11111 JEFFERSON BOULEVARD MIXED-USE PROJECT

Final Environmental Impact Report
State Clearinghouse No. 2020090329

Prepared for
City of Culver City
Culver City Case Nos:
P2021-0025- CP/DOBI/TPM/ZCMA

August 2021

ESA

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CHAPTER 1
Introduction

1.1 Purpose of the Final EIR

The City of Culver City (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed 11111 Jefferson Boulevard Mixed-Use Project (Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprise the Final EIR.

As described in CEQA Guidelines Sections 15088, 15089, 15090 and 15132, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

1.2 Project Summary

As further described in Chapter 2, Project Description, of the Draft EIR, the Project Site encompasses approximately 3.43 acres at 11111 Jefferson Boulevard in the southern part of Culver City. The Project Site is generally bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west.

The Project Site is relatively flat with elevations ranging from approximately 35 feet from the northwestern corner of the Project Site at the intersection of Sepulveda Boulevard and Machado Road and sloping down to 33 feet on the southern corner of the Project Site at the intersection of Sepulveda Boulevard and Jefferson Boulevard. The Project Site is made up of four parcels from north to south. The northernmost parcel consists of a surface parking lot with 34 parking spaces used by the Exceptional Children's Foundation (ECF) as off-site parking. The northern central parcel is occupied by a United States Post Office (27,225 sf) built in the early 1960s and includes a mail processing and distribution center and a rear loading dock. The next parcel to the south is occupied by Coco's Bakery Restaurant (6,064 sf) built in the late 1960s. The southernmost parcel is occupied by Valvoline Instant Oil Change (1,722 sf) built in the 1990s. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces, across all existing uses.

The Project would involve demolition of approximately 35,011 sf of existing buildings on the Project Site to support the new mixed-use development. The Project would consist of five stories of development over one subterranean level for vehicular parking and building infrastructure. The proposed five-story building would be 67 feet tall (70.5 feet including the parapet) with a total building area of 555,221 sf, including all parking areas (subterranean, ground level, and above-ground) and usable building area of 311,109 sf.[1] The Project would have a 2.08 floor area ratio (FAR).[2] The Project includes 244,609 sf of residential uses (including the residential lobby and amenity room) with 230 residential apartment units (including 19 affordable to very low income units); 66,500 sf of commercial uses, including a market, retail/restaurant uses and office uses; three levels of vehicular parking (653 spaces), including one subterranean level; and public and private open space areas.

The Project would provide an approximately 13,800 sf Machado Park, which would be publicly accessible but privately maintained as well as an approximately 13,000 sf Paseo Courtyard at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site would welcome pedestrian, bike, bus and other foot traffic through and into the Project Site. An additional 2,000 sf Entry Courtyard at the entrance on Sepulveda Boulevard across from Janisann Avenue would also be provided. All publicly accessible open space areas on the ground floor would be accessed from Machado Road, Sepulveda Boulevard, and Jefferson Boulevard, as well as from the interior of the Project Site from the ground-floor parking level or via escalators from the above- and below-ground parking levels.

There are currently ten driveways surrounding the Project Site: five on Sepulveda Boulevard, three on Jefferson Boulevard, and two on Machado Road. The Project would change the locations of and remove seven driveways, resulting in three remaining driveways to serve the Project Site. Vehicular access to the Project Site would be provided from one driveway on Sepulveda Boulevard at Janisann Avenue and two driveways on Machado Road. Access for trucks and deliveries would be off of Machado Road where they would access a 2,856 sf loading dock within the Project Site via the eastern-most retail entrance. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and modifications of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. This physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway would be required to turn right onto eastbound Machado Road. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions. In addition to proposed improvements on Machado Road, the Project would provide a raised curb extension at the intersection of Ballona Lane and Jefferson Boulevard that would prohibit vehicular entry except for emergency vehicles into the

[1] The building height is measured pursuant to Culver City Municipal Code (CCMC) Section 17.300.025, which requires that height be measured as the vertical distance from the existing grade of the site to an imaginary plane located the allowed number of feet above and parallel to the grade. The existing grade has been established through a survey as 34.8 feet.

[2] Floor area ratio (FAR) is calculated by using the usable square footage of 311,109 sf divided by the 149,553 sf Project Site area.

Heritage Park neighborhood from Jefferson Boulevard, and only allow for eastbound right-turns from Ballona Lane out of the neighborhood. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions.

The Project would provide three levels of vehicular parking including one subterranean level. Structured parking containing 653 vehicular parking spaces would be provided with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for ECF. Bicycle parking would include 71 long-term and 26 short-term bicycle parking spaces provided in various locations throughout the Project Site. Bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level. The Project would design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City. Separate from the Project, the City intends to implement a bicycle share facility on the Project Site adjacent to the Machado Park. The bicycle share facility would allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Bicycle & Pedestrian Action Plan.

1.3 Overview of the CEQA Public Review Process for the Draft EIR

In compliance with the CEQA Guidelines, the City, as the Lead Agency for the Project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact and solicit input from the public and various State, regional, and local government agencies and other interested parties on the Project.

1.3.1 Initial Study/Notice of Preparation

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project.

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 33-day review period commencing September 17, 2020 and ending October 19, 2020. The purpose of the NOP was to

formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1 of the Draft EIR for a copy of the NOP.

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments, and receive feedback in association with the entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the EIR Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The virtual Community Meeting and EIR Scoping Meeting were held on October 6, 2020, with the Community Meeting starting at 6:00 P.M. followed by the EIR Scoping Meeting at 7:00 P.M. The EIR Scoping Meeting was held in an online format using Zoom and provided interested individuals, groups, and public agencies the opportunity to view materials and ask questions regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials from the EIR Scoping Meeting are provided in Appendix A-3 of the Draft EIR.

During the public review period for the NOP, 51 commenters submitted responses to the NOP. Correspondence was received from the Native American Heritage Commission, the South Coast Air Quality Management District, the State of California Department of Transportation, interested organizations, and interested parties. All written comments are provided in Appendix A-4, of the Draft EIR.

