory frameworks ensures that potential conflicts are avoided.

3.11.2 Impacts Associated with the Proposed Project

The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. The proposed project area is currently developed with residential and commercial land uses. The proposed project is in the existing Fox Hills Neighborhood and would not include any features or improvements that would obstruct travel through or around the Fox Hills Neighborhood or otherwise physically divide the surrounding community. Therefore, no new or worsened impacts would occur and impacts would remain less than significant.

The Certified EIR identified a less than significant impact associated with existing surrounding land uses and applicable land use plans. The Certified EIR determined that the approved project's goals and objectives were consistent with the SCAG Regional Policies. The proposed project establishes the regulatory tools needed to implement the General Plan 2045 goals and policies for the Fox Hills Neighborhood. The proposed project land use designations would be

consistent with the approved General Plan 2045 designations evaluated in the Certified EIR. The proposed project would not increase the land use densities allowed under General Plan 2045 and Certified EIR but is meant to be the guiding framework for these previously approved changes. The proposed project would allow an increase in the maximum building height (by 64 feet) for future hotel developments, primarily in the central portion of the proposed project area, compared to the maximum heights of 56 feet analyzed in the Certified EIR. Although the increased hotel building heights may slightly increase the square footage of the hotel buildings, this change would not result in an increase in the overall commercial square footage analyzed in the Certified EIR for the approved project buildout. Therefore, the proposed project would not result in an increase in development allowed under the Certified EIR. Additionally, the proposed project establishes minor modifications to the zoning districts in the Specific Plan area that would be consistent with the land use designations in the adopted General Plan 2045, and includes development standards that would regulate future projects in the Specific Plan area. The proposed project would not require changes to adopted General Plan 2045 land use designations. Furthermore, the Specific Plan area is not part of the habitat preserve, Habitat Conservation Plan, or Natural Community Conservation Plan (CDFW 2025). Therefore, no new or worsened impacts would occur and impacts would remain less than significant. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to land use and planning. In addition, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
X11. LAND USE AND PLANNINT *Would the project*						
a) Physically divide an established community?	**LTS**	LTS	No	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	**LTS**	LTS	No	No	No	No

3.11.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to land use and no mitigation is required for the proposed project.

3.12 MINERAL RESOURCES

3.12.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that Culver City Planning Area contains areas designated Mineral Resources Zone (MRZ)-1 and MRZ-3. MRZ-1 indicates that no significant mineral resources are present or it is judged that little likelihood exists for their presence; MRZ-3 indicates the significance of mineral deposits cannot be determined from the available data. The General Plan 2045 does not identify any local mineral resource recovery sites in the city but does identify the ongoing production of oil and gas associated with the City's portion of the Inglewood Oil Field (IOF). The Certified EIR found that implementation of the General Plan 2045 and Zoning Code Update would not remove the existing oil and gas deposits nor preclude access to the oil and gas through development of this area. Therefore, the Certified EIR found that implementation of the General Plan 2045 and Zoning Code Update would not result in the loss of availability of a known non-fuel mineral resource that would be of value to the region and residents of the State, nor would it create the loss of availability of a locally important mineral resource recovery site. Accordingly, the Certified EIR concluded there would be no impact to aggregate mineral resources and less than significant impacts to oil and gas resources.

3.12.2 Impacts Associated with the Proposed Project

The proposed project area is in the Fox Hills Neighborhood of the Culver City Planning Area identified in the Certified EIR. Based on Figure 4.11-1, Mineral Resources Zones (MRZs), in the Certified EIR, most of the proposed project area is within MRZ-1 and a portion of it is within MRZ-3. Consistent with the conclusions of the Certified EIR, there are no aggregate mineral resource mines or other mineral resource mines within the Culver City Planning Area (DOC 2026c). The proposed project area is not in the IOF identified in the Certified EIR and has no potential the impact oil and gas resources within the IOF. Therefore, the proposed project would have no impact with respect to the loss of availability of a known mineral resource that would be of value to the region residents of the State or of a locally important mineral resource recovery site (or an active mine) delineated on a local land use plan.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts previously identified in the Certified EIR, with respect to mineral resources. In addition, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XII. MINERAL RESOURCES *Would the project*						
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	**LTS**	NI	No	No	No	No
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	**LTS**	NI	No	No	No	No

3.12.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to mineral resources and no mitigation is required for the proposed project.

3.13 NOISE

3.13.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that future development projects would comply with the restrictions in Chapter 9.07 of the CCMC and General Plan 2045 Policies N-4.1, N-4.2, and N-4.4 related to reducing noise generated from construction activities. The Certified EIR concluded that future developments within 500 feet of noise-sensitive receptors would be required to implement Mitigation Measure NOI-1, which requires applicants to submit a construction noise study to the City prior to issuance of a building or grading permit. A project-specific construction noise analysis will be prepared to determine significance in accordance with CEQA. The Certified EIR concluded that even with the implementation of MM NOI-1, noise levels could exceed the applicable standards and impacts related to the temporary increase in ambient noise levels in excess of applicable noise standards would be significant and unavoidable.

The Certified EIR concluded that traffic along Washington Boulevard between Inglewood Boulevard and South Centinela Avenue could exceed 3 dBA (A-weighted decibels) CNEL, compared to noise levels without the General Plan 2045 and Zoning Code Update buildout. The Certified EIR concluded that future development projects would comply with General Plan 2045 Policies such as N-3.1, N-3.4, and N-3.6, which would reduce noise generated from roadway mobile sources. The Certified EIR concluded there were no feasible mitigation measures to reduce traffic noise levels. The Certified EIR found that while General Plan 2045 policies would limit traffic noise exposure at sensitive receptor locations, the policies would not ensure that noise levels would be reduced to levels within the City's noise standards at all sensitive receptors. The impacts related to the permanent increase in ambient noise levels (from traffic) in excess of applicable noise standards were considered significant and unavoidable.

The Certified EIR concluded future development under the General Plan 2045 could expose existing and new sensitive receptors to stationary noise sources, such as rooftop heating, ventilation, and air conditioning units. In addition, the Certified EIR concluded that future projects would be required to demonstrate consistency with General Plan 2045 Policies N-5.1 and N-5.2 related to reducing noise generated from stationary sources, and that compliance

with the Culver City Municipal Code noise control ordinance and General Plan 2045 policies would reduce impacts from stationary noise sources to a less than significant level.

The Certified EIR concluded that it is possible that future development projects under the General Plan 2045 and Zoning Code Update could generate construction groundborne vibration and groundborne noise levels that exceed the specified limits in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual for potential structural damage and/or human annoyance and result in a significant impact. The Certified EIR concluded that future developments projects would be required to comply with General Plan 2045 Policies N-4.1, N-4.2, N-4.3, and N-4.4 related to reducing groundborne noise and groundborne vibration generated from construction activities. Based on the Certified EIR, applicants for new development projects in the city that are subject to CEQA review (i.e., non-exempt projects), are within 300 feet of groundborne vibration sensitive receptors, and utilize vibration-intensive construction equipment would be required to implement MM NOI-2, which requires submittal of a vibration impact evaluation to the City prior to issuance of a grading or building permit. However, the Certified EIR concluded that even with implementation of MM NOI-2**,** impacts during construction could exceed applicable standards, and construction vibration impacts would be significant and unavoidable.

3.13.2 Impacts Associated with the Proposed Project

The proposed project is consistent with the land uses assumed in the General Plan 2045 (analyzed in the Certified EIR). The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. Future development facilitated by the proposed project is within the scope of the General Plan 2045 and was accounted for in the Certified EIR. Similar to the conclusions in the Certified EIR pertaining to the General Plan 2045 and Zoning Code Update buildout, future construction under the Specific Plan could generate significant noise at sensitive receptors. Like the approved General Plan 2045 and Zoning Code Update, future development allowed under the Specific Plan would be required to implement Mitigation Measure NOI-1, which requires applicants of future developments within 500 feet of noise-sensitive receptors to submit a construction noise study to the City. Implementation of MM NOI-1 does not guarantee the reduction in noise levels at all sensitive receptors. Accordingly, the impacts related to the temporary increase in noise levels in excess of applicable standards would be significant and unavoidable, which is the same conclusion identified in the Certified EIR. Therefore, no new impact would occur.

The Certified EIR found that traffic noise along Washington Boulevard between Inglewood Boulevard and South Centinela Avenue from the General Plan 2045 and Zoning Code Update buildout could exceed 3 dBA CNEL (the significance threshold). The traffic noise from future development of the Specific Plan was accounted for in the Certified EIR noise analysis and

contributes to the significant impact. However, future development under the proposed project would not result in an exceedance in the traffic noise projections identified in the Certified EIR. The proposed project's key strategies that support a public accessway network, mobility hubs, and complete streets network would improve the walkability of the area and encourage alternative modes of transportation, which could reduce vehicle trips. Like the conclusions in the Certified EIR, there are no feasible mitigation measures to reduce traffic noise. Therefore, the impacts related to the permanent increase in traffic noise levels excess of applicable standards would be significant and unavoidable, which is the same conclusion identified in the Certified EIR. Therefore, no new impact would occur.

Future development projects would implement be required to implement MM NOI-2, which requires submittal of a vibration impact evaluation to the City and incorporation of applicable mitigation measures to reduce construction vibration impacts for future projects within 300 feet of groundborne vibration sensitive receptors. With the implementation of MM NOI-2, impacts during construction could exceed applicable standards, and construction vibration impacts would be significant and unavoidable, which is the same impact identified in the Certified EIR. Therefore, no new impact would occur.

Like the conclusions for future development under the General Plan 2045 and Zoning Code Update, future development projects allowed under the Specific Plan would comply with the General Plan 2045 Policies N-5.1 and N-5.2 related to reducing noise generated from stationary sources, and the Culver City Municipal Code, which would result in a less than significant impact related to the permanent increase in stationary source (e.g., mechanical rooftop equipment and heating, ventilation, and air conditioning systems) noise levels in excess of applicable standards, which is the same conclusion identified in the Certified EIR. Therefore, no new impact would occur.

The proposed project area is outside the 65 dBA CNEL noise contour line for LAX, identified in the Los Angeles County Airport Land Use Plan. Therefore, the future development under the Specific would not expose people working or residing in the area to excessive noise levels and the impact would be less than significant. In addition, the Certified EIR requires new or renovated noise-sensitive uses proposed along the Metro E Line route in the city to evaluate potential train noise levels at the individual site and, if required. The nearest Metro E railway is approximately 2.7 miles north of the proposed project area (on National Boulevard). Therefore, future development allowed under the Specific Plan would not require an evaluation of train noise levels. Therefore, no new impact would occur.

The proposed project would not result in any new significant impacts and or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to noise. The significant unavoidable impacts identified in the Certified EIR would not be worsened. Likewise, there is no new information of substantial importance requiring new

analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XIII. 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?	**SU**	SU	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	**LTSM**	LTSM	No	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?						

3.13.3 Adopted Mitigation Measures Applicable to the Proposed Project

Future development projects facilitated by the proposed project would be required to implement and adhere to the following mitigation measure in the Certified EIR, as applicable. No revisions to this mitigation measures are required.

MM NOI-1: Construction Noise. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
- Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
- Limit non-essential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.

MM NOI-2: **Construction Vibration**. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration

receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.

Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet.
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet.
- Roller (for site ground compaction or paving): 75 feet.
- Impact pile-driving: 280 feet.