1.3.2 Draft Environmental Impact Report

In accordance with the provision of CEQA Guidelines Sections 15085(a) and 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website:

> (https://www.culvercity.org/city-hall/city-government/city-departments/community-development/planning);

(5) sent a NOA to all property owners within 1,000 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on May 6, 2021 and ended on June 21, 2021 for a total of 47 days.

During the Draft EIR public review period, the City Planning Division received twenty (20) comment letters on the Draft EIR from agencies, organizations, and individuals through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters of this Draft EIR. Also during the Draft EIR public review period, the City conducted virtual

Community Meeting focused on the Project and a Public Meeting focused on the Draft EIR on May 25, 2021. This Public Meeting was not required by the CEQA Guidelines, but rather conducted by the City to provide an additional opportunity for public input. The Public Meeting on the Draft EIR provided an overview of the findings in the Draft EIR, explained the process for providing comments on the document, and outlined the remaining process for completion of a Final EIR. All written comments received during the public review period and also during the Public Meeting on the Draft EIR are presented, and responses are provided in Chapter 2, *Comments and Responses*, of this Final EIR.

1.4 Organization of the Final EIR

The Final EIR consists of the following four chapters:

Chapter 1, Introduction. This chapter describes the purpose of the Final EIR, provides a summary of the proposed Project, summarizes the Final EIR public review process, and presents the contents of this Final EIR.

Chapter 2, Comments and Responses. This chapter presents all comments received by the City during the 47-day public review period of the Draft EIR (May 6, 2021 to June 21, 2021) and during the virtual Public Meeting held on May 25, 2021 as well as the responses to those comments. A total of twenty (20) comment letters were received during the public comment period.

Chapter 3, Corrections and Additions to the Draft EIR. This chapter includes revisions to the Draft EIR that represent minor changes or additions in response to some of the comments received on the Draft EIR, and additional edits to provide clarification to the Draft EIR text. Changes to the Draft EIR are shown with ~~strikethrough~~ text for deletions and double underline text for additions. These changes do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR.

Chapter 4, Mitigation Monitoring Program. The Mitigation Monitoring Program (MMP) is the document that will be used by the City to ensure the implementation of the Project's mitigation measures and Project Design Features. Mitigation measures and Project Design Features are listed by environmental topic where applicable.

Appendices to the Final EIR. The following list sets forth the appendices as referenced throughout the Final EIR.

- Appendix A: Comments Received on the Draft EIR
- Appendix B: Draft EIR Public Meeting Materials

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CHAPTER 2
Comments and Responses

CEQA Guidelines Section 15088(a) states that: "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this chapter of the Final EIR provides responses to each of the comments on the Draft EIR received during the public comment period. **Table 2-1,** *Summary of Comments on the 11111 Jefferson Boulevard Mixed-Use Project Draft EIR,* provides a list of the comment letters received and the corresponding issues that were raised in response to the Draft EIR.

Section 2.1, Topical Response to Comments, provides a Topical Response. Topical responses are used to provide a comprehensive response to an issue raised by multiple commenters and/or to address broad issues associated with the Draft EIR. One such topical response has been included in this Final EIR: Topical Response TR-1, Non-CEQA Transportation Assessment. Topical Response TR-1 addresses non-CEQA transportation analyses including trip generation, level of service (LOS), congestion, and delay on surrounding roadways.

Section 2.2, Responses to Individual Comments, presents comments submitted during the 47 day public review comment period for the Draft EIR from State agencies, as well as from individuals and organizations as listed on Table 2-1. Each letter is assigned a number and arranged by agency first, and then by individuals and other interested parties in chronological order, as indicated in Table 2-1. Note as discussed in Chapter 1, *Introduction,* of this Final EIR, the City held a Public Meeting on the Draft EIR on May 25, 2021, during which written comments were received. These comments are addressed below within Letter 7.

Each comment that requires a response within the letters is also assigned a number. Each comment that requires a response within the letters is also assigned a number. For example, the first State Agency (Letter 1) to provide comments was the California Department of Transportation (Caltrans) and therefore this is Letter 1. The first comment received from Caltrans is therefore labeled Comment 1-1 and the responses to each comment are correspondingly numbered, (i.e., Response 1-1). A copy of each comment letter is provided in Appendix A, Original Comment Letters, of this Final EIR.

TABLE 2-1
SUMMARY OF COMMENTS ON THE 11111 JEFFERSON BOULEVARD MIXED-USE PROJECT DRAFT EIR

Letter No.	Name	Date Received	Environmental Category				
			Air Quality/ GHG	Cultural Resources	Noise	Traffic	Other
1	State of California Department of Transportation Miya Edmonson, IGR/CEQA Acting Branch Chief District 7 Office of Transportation Planning 100 S. Main Street, MS 16 Los Angeles, CA 90012 Emily.Gibson@dot.ca.gov	6/21/2021				X	
2	Stephan Scheffler Stephen.scheffler@gmail.com	5/6/2021				X	X
3	Kelly Cohen kellyjcohen@gmail.com	5/7/2021				X	
4	Leah Lee leahlee@zoho.com	5/9/2021					X
5	Linda Shahinian 4lindashahinian@gmail.com	5/16/2021				X	X
6	Classics at Heritage Park Homeowners Association 5230 Heritage Place Culver City, CA 90230 rcochoa@bclplaw.com	5/21/2021				X	
7	Written questions from the Public Meeting on the Draft EIR	5/25/2021	X		X	X	X
8	Dr. Tom Williams Ctwilliams2012@yahoo.com	5/25/2021	X	X	X	X	X
9	Donald White and Lisa Chang 11156 Woolford Street Culver City, CA 90230 ovibose@gmail.com	6/3/2021				X	X
10	Arthur Kassan 5105 Cimarron Lane Culver City, CA 90230	6/14/2021				X	
11	Robyn Tenensap ro10@aol.com	6/16/2021	X		X	X	X
12	Temple Akiba of Culver City 5249 S. Sepulveda Boulevard Culver City, CA 90230 president@templeakiba.net	6/18/2021	X		X	X	X
13	John Yao ichiangyao@gmail.com	6/21/2021			X		
14	Katie Chau katiefchou@gmail.com	6/21/2021			X	X	
15	Khin Khin Gyi 10733 Kelmore Street Culver City, CA 90230 khin.khin.gyi10733@gmail.com	6/21/2021	X				X

Letter No.	Name	Date Received	Environmental Category				
			Air Quality/ GHG	Cultural Resources	Noise	Traffic	Other
	10733 Kelmore Street Culver City, CA 90230						
16	Laurel Busby laurelsjunk@yahoo.com	6/21/2021				X	
17	Brian Flynn Lozeau Drury LLP Sent on behalf of Supporters Alliance For Environmental Responsibility (SAFER) 1939 Harrison Street, Suite 150 Oakland, CA 94612 brian@lozeaudrury.com	6/21/2021					X
18	Komalpreet Toor Lozeau Drury LLP Sent on behalf of SAFER 1939 Harrison Street, Suite 150 Oakland, CA 94612 komal@lozeaudrury.com	6/21/2021					X
19	Wandy Sae-Tan1 heritagepark.wandy@gmail.com	6/21/2021				X	
20	Wandy Sae-Tan2 heritagepark.wandy@gmail.com	6/21/2021				X	
21	Wandy Sae-Tan3 heritagepark.wandy@gmail.com	6/21/2021					X
22	Wandy Sae-Tan4 heritagepark.wandy@gmail.com	6/21/2021				X	

Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR. As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided for comments that do not relate to environmental issues.

2.1 Topical Response to Comments

TR-1: Non-CEQA Transportation Assessment

1. Introduction

This topical response addresses comments received during the public circulation period for the Draft EIR that focused on transportation issues that are not required to be addressed under the California Environmental Quality Act (CEQA), including parking[1], level of service (LOS), congestion, and delay on surrounding roadways. The analyses of transportation issues required to

[1] Secondary physical impacts of inadequate parking may be an impact that must be analyzed under CEQA, per *Covina Residents for Responsible Dev. v. City of Covina*, 21 Cal. App. 5th 712, 729 (2018)

be addressed under CEQA were evaluated in Section 4.11, Transportation, of the Draft EIR, with supporting data provided in Appendix J, Transportation Impact Study, of the Draft EIR, which includes both CEQA and non-CEQA required analyses, in compliance with Culver City's *Transportation Study Criteria and Guidelines* (TSCG).[2]

The California Natural Resources Agency adopted the recommended Office of Planning and Research Vehicle Miles Traveled (VMT) guidelines on December 28, 2018. These guidelines were in place prior to issuance of the Notice of Preparation (NOP) circulated for the Draft EIR. The guidelines resulted in changes to Appendix G of the CEQA Guidelines that effectively removed automobile delay and associated LOS as the primary metric to evaluate transportation impacts pursuant to CEQA, and replaced it with VMT. The City of Culver City then adopted VMT as part of its CEQA transportation thresholds as a criterion to determine transportation impacts, pursuant to Senate Bill 743 (SB 743) and recent changes to CEQA Guidelines Section 15064.3. Therefore, as further described below, the Draft EIR analysis of transportation was focused on VMT and other analyses reflected in Appendix G of the CEQA Guidelines, with transportation analyses not required to be addressed under CEQA presented in Appendix J, Transportation Impact Study, of the Draft EIR.

2. CEQA Transportation Analysis Requirements

As explained in subsection 4.11.3, in Section 4.11, Transportation, of the Draft EIR, SB 743 directed the Office of Planning and Research (OPR) to develop revisions to state CEQA Guidelines to establish new criteria for determining the significance of transportation impacts and define alternative metrics to the metrics used for traffic LOS. Subsequent related changes to CEQA requirements for transportation impact analyses included elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. The updates to the state CEQA Guidelines establish VMT as the primary metric for evaluating a project's environmental impacts on the transportation system. These changes to the way transportation impacts are assessed under CEQA were made to help ensure new development projects are built in a way that promotes options that would result in Californians driving less, while promoting: achievement of climate and environmental goals; health and safety for residents; quality of life; and, economic growth by co-locating jobs, services, transit, and housing.

As described in subsection 4.11.4, in Section 4.11, Transportation, of the Draft EIR to evaluate transportation impacts, trip generation and VMT were determined for residents and employees. As presented in Section 4.11, Transportation, of the Draft EIR, the following thresholds of significance were used to assess the transportation impacts of the Project under CEQA:

TRAF-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities

[2] City of Culver City, Transportation Study Criteria and Guidelines, July 12, 2020, https://www.culvercity.org/files/assets/public/documents/public-works/mobility/transportation-study-criteria-and-guidelines.pdf, accessed July 7, 2021.

TRAF-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

This is interpreted by the City of Culver City via the adopted TSCG to be daily VMT per capita exceeding 15% below existing average daily household VMT per capita in Culver City for residential projects, daily work VMT per employee exceeding 15% below the existing average daily work VMT per employee in Culver City for office projects, or any net positive change to citywide VMT in Culver City for regional retail projects. Regional retail projects are defined as having at least 50,000 square feet in size at a single store.

TRAF-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

TRAF-4 Result in inadequate emergency access

Pages 4.11-16 through 4-11.23 in Section 4.11, Transportation, of the Draft EIR provide an analysis of the Project's impacts based on the aforementioned thresholds of significance, and identified one significant impact associated with the office use's daily work VMT per employee. Accordingly, a mitigation measure focused on a Transportation Demand Management (TDM) is provided on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR which would reduce the Project's VMT impact to a less than significant level.

3. Non-CEQA Transportation Analysis Requirements

Several Draft EIR comments relate to parking, LOS, congestion, and delay on surrounding roadways. Based on SB 743 and Culver City TSCG guidance, parking, LOS, congestion, and delay effects are no longer considered impacts on the environment and therefore such effects were not evaluated in Draft EIR. As such, responses to comments on these issues are not required to be provided in this Final EIR and are only provided for informational purposes independent of CEQA requirements. These issues were, however, discussed in the non-CEQA portion of Appendix J, Transportation Impact Study, of the Draft EIR.

The City, through their TSCG, continues to require that transportation impact studies analyze various non-CEQA transportation topics, such as intersection and roadway segment LOS and delay, intersection queuing, parking, construction period traffic, site plan review, multimodal safety, and transit operations. The City's TSCG also establishes various criteria for these analyses where corrective actions may need to be further studied under a non-CEQA context. The results of these analyses of non-CEQA topics and the proposed corrective actions identified in Appendix J, Transportation Impact Study, of the Draft EIR, would be addressed through either, Project conditions of approval, fair share payment of Mobility Improvement Fees to support mobility improvements in the City, and, potentially other requirements.