This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.

3.14 POPULATION AND HOUSING

3.14.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that implementation of the General Plan 2045 would accommodate anticipated population growth consistent with regional forecasts and would not induce growth beyond levels planned for by the City and the SCAG. While redevelopment under the approved project could result in the demolition of existing housing units and potential displacement of residents, the approved project includes policies and programs to promote housing replacement, housing affordability, and compliance with State housing laws, including the Housing Element and relocation requirements. With implementation of these policies and

regulatory requirements, impacts related to population growth and housing displacement would be reduced to less than significant levels, and no additional mitigation measures are required beyond compliance with adopted plans, policies, and applicable regulations.

3.14.2 Impacts Associated with the Proposed Project

The proposed project would establish a framework that would guide future development and public improvements within the proposed project area. The proposed project would not result in an increase population or the number of jobs, compared to what was evaluated in the Certified EIR, and would not include the demolition or removal of any housing. The proposed project would not include infrastructure that would generate indirect growth. Similar to the conclusions in the Certified EIR, future development would have a less than significant impact with respect to population growth. The proposed project is consistent with the population and jobs assumptions for the proposed project area identified in the Certified EIR.

Future projects under the Specific Plan would include the redevelopment of existing commercial and office with mixed use developments (which would include housing). Future development under the Specific Plan would not remove existing housing. Therefore, future development under the proposed project would have no impact with respect to displacement of people or housing. As with the approved project, future development under the proposed project would result in net increase in residential units. Therefore, no new impact would occur.

The proposed project would not result in any new significant impacts and or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to noise. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XIV. POPULATION AND HOUSING *Would the project*						
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	LTS	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	LTS	No	No	No	No

3.14.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to population and housing and no mitigation is required for the proposed project.

3.15 PUBLIC SERVICES

3.15.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR concluded that while population growth and development facilitated by the General Plan 2045 and Zoning Code Update would increase demand for public services, such growth would be planned, incremental, and accommodated through the City's comprehensive planning framework, existing service standards, and ongoing capital improvement and facility planning efforts. Public services would continue to be provided through established funding mechanisms, development impact fees, and compliance with applicable regulatory and service provider requirements. Implementation of the approved project would not require the construction of new public facilities beyond those already anticipated in adopted plans, nor would it result in substantial adverse physical environmental impacts related to public services. Therefore, impacts related to public services would be less than significant.

3.15.2 Impacts Associated with the Proposed Project

The Certified EIR identified impacts associated with fire and police protection services to be less than significant. The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. Future development under the proposed project was accounted for in the Certified EIR. Future projects would be reviewed by the City, Culver City Fire Department (CCFD), and Culver City Police Department (CCPD) on an individual basis and would be required to comply with applicable requirements. As with the approved project, future development under the proposed project would result in an incremental increase in population and employment in the Specific Plan area. The increase in population and employment would add to the number of service calls received and to the number of patrols and staff from CCFD and CCPD necessary to service the planning area. Future growth in accordance is expected to create the typical range of calls for fire and police services. Consistent with the conclusions for the approved project, to serve future growth, new and/or additional police and fire resources and equipment would be needed to maintain the established service ratios and police response times. Future development projects under the

approved project and proposed project would be reviewed by the City on an individual basis and would need to comply with any impact fee requirements in effect when the review is conducted and necessary permits are issued. The proposed project would not result in additional in the need for new fire or police personnel and equipment beyond what was assumed in the Certified EIR. Therefore, no new impact would occur.

The Certified EIR identified a less than significant impact associated with school facilities. No specific projects are proposed at this time. Future growth in accordance with the approved project may indirectly lead to an increase in school enrollment. Culver City Unified School District (CCUSD) would continue to collect development impact fees throughout implementation of the proposed project, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA, per SB 50. In addition, as estimated housing growth and student generation under the approved project are based on realistic development capacity of proposed land uses designations in the City, a student population that exceeds these estimates is unlikely. Impacts of the proposed project related to student generation and the potential need for additional school facilities would be less than significant. Therefore, no new impact would occur.

Future development facilitated by the proposed project would occur within the proposed project area, which contains open space areas but does not operate as a park. The Specific Plan includes five key strategies to meet the General Plan 2045 goals and policies pertaining to the Fox Hills Neighborhood, and create a connected, green (open space), and livable mixed-use neighborhood. The proposed project includes a conceptual public accessway network that could connect to Fox Hills Park. Because the proposed project would not result in an increase in population compared to the approved project, the proposed project would not develop the need for additional park or recreational facilities or other public service facilities, such as libraries. Therefore, no new impact would occur. Therefore, no new impact would occur.

The proposed project would not result in any new significant impacts and or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to public services. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XV. PUBLIC SERVICES *Would the project*						
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:						
Fire protection?	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
Police protection?	**LTS**	LTS	No	No	No	No
Schools?	**LTS**	LTS	No	No	No	No
Parks?	**LTS**	LTS	No	No	No	No
Other public facilities?	**LTS**	LTS	No	No	No	No

3.15.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to public services and no mitigation is required for the proposed project.

3.16 RECREATION

3.16.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR determined that population growth associated with the General Plan 2045 and Zoning Code Update would incrementally increase demand for parks and recreational facilities; however, the City's existing park system, adopted level-of-service standards, parkland dedication requirements, and development impact fees would ensure that adequate recreational facilities are provided to serve future residents. In addition, the General Plan 2045 includes policies that promote park expansion, joint-use facilities, and improved access to recreational amenities. Implementation of the approved project would not result in substantial physical deterioration of existing recreational facilities or require new recreational facilities beyond those planned for in adopted policies and programs. Accordingly, impacts related to recreation would be less than significant.