2.2 Responses to Individual Comments

Responses to individual comments are included on the following pages.

Letter 1

State of California
Department of Transportation
Miya Edmonson IGR/CEQA Action Branch Chief
District 7 Office of Transportation Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

Emily.Gibson@dot.ca.gov

Email received on June 21, 2021

Comment 1-1

For your records, the attached letter is Caltrans District 7's response to the following project: **SCH # 2020090329, 11111 Jefferson Boulevard Mixed-Use Project**. The Lead Agency under CEQA, which is the City of Culver City, is CC'ed on this email.

Please let me know if you have any questions or need anything else from me.

Response to Comment 1-1

Responses to the referenced letter are provided below in Response to Comments 1-2 through 1-5.

Comment 1-2

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Project would construct 230 residential dwelling units, 19 of which would be affordable to very low-income households, for a total of 244,609 square feet (sf) of residential area. It would also feature 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants, and a 1,950 sf gym/studio fitness center. In addition, the project would contain 11,450 sf of second floor office uses. The five-story building would be constructed on top of one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. In total, there would be 653 parking stalls. The City of Culver City is the Lead Agency under the California Environmental Quality Act (CEQA).

The DEIR states that primary regional access to the project site is provided by the San Diego Freeway (I-405) as well as the Marina Freeway/Expressway (SR-90), which are both located approximately 0.7 miles southwest of the site. From reviewing the DEIR, Caltrans has the following comments.

Response to Comment 1-2

The introductory comment is noted.

Comment 1-3

We support the implementation of Mitigation Measure (MM) TRAF-1, which is a Transportation Demand Management (TDM) Program, to reduce this project's Vehicle Miles Traveled (VMT) impacts from office uses. We also support the implementation of the voluntary TDM measures proposed by the applicant, but not part of the TDM program and thus not conditioned as requirements for approval of project entitlements.

To further reduce the VMT impacts of this project, Caltrans suggests including the voluntary TDM measures into the TDM Program (i.e., MM TRAF-1), so that the voluntary TDM measures become requirements for approval of project entitlements. We also suggest including a measure in the TDM program to reduce the number of parking spaces from 653 to 625, which is the minimum required according to Appendix J. This would ensure that VMT would not be induced from providing additional parking.

Response to Comment 1-3

The comment indicates support for the TDM measures included in Mitigation Measures TRAF-1 and the proposed voluntary TDM measures to reduce the Project's VMT. The proposed voluntary TDM measures described on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and on page 14 in Appendix J, Transportation Impact Study, of the Draft EIR will be included in the Project's conditions of approval. The Project would also prepare a TDM Program to be completed prior to occupancy.

With regard to reducing the number of parking spaces, parking on its own is not considered a CEQA issue, but it is understood that providing less parking has the potential to reduce VMT. The Project is proposing to provide 14 parking spaces in the residential garage beyond California Government Code requirements applicable to density bonus projects pursuant to California Government Code Section 65915, 14 parking spaces for retail uses in the commercial garage beyond City of Culver City code requirements, and City of Culver City code required minimum parking for the office uses. Reducing parking supply is an approved TDM measure to reduce residential home-based VMT for the purposes of CEQA in the Culver City VMT Tool. However, this TDM measure was not proposed because the Project would not exceed the City's established threshold for household VMT per capita for residential uses and therefore the Draft EIR determined that there would be no significant impact for the residential uses (refer to page 4.11-21 in Section 4.11, Transportation, of the Draft EIR). With regard to the retail uses, the Draft EIR determined that there would no significant impact would occur and, as such, no mitigation measures were required. For the office use, the Draft EIR determined that there would be a significant impact, and the mitigation proposed would charge office use employees to park at the Project Site; as such, no additional mitigation measures are required. Nonetheless, this suggestion will be provided to the decision-makers for their consideration.

Comment 1-4

In addition, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports the following statement: "construction equipment delivery would be scheduled to avoid peak traffic hours." We recommend that the project limit all construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit the Construction Management Plan detailing these issues for Caltrans' review.

Response to Comment 1-4

The Project will comply with all relevant local and state regulations regarding the transport of equipment and materials during the construction phase, including Caltrans transportation permits. According to Project Design Feature TRAF-1, as shown on page 4.11-14 in Section 4.11, Transportation, of the Draft EIR, the Project will create a Final Construction Management Plan that will define the scope and scheduling of construction activities. The Final Construction Management Plan (FCMP) would strive to limit use of the public right-of-way during peak traffic periods, but exact details would be finalized during the preparation of the plan. It is not anticipated that Project construction traffic will cause issues on any State facilities.

Comment 1-5

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03580.

Response to Comment 1-5

The concluding comment is noted.

Letter 2

Stephen Scheffler
Stephen.scheffler@gmail.com

Email received on May 6, 2021

Comment 2-1

I have been wondering what was going to happen with this project. This is going to profoundly impact the immediate area in a negative way. I live at 5452 Kinston Ave and know this neighborhood intimately. Two issues are of great significance:

Response to Comment 2-1

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 2-2 through 2-4.

Comment 2-2

1 – Traffic increase is going to add to what is already a lot of congestion.

Traffic impact is described as:

"The Project would represent an urban infill development, since it would be undertaken on a currently developed property, and would be located near existing public transit stops, which would result in reduced vehicle trips and VMT compared to model default assumptions. The MOU120 includes transit credit from public transit stops in the form of 5 percent reduced trips compared to default trips rates in the Institute of Transportation Engineers, Trip Generation, 10th Edition. An additional 10 percent reduction was applied to new net trips internal capture due to the mixed-use nature of the Project." (Project Characteristics and Project Design Features; 4.1-38)

To assume vehicle trips would be reduced due to public transportation stops being near the site is absurd. This is Los Angeles. I have ridden the buses that go through this area. The people who ride buses do not typically have cars. Proximity to bus stops does not result in car drivers choosing to use buses instead of their cars. The increase in vehicles of visitors to and residents of the site will greatly add to an already busy set of heavily travelled streets.