3.16.2 Impacts Associated with the Proposed Project

The Certified EIR identified a less than significant impact associated with new recreational facilities. Implementation of the proposed project would not result in an increase in population compared to the approved project because the proposed project is consistent with the growth projections analyzed in the Certified EIR. Thus, no new or expanded recreational facilities are required. Therefore, as under the proposed project, no impact would occur. Therefore, no new impact would occur.

The proposed project area is developed with residential and commercial uses and does not currently operate as a park or public recreational facility. The proposed project would not result in an increase in population compared to the approved project or otherwise directly or indirectly result in new population growth. The proposed public accessway network would increase the amount of open space by 3.33 acres, which would reduce the demand on existing neighborhood and regional parks. Thus, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, no new impact would occur.

The proposed project does not include the construction of new recreational facilities beyond what was assumed in the Certified EIR. In addition, as described above, the proposed project would not increase the use of recreational facilities. Therefore, the proposed project would not necessitate the construction or expansion of new recreational facilities. Therefore, no new impact would occur.

The proposed project would not result in any new significant impacts and or a substantial increase in the severity of impacts previously identified in the Certified EIR with respect to recreation. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XVI. RECREATION *Would the project*						
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	**LTS**	LTS	No	No	No	No
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	**LTS**	LTS	No	No	No	No

3.16.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to public services and no mitigation is required for the proposed project.

3.17 TRANSPORTATION/TRAFFIC

3.17.1 Summary of Transportation/Traffic Impacts Identified in the Certified EIR

The Certified EIR concluded that the implementation of the approved project would improve connections to local and regional transit services and encourage the use of alternative modes of transportation including walking and biking through supportive land use development in accordance with General Plan 2045 Mobility Element Policies. The Certified EIR concluded that the goals and policies in the Mobility Element would be consistent with the City's existing Short Range Mobility Plan (Culver City 2022), Bicycle and Pedestrian Action Plan (Culver City 2020), Complete Streets Policy (Culver City 2025), and Local Road Safety Plan (Culver City 2021a). Accordingly, the Certified EIR concluded that General Plan 2045 and the Zoning Code Update (which created the zoning districts and development standards associated with each of the land use designations) would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and the impact was considered less than significant.

The Certified EIR found that, based on a VMT which included results usings the Citywide Travel Demand Forecasting Model, Table 4.16-1, General Plan 2045 Buildout VMT Metrics, of the Certified EIR shows that at General Plan 2045 buildout, future development would result in an average daily VMT per capita, VMT per employee, and total VMT per service population above the 15 percent threshold. The Certified EIR concluded that even with implementation of all goals and policies contained in the Mobility Element and zoning districts that would promote transit priority lanes, higher density near transit, multimodal connectivity, integrated public transportation services, and prioritize public transit and mobility service, building of the General Plan 2045 and the Zoning Code update would result in a significant VMT. The impacts were considered significant and unavoidable.

The Certified EIR concluded that access locations for future development allowed under the General Plan 2045 would be designed to the City's standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to meet the City's requirements to protect pedestrian safety. Based on the Mobility Element Goal M-1 and

associated policies regarding transportation network safety, the General Plan 2045 provides safety benefits by reducing motor vehicle collision exposure, lowering speeds, and increasing pedestrian and cyclist volumes. Accordingly, the Certified EIR concluded that the General Plan 2045 and the Zoning Code Update (which includes development standards that support transportation network safety-related policies) would not substantially increase hazards due to a geometric design feature or incompatible use, and this impact was considered less than significant. Additionally, the Certified EIR determined that future development under the proposed General Plan 2045 would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable, and would be subject to the City's development review process. The Certified EIR concluded that the City's development review process would ensure that future development under the General Plan 2045 and Zoning Code Update would be consistent with these policies and would not hinder emergency access for individual sites. Accordingly, the Certified EIR concluded that the General Plan 2045 and Zoning Code Update would not result in inadequate emergency access, and this impact was considered less than significant.

3.17.2 Impacts Associated with the Proposed Project

The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. The proposed project would include key strategies to prioritize pedestrian and bicycle improvement, expand the existing Culver City Transit Center, and new mobility hubs within the proposed project area. The potential public accessway network would link new development to the Culver City Transit Center, retail, and parks. In addition, the proposed project includes development standards for safe and complete streets. The proposed project would include development standards and key strategies that provide tools to implement General Plan 2045 Policy LU-7.2 which prioritizes pedestrian, bicycle, and emergency vehicle access with complete streets improvements; Policy LU-7.3, which encourages new buildings front onto main streets and provide sidewalk-oriented entries and facades; and LU-7.5, which promotes the redevelopment of surface parking areas with mixed-use development and shared parking, and related policies in the Mobility Element.

Similar to the conclusions for the approved project, the proposed project's key strategies to encourage complete streets improvements (which includes dedications for bicycle lanes and upgraded crosswalks, a public accessway network), and potential mobility hubs would be consistent with the adopted City's existing Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and Local Road Safety Plan. Therefore, the proposed project would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and the impact was considered less than significant.

The VMT analysis completed in the Certified EIR and described in Section 3.17.1, *Summary of Transportation/Traffic Impacts Identified in the Certified EIR*, accounted for the VMT from future development allowed under the Specific Plan. The proposed project encourages multi-modal improvements and access to transit which could reduce VMT. However, it is not known whether the potential future projects facilitated by the proposed project would reduce VMT below the significance threshold. Therefore, consistent with the Certified EIR conclusions, the proposed project would result in a significant and avoidable VMT impact. Consistent with the General Plan 2045 Mobility Element plan goals to improve safety within the transportation network, the proposed project includes potential complete streets improvements which would improve safety for pedestrians and bicyclists. Similar to the conclusions in the Certified EIR conclusions, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible use, and this impact would be less than significant. Therefore, no new impact would occur.

Future development allowed under the proposed project would comply with the City's design guidelines which incorporate safety and emergency access needs, where applicable, and would be subject to the City's development review process. Future development projects would not result in inadequate emergency access. The impacts related to emergency access would be less than significant, which is consistent with the Certified EIR conclusions for development allowed under the General Plan 2045 and Zoning Code Update. Therefore, no new impact would occur.

The proposed project would not result in any new significant impacts or the substantial increase in the severity of impacts previously identified in the Certified EIR with respect to transportation impacts. No significant unavoidable impacts identified in the Certified EIR would be worsened. Furthermore, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XV11. TRANSPORTATION/TRAFFIC *Would the project*						
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	**LTS**	LTS	No	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	**SU**	SU	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)?	**LTS**	LTS	No	No	No	No
d) Result in inadequate emergency access?	**LTS**	LTS	No	No	No	No

3.17.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to transportation/traffic and no mitigation is required for the proposed project.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 Summary of Impacts Identified in the Certified EIR

The City submitted notification and request-to-consult letters to California Native American tribes traditionally and culturally affiliated with the area in accordance with Assembly Bill 52 (AB 52), in March 2022, and Senate Bill 18 (SB 18), in March 2022 and February 2024. One tribe responded to the notification letters and requested a future consultation once specific developments that require ground disturbance are proposed under the approved project. No known tribal cultural resources were identified within the planning area during the environmental review process for the Certified EIR. The Certified EIR acknowledged the potential for previously unknown tribal cultural resources to be discovered during future construction activities. Mitigation measures were incorporated requiring that, in the event of an inadvertent discovery of tribal cultural resources, construction activities cease in the vicinity of the find, the City notify and consult with the appropriate tribes, and treatment measures—such as avoidance, preservation in place, or other culturally appropriate actions—be implemented in coordination with tribal representatives. With implementation of these mitigation measures and compliance with AB 52 and SB 18 consultation procedures, impacts to tribal cultural resources would be reduced to less-than-significant level.

3.18.2 Impacts Associated with the Proposed Project

AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests to be informed by the lead agency of projects in that geographic area and the tribe requests consultation, prior to the release of a Negative Declaration (ND), Mitigated Negative Declaration (MND), or EIR. The City completed the AB 52 tribal consultation process for the approved project prior to the release of the public review draft of the Certified EIR. AB 52 tribal consultation is not required for projects in which an Addendum to an ND, MND or EIR is prepared. Therefore, the proposed project is not subject to AB 52 tribal consultation process. Under SB 18, prior to the adoption or any amendment of a city or county's general plan, the city or county is required to conduct consultations with California Native American

tribes that are on the contact list maintained by the Native American Heritage Commission (NAHC). Because the proposed project includes a general plan amendment, in compliance with SB 18, on December 24, 2025, the City mailed letters to California Native American tribes, based on the list of tribes provided by the NAHC. The letters included notification about the proposed project and an invitation to consult regarding any potential tribal cultural resources within the Specific Plan area. In accordance with SB 18, tribes have 90 days after receipt of the letters to request a consultation. No California Native American tribes requested consultation within the 90-day period. One tribe, the Gabrieleno Band of Mission Indians–Kizh Nation, requested to be notified of future projects that would require ground-disturbing activities; the tribe did not request consultation for the proposed project or identify tribal cultural resources. Therefore, no known tribal cultural resources have been identified within the Specific Plan area, and the SB 18 process was completed as of March 24, 2026.

The proposed project is a long-range planning/policy document that includes key strategies and development standards building off the approved General Plan 2045 goals and policies. No specific development projects are proposed. However, there is the potential for undiscovered tribal cultural resources to be affected during ground-disturbing activities resulting from future development projects facilitated by the proposed project. Future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. In addition, implementation of Mitigation Measure CUL-2 would reduce potentially significant impacts related to tribal cultural resources to a less-than-significant level. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction in support of the City's goals for protection of cultural resources. Adherence to the regulations and implementation of proposed General Plan 2045 policies and implementation actions would ensure that the proposed project's impact with respect to tribal cultural resources would be less than significant. Therefore, no new or worsened impacts would occur and the impact would remain less than significant.

Like the approved project, the proposed project would be required to implement Mitigation Measures CUL-2. With implementation of this mitigation measure, impacts related to the substantial adverse change in the significance of a tribal cultural resource would continue to be less than significant. Thus, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts, previously identified in the Certified EIR, with respect to tribal cultural resources. Likewise, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XVIII. TRIBAL CULTURAL RESOURCES *Would the project*						
a) 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	**LTS/M**	LTS/M	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
of historical resources as defined in Public Resources Code section 5020.1(k), or						
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 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.	**LTS/M**	LTS/M	No	No	No	No

3.18.3 Adopted Mitigation Measures Applicable to the Proposed Project

The proposed project would be required to implement and adhere to MM CUL-2 in the Certified EIR. No revisions to the mitigation measure is required.

3.19 Utilities and Service Systems

3.19.1 Summary of Utilities and Service Systems Impacts Identified in the Certified EIR

The Certified EIR found that additional facilities could be constructed to serve future project demands and that a separate project-level environmental review would be required for these facilities. The Certified EIR determined there is sufficient capacity at the Los Angeles Sanitation and Environment's Hyperion Water Reclamation Plant (HWRP) and Los Angeles County Sanitation District's Joint Water Pollution Control Plant (JWPCP) to accommodate wastewater collection and treatment generated by the General Plan 2045 buildout and the Zoning Code Update and that future development projects would comply with applicable current and future statutory requirements. Therefore, the Certified EIR concluded that General Plan 2045 buildout and the Zoning Code Update would not result in insufficient wastewater collection and treatment and no new or expanded wastewater treatment facilities would be needed.