Response to Comment 2-2

Transportation impacts were addressed in Section 4.11, Transportation, of the Draft EIR, with supporting information and non-CEQA analysis provided in Appendix J, Transportation Impact Study, of the Draft EIR. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. Trip generation credits as shown for the purposes of the peak period operations analysis are not part of CEQA analyses or factored into thresholds of significance. Nonetheless, the comment claims that

proximity to bus stops does not result in car drivers choosing to ride transit. As part of the non-CEQA analysis and as shown on page 34 in Appendix J, Transportation Impact Study, of the Draft EIR, a 5 percent transit credit was applied to the standard vehicle trip generation rates from the Institute of Transportation Engineers (ITE) when developing the Project's trip generation estimates. This is considered appropriate and conservative given outputs from the MXD 2.0 Mixed-Use Trip Generation Methodology, nearby transit ridership, and adopted Culver City Transportation Study Criteria and Guidelines, and considering that the standard ITE rates reflect more suburban locations. As shown on Figure 3 in Appendix J, Transportation Impact Study, of the Draft EIR, there were more than 2.5 million passenger boardings for Culver City Bus Routes 6 and 6R along Sepulveda Boulevard in 2019, and it is reasonable to assume some level of transit ridership by residents, employees, and visitors to the Project, whether or not they own cars.

Appendix J, Transportation Impact Study, of the Draft EIR acknowledged that the Project would add vehicle traffic to the surrounding street system. In response, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, pay a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 2-3

2 - Where is the Post Office going to be relocated to? The Draft EIR states:

"However, as the United States Post Office has indicated it plans to move locations, the United States Post Office building is assumed to move at some point in the future and remain vacant until such time it is occupied by another commercial or industrial use, which may be difficult given the unique aspects of the building's form and potential lack of suitability for another use." (ES.4.1 Alternative 1: No Project)

That is a very vague statement concerning the future of an extremely important resource in this general area. The next Post Office for customers of this general area will be more restricted and less accessible.

Response to Comment 2-3

The comment regarding the new location of the Post Office is noted, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted. The United States Postal Service can be contacted regarding any current plans for replacement of the Post Office or its associated services.

Comment 2-4

Should the 11111 Jefferson project go forward as the developers hope, I believe the result will be a further degradation in the urban fabric of this area. I hope to make my thoughts known at the upcoming meetings.

Response to Comment 2-4

This comment is noted and will be provided to the decision-makers for their consideration. Because the comment does do not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Letter 3

Kelly Cohen
kellyjcohen@gmail.com

Email received on May 7, 2021

Comment 3-1

My question is I am concerned that there is not a dedicated bike lane that will be on the Jefferson side of the complex. I commend the installation on the Sepulveda side, but one also needs to be installed on the Jefferson side.

Response to Comment 3-1

Transportation impacts, including analysis of bicycle facilities, were addressed in Section 4.11, Transportation, of the Draft EIR, with supporting information and non-CEQA analysis provided in Appendix J, Transportation Impact Study, of the Draft EIR. Refer to page 4.11-19 in Section 4.11, Transportation, of the Draft EIR for a review of compliance of the Project with the Culver City Bicycle & Pedestrian Action Plan (BPAP). Under Threshold TRAF-1, the Project would not conflict with or preclude the implementation of the Culver City BPAP. Although the Project does not plan to install bicycle lanes on Jefferson Boulevard along its frontage, Jefferson Boulevard north of Sepulveda Boulevard is proposed to have bicycle facilities installed as part of the BPAP, as indicated on pages 4.11-7 and 4.11-8 in Section 4.11, Transportation, of the Draft EIR. The Project would not preclude a potential future City project to install bicycle facilities on Jefferson Boulevard, and is not proposing any driveways that could conflict with such facilities. Also note, as stated on page 4.11-13 and page 4.11-14 in Section 4.11, Transportation, of the Draft EIR, that the Project includes other bicycle facilities in addition to the Sepulveda Boulevard bike lane abutting Sepulveda between Machado Road and Jefferson Boulevard, including, a public bike share station, and payment of a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

Comment 3-2

As a parent of a child that attended El Marino Elementary School, and lives in the Lindberg Park area, this is needed for the safety of the community. Culver City has been wanting to expand biking access in the community and this would be a missed opportunity if one is not installed.

As an adult that regularly bikes to work, in areas without bike lanes it is extremely dangerous especially during rush hour.

Response to Comment 3-2

Refer to the Response to Comment 3-1, above, regarding Project bicycle provisions and how the Project would not prevent the implementation of the bicycle lanes on Jefferson Boulevard proposed in the Culver City Bicycle & Pedestrian Action Plan. Also, regarding safety concerns, also note, as discussed on page 4.11-20 in Section 4.11, Transportation, of the Draft EIR, that the Project includes features that would improve safety on surrounding streets, including reducing the number of driveways and curb cuts on the Project Site from 10 to three. The removal of driveways would improve traffic flow and reduce vehicle conflicts and interference with pedestrian and bicycle activity around the Project Site. The Project would also introduce a new signalized crosswalk across Sepulveda Boulevard at Janisann Avenue. This new crossing would shorten crossing distances and provide a safer signalized and marked crossing.

Letter 4

Lea Lee
leahlee@zoho.com

Email received May 9, 2021

Comment 4-1

Mr. Allen – Please know that I am extremely excited about this possible development. I live on Stever Street, right behind the Pavillion's on Jefferson, and this building will be a welcome addition to our little section of Culver City.

I love that there are three access points for parking. I would like to see more low-to-moderate housing units included as part of this project.

This building is a chance to add some actual, intentional (and hopefully beautiful) architecture to the City as opposed to the horrible strip-mall buildings that currently line Sepulveda.

Response to Comment 4-1

This comment in support of the Project is noted. As indicated in Chapter 2, Project Description, of the Draft EIR, of the 230 residential dwelling units proposed by the Project, 19 units are slated as affordable to very low income households. Regarding the interest in seeing more low to moderate housing units included in the Project, the comment is noted and will be provided to the decision-makers for their consideration. As noted further in Section 4.9, Population and Housing, of the Draft EIR, the Project would support and not conflict with relevant goals, objectives and policies of the Culver City General Plan for increasing the supply of housing and affordable house through the use of State and local incentives.

Letter 5

Linda Shahinian
4lindashahinian@gmail.com

Email received May 16, 2021

Comment 5-1

Will there be a left turn into the project from Machado, approaching from Jefferson? If not, will southbound Jefferson traffic turn onto Sepulveda (at Jiffy Lube) to enter the project at Janisann?

Response to Comment 5-1

Page 4.11-12 in Section 4.11, Transportation, and page 59 in Appendix J, Transportation Impact Study, of the Draft EIR, describes the available turning maneuvers into and out of the Project Site. As stated therein, left-turn pockets will be provided from Machado Road into the commercial driveway west of Jefferson Boulevard and into the residential driveway farther to the west. Traffic on southbound Jefferson may also turn right onto northbound Sepulveda, where additional Project Site access is available at Janisann Avenue. Also note that refinements to the Project's proposed turning movements along Machado Road have been made, these changes have been incorporated into Chapter 3, Revisions, Clarifications, and Corrections to the Draft EIR, in this Final EIR.

Comment 5-2

PS, is "Current Planning Manager" an interim position formerly known as "Acting?" Is it a consulting rather than staff position?

Response to Comment 5-2

The comment regarding "Current Planning Manager" is noted, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted.

Letter 6

Richard C. Ochoa
President and Member of the Board of Directors
Classics at Heritage Park Homeowners Association
5230 Heritage Place
Culver City, CA 90230

rcochoa@bclplaw.com

Email received May 21, 2021

Comment 6-1

Hi Heba and hope you this email finds you healthy and safe. I am the President and member of the Board of Directors of the Classics at Heritage Park Homeowners' Association.

Last week our community members had a follow-on Zoom meeting with 3MR Capital representatives regarding the proposed 11111 Jefferson Boulevard development. From 3MR's presentation, we have some continuing concerns and questions regarding the ongoing configuration plan for Machado Road and for Jefferson Avenue leading to the Project site, as well as the impacts to our community, from our prior 2020 December Zoom meeting 3MR. In response to my questions on these issues, Rupesh Bhakta of 3MR thought these were best directed to Michael Allen and you.

Following my email exchange with Michael, I had an initial call with him yesterday, so he is now conversant with those issues.

Response to Comment 6-1

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 6-2 through 6-6.

Comment 6-2

In prior public meetings regarding this proposed development, separate meetings with 3MR and other developers reps, and emails to the City, I and other of our HOA members have voiced ongoing concerns the need to coordinate the design of Machado Road so that existing, independent left turn lane into our community remain as is, with an portion of the existing median to remain to prevent cut through traffic through our family community with many young children. In all of those prior meetings, developer project illustrations, and communications, the proposed entrance to the residential portion of the Project has been depicted as showing a right turn access into the underground parking from Machado/Sepulveda, and a right turn exit from that entrance onto Machado towards Jefferson only, with a relevant portion of the existing median remaining to prevent any direct crossing access to/from the residential parking entrance into our community.

In last week's meeting with 3MR, however, for the first time some illustrations were shown to envision an open and shared suicide lane (which mind you is already on a highly curved portion of Machado) which appears to enable left turn access from and to Machado from the residential entrance, as well as to permit cut through into our community. What is also shown is a proposed island on the stamped concrete portion of the entrance in our community property that has no dimensions, but also does not eliminate cut through traffic. What is also shown is the elimination of a portion of the existing median on Machado towards Jefferson the second retail entrance to facilitate backing up movements of delivery trucks entering/exiting the loading dock area, but with no provision to eliminate cars using this area for U-turns. Also related to these issues are increased cut through traffic from the Jefferson/Ballona Lane entrance to our community and increased parking by retail/commercial invitees of the Project or guests of the Project's residents on our private community streets which our HOA maintains and which are already less than sufficient for our owners. These are serious impacts and access conflicts for our community which also have the clear potential for vehicle collisions, and attendant property damage and personal injury.

Response to Comment 6-2

Cut-through traffic and parking are not considered as CEQA issues. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. The comment also references the safety risks and potential for collisions. Pages 4.11-21 and 4.11-22 in Section 4.11, Transportation, of the Draft EIR, discuss the safety of the driveways. As discussed therein, the Project would not substantially increase hazards or conflicts due to a geometric design feature under Threshold TRAF-3. All Project driveways as originally proposed would be designed to comply with City standards, provide adequate sight distance, and protect safety for all roadway users. Therefore, impacts were found to be less than significant.

Nevertheless, in response to the concerns raised in the letter, these comments were discussed with City staff and Richard Ochoa, representative of The Classics at Heritage Park Homeowners Association (HOA), during a meeting held and recorded at 4:00 P.M. on June 16, 2021. As a result of this meeting, it was agreed that the Project would construct a raised median on Machado Road in a manner to preserve left-turn access from eastbound Machado Road into the Heritage Park neighborhood and provide left-turn access from westbound Machado Road into the Project Site for residents, while physically separating the opposing left-turn pockets and physically prohibiting through and left-turning movements from either Heritage Place or the Project's residential driveway at Machado Road. **Figure 2.2-1**, *Machado Road Median Concept,* illustrates the concept for this median island. Vehicles exiting the Project residential driveway would be required to turn right onto eastbound Machado Road. Other measures such as signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions, including U-turn prohibitions on Machado Road. The Project would also install a raised curb extension at the intersection of Ballona Lane and Jefferson Boulevard that would prohibit any entry except for emergency vehicles into the Heritage Park neighborhood from Jefferson Boulevard, and only allow for eastbound right-turns from Ballona Lane out of the neighborhood. **Figure 2.2-2**, *Ballona Lane Access Restriction Concept,* illustrates the concept for this closure. The exact dimensions and design of these features at the entrances to the Heritage Place community would be determined

during the preparation of construction plans and will be approved by the City. These changes and refinements to access provisions are now reflected in Chapter 2, Project Description, of the Draft EIR, as shown in Section 3, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. These changes do not alter the impact findings in the Draft EIR or result in any new or substantially more severe significant impacts, as the revised Project driveways would also be designed to comply with City standards, provide adequate sight distance, and protect safety for all roadway users.