Additionally, the Certified EIR found that future development would comply with all applicable construction and operational laws, regulations, and permits related to discharging stormwater runoff into the City's stormwater and sewer system, and Safety Element policies supporting improvements to the stormwater drainage system, as described in Section 4.9, Hydrology and Water Quality, of the Certified EIR. It was concluded that compliance with City requirements and policies as well as applicable permits would ensure that runoff would not inundate existing storm drainage facilities such that new or expanded facilities would be required. The Certified EIR determined that if upgrades to electric power, natural gas, and telecommunications facilities for future development are required, the future facilities would be subject to environmental review under CEQA and required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, the Certified EIR concluded that future development would result in a less than significant impact with respect to the construction of any new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities.

The Certified EIR concluded that the water service providers for the City are Golden State Water (GSWC) Company and Los Angeles Department of Water and Power (LADWP). The Certified EIR

found that preparation of a Water Supply Assessment (WSA) in accordance with SB 610 or a Written Verification of Supply Report (under SB 221), compliance with Water Shortage Contingency Plans (WSCPs), implementation of water conservation measures identified in the Municipal Code, compliance with General Plan 2045 Infrastructure Element Policies, and adherence to the CALGreen Code would be required by future project applicants. Therefore, the Certified EIR concluded that Future development under the approved project would result in a less than significant impact with respect to the presence of sufficient water supplies for the General Plan 2045 buildout. Since the increase in wastewater flows from General Plan 2045 buildout would not exceed the treatment capacity at the HWRP or the JWPCP, the Certified EIR concluded that wastewater treatment providers have adequate capacity to serve the projected General Plan 2045 buildout demand. Therefore, impacts related to wastewater were considered to be less than significant.

The Certified EIR determined that Los Angeles County landfills would have the capacity to accommodate the solid waste generated by future development from the implementation of the General Plan 2045. The Certified EIR concluded that future development allowed under the General Plan 2045 and Zoning Code Update would be consistent with the recycling or salvaging requirements for nonhazardous construction and demolition debris identified in the City's Municipal Code and statewide requirements, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. Therefore, the Certified EIR determined that the impacts related to the generation of solid waste in excess of State or local standards and compliance with federal, state and local regulations related to solid waste would be less than significant.

3.19.2 Impacts Associated with the Proposed Project

Future development under the proposed project was accounted for in Section 4.18, Utilities and Service Systems, in the Certified EIR. The proposed project would not result in any changes to the land use designations and development identified for the Fox Hill Neighborhood (including the proposed project area). Therefore, future development under the proposed project would not increase the demand on utilities and service systems beyond what was assumed in the Certified EIR.

There would be sufficient wastewater treatment capacity to serve future development allowed under the proposed project, as assumed the General Plan 2045 and Zoning Code Update identified in the Certified EIR. Future development under the proposed project would comply with the applicable stormwater permits, regulations, and General Plan 2045 policies, and future buildout of the Specific Plan is not anticipated to require new or expanded facilities. Any future new or expanded water, stormwater, wastewater treatment, electric power, natural gas, or telecommunication facilities would require separate environmental review that would identify measures required to reduce significant impacts. Therefore, future development allowed under

the proposed project would result in a less than significant impact with respect to the construction of any new or expanded utilities and service systems, which is the same conclusion as the Certified EIR. Thus, no new impact would occur.

Future project applicants under the proposed project would comply with SB 610 and SB 221 and determine if a Water Supply Assessment (WSA) or a Written Verification of Supply Report is necessary. Future projects would also prepare Water Shortage Contingency Plans (WSCPs) in the event of a water shortage and implement water conservation measures identified in the Infrastructure Element, Municipal Code, and CALGreen Code. The HWRP or the JWPCP have sufficient wastewater treatment capacity for the General Plan 2045 and Zoning Code Update buildout, so they have capacity for Specific Plan buildout as well. Therefore, consistent with the conclusions in the Certified EIR, impacts related to sufficient water supplies and adequate wastewater treatment capacity would be less than significant. Thus, no new impact would occur.

Landfills in Los Angeles County would have the capacity to accommodate the solid waste generated by future development allowed under the proposed project, based on the conclusions in the Certified EIR for future development allowed under the General Plan 2045 and Zoning Code Update. Future development projects allowed under the Specific Plan would be consistent with the recycling or salvaging requirements for nonhazardous construction and demolition debris identified in the City's Municipal Code and Statewide requirements for waste reduction, recycling, and diversion. Therefore, impacts related to the generation of solid waste in excess of State or local standards and compliance with federal, State, and local regulations related to solid waste would be less than significant, which is consistent with the Certified EIR conclusions. Thus, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts, previously identified in the Certified EIR, with respect to utilities and service systems. Likewise, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XIX. UTILITIES AND SERVICE SYSTEMS *Would the project*						
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	**LTS**	LTS	No	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	**LTS**	LTS	No	No	No	No
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	**LTS**	LTS	No	No	No	No
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	**LTS**	LTS	No	No	No	No

3.19.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to utilities and service systems and no mitigation is required for the proposed project.

3.20 Wildfire

3.20.1 Summary of Impacts Identified in the Certified EIR

The Certified EIR determined that the City is a fully urbanized area and does not contain lands classified as Very High Fire Hazard Severity Zones (FHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). Implementation of the approved project would not result in development within wildfire-prone areas or increase wildfire risk. In addition, continued compliance with applicable fire codes, emergency access requirements, and coordination with the Culver City Fire Department would ensure adequate fire protection and emergency response capabilities. Accordingly, impacts related to wildfire hazards would be less than significant.

3.20.2 Impacts Associated with the Proposed Project

As the city is largely built out, development anticipated as a result of the proposed project would primarily occur as redevelopment within the urbanized areas of the city, which are already served by the local and regional transportation systems and have been accounted for in local and regional emergency response and evacuation plans. Through the City's emergency response and evacuation planning efforts, evacuation routes in the city have been designed to accommodate buildout of the approved project (which accounts for future development under the proposed project).

The proposed project area is not in a State Responsibility Areas (SRA) and is not in an area classified as a very high FHSZ by CAL FIRE (CALFIRE 2025). An SRA is an area where CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention. The eastern portion of the Culver City Planning Area, including the Culver Crest and Blair Hills neighborhoods, is designated as a VHFHSZ and is located directly north of the proposed project area (Culver City 2026). However, all development associated with implementation of the proposed project would be required to demonstrate compliance with applicable building and fire codes and regulations, including the Culver City Municipal Code (CCMC) and California Fire Code (CFC). Compliance with the applicable regulations, plans, and policies would help to reduce the potential for wildfires to start, mitigate the spread of wildfire, and aid in safely

evacuating persons affected by wildfires which would reduce the amount of people's exposure to smoke and air pollution. Therefore, no new impact would occur.

The proposed project would not result in new significant impacts or a substantial increase in the severity of impacts, previously identified in the Certified EIR with respect to wildfire. Likewise, there is no new information of substantial importance requiring new analysis or verification. The proposed project does not propose substantial changes that require major revisions to the Certified EIR, and no new mitigation measures are required.

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
XX. WILDFIRE *Would the project*						
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	**LTS**	LTS	No	No	No	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	**LTS**	LTS	No	No	No	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate	**LTS**	LTS	No	No	No	No

Issues	Specific Plan Impact Conclusion	GP EIR Impact Conclusion	Does the Specific Plan Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Specific Plan?
fire risk or that may result in temporary or ongoing impacts to the environment?						
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	**LTS**	LTS	No	No	No	No

3.20.3 Adopted Mitigation Measures Applicable to the Proposed Project

The Certified EIR does not contain any mitigation measures related to wildfire and no mitigation is required for the proposed project.

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4. SUMMARY OF FINDINGS

As summarized below, and for the reasons described in Section 3, *Environmental Analysis*, of this Addendum, the City has concluded that the proposed project meets the conditions of CEQA Guidelines Section 15164, and therefore an Addendum to the Certified EIR is the appropriate CEQA document to address the proposed project.

As previously discussed, under CEQA Guidelines Section 15164, an addendum to an EIR or MND may be prepared if only minor technical changes or additions are necessary or none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or MND have occurred. The following restates the standards in CEQA Guidelines Section 15162 as they relate to the proposed project.

1. **No substantial changes are proposed in the project which would require major revisions of the previous EIR due to the involvement of new significant environmental effect or a substantial increase in the severity of previously identified significant effect.**

   The proposed project is within the scope of the approved project as analyzed in the Certified EIR. The proposed project would not require any revisions to the Certified EIR, as the impact conclusions in this Addendum are the same as the Certified EIR conclusions.

2. **No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

   No substantial changes have occurred that would require revisions to the Certified EIR. The environmental setting of the proposed project area and regulatory requirements for future development projects are similar and would not require revisions to the Certified EIR.

3. **No 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**
   As discussed in Section 3, *Environment Analysis*, of this Addendum, the proposed project would not result in any new or more severe significant effects that were not identified in the Certified EIR.

B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

Future development under the Specific Plan was accounted for and analyzed in the Certified EIR. As described throughout the Addendum, the proposed project would not result in substantial increase in the severity of previously identified impacts or result in any new significant impacts.

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

Future development allowed under the proposed project would implement the adopted mitigation measures identified in the Certified EIR to reduce significant environmental effects related to air quality, biological resources, cultural resources, geology and soils, and construction and vibration noise. No mitigation measures found not to be feasible are feasible at this time.

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.

No changes to the mitigation measures identified in the Certified EIR are required for the proposed project. No new mitigation measures were identified to reduce significant effects.

5. LIST OF PREPARERS

PLACEWORKS

Addie Farrell, Principal
Amber Sharpe, Senior Associate
Itzeel Padilla, Project Planner
Cary Nakama, Graphic Artist
Gina Froelich, Senior Editor
Laura Muñoz, Document Specialist

CITY OF CULVER CITY

Troy Evangelho, AICP, Advance Planning Manager

STUDIO ONE ELEVEN

Shruti Shankar, AICP, Urban Design Director, Associate Principal
Jasmine Williams, LEED GA, AICP, Urban Design Manager

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6. REFERENCES

CalEPA (California Environmental Protection Agency). 2026. Cortese List Data Resources. https://calepa.ca.gov/sitecleanup/corteselist/.

CALFIRE (California Department of Forestry and Fire Protection). 2025. Fire Hazard Severity Zones. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.

CARB (California Air Resources Board). 2026. Airborne Toxic Control Measures. https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures.

CARB. 2022. Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

CalRecycle. 2026. Statewide Mandatory Organic Waste Collection: SB 1383. https://calrecycle.ca.gov/organics/slcp/collection/.

Caltrans (California Department of Transportation). 2026. California State Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

CDFW. (California Department of Fish and Wildlife). 2015. California Forests and Timberlands. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109917&inline.

CDFW. 2025. Conservation Plan Boundaries. https://data-cdfw.opendata.arcgis.com/datasets/CDFW::conservation-plan-boundaries-hcp-and-nccp-ds760/explore?location=34.086698%2C-118.294604%2C19.02.

CGS (California Geological Survey). 2026, January 28 (accessed). Tsunami Hazard Area Map. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.

CLI (California Legislative Information). 1989. Bill Number: Assembly Bill No. 939. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=198919900AB939.

CLI. 2001. Bill Number: SB 221. http://www.leginfo.ca.gov/pub/01-02/bill/sen/sb_0201-0250/sb_221_bill_20011009_chaptered.html.