The Project also proposes to provide parking for residents, employees, and visitors to the Project Site in compliance with City code (retail and office) and State law (residential), including parking for residential guests which is not required per State law. Parking would be free for visitors, which would discourage parking in other areas off-site. Refer to Response to Comment 10-4 for additional information regarding Project parking.

Comment 6-3

So with this background please consider this email a formal request on behalf of our HOA community that the Project Team as part of the EIR and approval of Project conditions process:

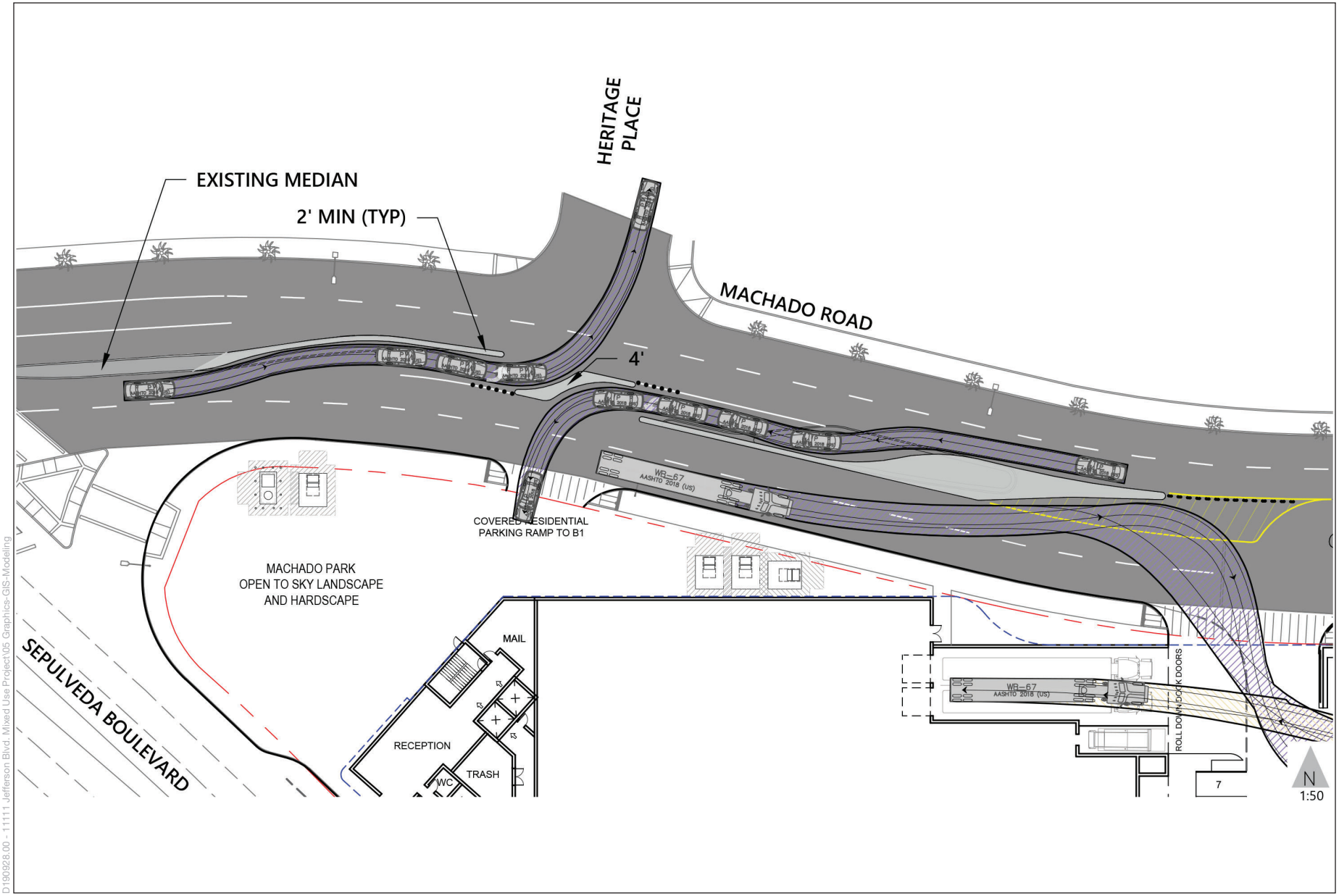
1. Explore and re-design Machado Road to (a) eliminate the proposed open and shared suicide lane as described above; (b) preserve the separate existing left turn lane into the Classics community which is bordered by the existing median and a series of yellow barrier poles; (c) relocate and redesign the proposed left turn lane into the Project's residential parking entrance and perhaps moving that entrance itself so that it exists as a separate left turn lane, there is a physical and raised concrete median barrier from the separate left turn lane for the Classics, and eliminates the ability for the Project residents to dangerous cut across Machado into our community for cut through purposes or to make an equally dangerous left turn northbound onto Machado.

Response to Comment 6-3

Refer to Response to Comment 6-2, above.

Comment 6-4

2. Design and fund an [sic] sufficient extension of the raised pedestrian sidewalk and curb at Jefferson and Ballona Lane so that there is only a right turn exit from Ballona Lane onto Jefferson, but no longer permits a right turn entry from Jefferson onto Ballona Lane (but which can still be traversed by emergency trucks). With the proposed redesign of #1 above, this will go a long way to eliminate/greatly disincentivize (a) cut through traffic into our community by vehicles wanting to avoid the Jefferson/Machado intersection and access either the Project's residential parking entrance or northbound travel on Sepulveda, and (b) parking on the private streets in our community that our HOA pay to maintain by the retail/commercial invitees of the Project or guests of the Project's residents



D190928.00 - 11111 Jefferson Blvd. Mixed Use Project\05 Graphics-GIS-Modeling

SOURCE: Fehr & Peers, 2021

11111 Jefferson Boulevard Mixed-Use Project

Figure 2.2-1
Machado Road Median Concept

ESA

D190928.00 - 11111 Jefferson Blvd. Mixed Use Project\05 Graphics-GIS-Modeling

SOURCE: Fehr & Peers, 2021

11111 Jefferson Boulevard Mixed-Use Project

Figure 2.2-2
Ballona Lane Access Restriction Concept

ESA

Response to Comment 6-4

Refer to Response to Comment 6-2, above.