CLI. 2007. Bill Number: Senate Bill No. 1016. http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_1001-1050/sb_1016_bill_20070223_introduced.pdf.

CLI. 2011. Bill Number: AB 341. http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0301-0350/ab_341_bill_20111006_chaptered.html.

CLI. 2025. Senate Bill 610. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB610.

Culver City, City of. 2020. Bicycle and Pedestrian Action Plan. https://www.culvercity.gov/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf.

Culver City. 2021a. Local Road Safety Plan: Final Report. https://www.culvercity.gov/files/assets/public/v/1/documents/public-works/mobility/2021-11-03-cc-localroadsafetyplan-lrsp-finalwappendices.pdf.

Culver City. 2021b. Stormwater Quality Master Plan. https://www.culvercity.gov/files/assets/public/v/1/documents/public-works/stormwater/stormwater-quality-master-plan-2021-final.pdf.

Culver City. 2022. Short Range Mobility Plan. FY 2022-2026. https://www.culvercitybus.com/files/assets/bus/v/2/documents/srmp_ccb_fy2022-2026_report_update_v2_web.pdf.

Culver City. 2024a. General Plan 2045. https://www.culvercity.org/files/content/public/v/3/have-your-say/general-plan-2045/general-plan-2045.pdf.

Culver City. 2024b. Culver City Zoning. https://www.culvercity.gov/Explore/City-Maps/J-Planning-Maps.

Culver City. 2024c. General Plan 2045 and Zoning Code Update: Final Environmental Impact Report. State Clearinghouse No. 2022030144. https://www.culvercity.gov/City-Hall/City-Departments/Planning-and-Development/Advance-Planning-Division/ZZ.-General-Plan-2045-Environmental-Review.

Culver City. 2025. Complete Streets Design Standards. https://www.culvercity.gov/files/assets/public/v/3/documents/public-works/mobility/cs-design-standards/complete-street-design-standards-edition-1.pdf.

Culver City. 2026. Fire Hazard Severity Zone (FHSZ) Updates. https://www.culvercityfd.gov/Fire-Services/Community-Risk-Reduction/High-Fire-Hazard-Zones/Fire-Hazard-Severity-Zone-FHSZ-Updates.

Culver City, City of, and Culver City Unified School District. 2024. Multi-Jurisdictional Hazard Mitigation Plan. https://www.culvercity.gov/files/assets/public/v/1/documents/

public-works/emergency/2024-08-12-ccreso-2024-r055-and-multi-jurisdictional-hazard-mitigation-plan-signed.pdf.

DOC (California Department of Conservation). 2019. California Geological Survey Seismic Hazards Program: Landslide Hazards. https://gis.data.ca.gov/datasets/cadoc::cgs-seismic-hazards-program-landslide-zones/explore?location=33.981253%2C-118.373999%2C15.

DOC. 2025a. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/.

DOC. 2025b. California Williamson Act Enrollment Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/.

DOC. 2026a. California Geological Survey Alquist-Priolo Site Investigation Reports. https://maps.conservation.ca.gov/cgs/informationwarehouse/apreports/.

DOC. 2026b. EQ Zapp: California Earthquake Hazards Zone Application. https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

DOC. 2026c, January 26. Mines Online. Conservation.ca.gov. https://maps.conservation.ca.gov/mol/index.html.

DWR (California Department of Water Resources). 2026, January 28, (accessed). SGMA Portal: Santa Monica Basin GSA. https://sgma.water.ca.gov/portal/gsa/print/337#:~:text=The%20newly%20created%20Santa%20Monica,Through%20Los%20Angeles%20County?

FEMA (Federal Emergency Management Agency). 2026, January 28 (accessed). FEMA Flood Map Service Center. Fema.gov. https://msc.fema.gov/portal/home.

FHWA (Federal Highway Administration). 2023, May. Safety Evaluations of Innovative Intersection Designs for Pedestrians and Bicyclists. Publication No. FHWA-HRT-23-052. U.S. Department of Transportation. https://highways.dot.gov/sites/fhwa.dot.gov/files/FHWA-HRT-23-052.pdf.

LARWQCB (Los Angeles Regional Water Quality Control Board). 2026. Stormwater: Construction General Permits. https://www.waterboards.ca.gov/losangeles/publications_forms/forms/.

LARWQCB. 2026. Los Angeles County MS4 Permit. https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/losangeles.html.

Los Angeles County. Operational Area Emergency Operations Plan. 2023. https://ceo.lacounty.gov/wp-content/uploads/2023/11/County-of-Los-Angeles-OAEOP-2023-Final-for-Website.pdf.

Los Angeles County. 1991. Airport Land Use Commission. Airport Land Use Plan. https://planning.lacounty.gov/wp-content/uploads/2022/10/Los-Angeles-County-Airport-Land-Use-Plan.pdf.

Los Angeles County. 2026. Public Health Department. 2026. Hyperion Water Reclamation Plant. http://publichealth.lacounty.gov/eh/focus/hyperion-water-reclamation-plant.htm.

Los Angeles County. 2025. Public Works Department. 2025. Low Impact Development Standards Manual. https://pw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf.

Los Angeles County Sanitation Districts. 2026. A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant).

Santa Monica, City of. 2022. Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin. https://www.santamonica.gov/gsp.

SCAG (Southern California Association of Governments). 2020. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments: Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/0903fconnectsocal-plan_0.pdf.

SCAQMD (South Coast Air Quality Management District). 1976. Rule 402: Nuisance. https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

SCAQMD. 2016. Rule 1113: Architectural Coatings. https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.

SCAQMD. 2022. Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61_16.

WRDSC (Water Replenishment District of Southern California). 2016. Groundwater Basins Master Plan: Final Report. https://www.wrd.org/files/a784a9e7b/Groundwater+Basins+Master+Plan%2C+2016.pdf.