Comment 6-5

3. Explore and redesign/preserve the existing center median on Machado Road as much as possible towards Jefferson that will prevent U-turns on Machado but still permits the delivery truck movements needed for right turn entry into the loading dock entrance on further south on Machado towards Jefferson.

Response to Comment 6-5

Refer to Response to Comment 6-2, above.

Comment 6-6

I'd like to schedule a mutual time to discuss these issues/requests with you and Michael further (who I've copied on this email). Please reply and give some options that work for you on Monday, or later today if you are available. Thanks in advance.

Response to Comment 6-6

Refer to Response to Comment 6-2, above. A meeting was held with the City of Culver City and Richard Ochoa, representing The Classics at Heritage Place Homeowners Association, at 4:00 P.M. on June 16, 2021.

Letter 7

Comments provided below are written questions, as submitted, provided by participants of the Public Meeting on the Draft EIR held via Zoom on May 25, 2021. A table consisting of the comments is provided in Appendix A, Original Comment Letters, of this Final EIR.

Comment 7-1

Anonymous Attendee: Why is the City going with a billionaire development company from Illinois? What is the City getting from the John Buck Co. for developing this area?

Response to Comment 7-1

The comment regarding the applicant is noted and will be provided to the decision-makers for their consideration, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted.

Comment 7-2

Kimberly Ferguson: Several of the EIR assessments which you state will have no impact, I believe will most definitely have significant impact and require mitigation and consideration. Those categories are: Air Quality, Geology andd [sic] Soil, Noise, Public Utilies [sic] and Greenhouse gas. Also, what about Earthquake concerns in the design and for emergency access and evacuation....what will be done about these?

Response to Comment 7-2

Air quality, GHG, noise, and emergency access, were addressed in Section 4.1, Air Quality, Section 4.5, Greenhouse Gas Emissions, Section 4.8, Noise, Section 4.10.1, Public Services – Fire Protection, and Section 4.10.2, Public Services – Police Protection, of the Draft EIR. As noted in Chapter 6, Other CEQA Considerations, of the Draft EIR, geology and soils and utilities and service systems were evaluated in Appendix A-2, Initial Study, of the Draft EIR.

The comment suggests that impact analyses of the cited topics in the Draft EIR were erroneous, but it does not specify how. The following clarifications are provided based on the content in the Draft EIR.

Regarding air quality, refer to the analyses provided in Section 4.1, Air Quality, of the Draft EIR, which found that the Project would have significant air quality impacts and would require mitigation measures.

Regarding GHG emissions, refer to the analyses provided in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR, found that the Project's impacts would be less than significant, therefore, no mitigation measures were required.

Regarding noise, refer to the analyses provided in Section 4.8, Noise, of the Draft EIR, which found that the Project would have significant construction noise impacts and would require mitigation measures.

Regarding emergency access, refer to Section 4.10.1, Public Services – Fire Protection, and Section 4.10.2, Public Services – Police Protection, of the Draft EIR. As indicated therein, impacts were found to be less than significant and no mitigation measures were required. Also refer to Appendix A-2, Initial Study, of the Draft EIR, and the analysis provided on pages B-23 through B-24, which finds that Project impacts associated with emergency evacuation would be less than significant. Therefore, no mitigation measures were required.

Regarding geology and soils, refer to Appendix A-2, Initial Study, of the Draft EIR, and the analysis provided on B-16 through B-20, which shows that the Project would have less than significant impacts on this topic, except regarding impacts on paleontological resources, which were addressed in Section 4.4, Geology and Soils – Paleontological Resources, of the Draft EIR. Impacts on paleontological resources were determined to be significant and mitigation measures were provided in this section of the Draft EIR.

Regarding public utilities, refer to Appendix A-2, Initial Study, of the Draft EIR, and the analysis that shows that the Project would have less than significant impacts on utilities and service systems. Therefore, this topic was not carried forward for further analysis in the Draft EIR, and no mitigation measures were required.

Comment 7-3

Arthur Kassan: According to page 55 of the Transportation section, five intersections will have significant traffic queuing impacts. That confirms the intuitive opinions of many citizens. No mitigation ("corrective") measures are proposed. Does that mean that the severe congestion will just have to be accepted?.

Response to Comment 7-3

LOS is no longer being used as a metric to determine significant impacts or proposed mitigation measures. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR, with supporting data and non-CEQA analysis provided in Appendix J, Transportation Impact Study, of the Draft EIR. Contrary to the comment, the transportation analyses of the Draft EIR did not identify a significant traffic queuing impact pursuant to CEQA thresholds of significance, therefore, no mitigation measures were warranted or proposed.

Appendix J, Transportation Impact Study, of the Draft EIR, acknowledged that the Project would add vehicle traffic to the surrounding street system. Page 55 in Appendix J, Transportation Impact Study, of the Draft EIR explains that the Project would result in intersection queuing conditions under a non-CEQA context, but this would not be considered a significant impact under CEQA. In response, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and

VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, payment of a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 7-4

Michael Laase: Will the park be private or be ran through the Culver City Park & Rec Depart? Not sure is it would be a safe place for children to play. Will the park have a Parks & Rec employee on duty during park hours?

Response to Comment 7-4

Machado Park and safety related issues are addressed in Chapter 2, Project Description, of the Draft EIR. As described on page 2-17 in Chapter 2, Project Description, of the Draft EIR, Machado Park, would be publicly accessible but privately maintained, and is expected to include such amenities as a children's play area, and terraced landscaping and seating. It will not be operated by the City Parks and Recreation Department and the department will not have employees on duty at the park. Regarding safety concerns, as stated on page 2-24 in Chapter 2, Project Description, on-site security is planned to ensure that open spaces, including Machado Park, are used for their intended purpose. Site security would include the provision of 24-hour video surveillance and roving security personnel. Project design would also include lighting of entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes. Regarding security concerns, also refer to Section 4.10.2, Public Services-Police Protection, of the Draft EIR. Specifically refer to page 4.10.2-8 in Section 4.10.2, Public Services-Police Protection, of the Draft EIR and Project Design Feature, PDF-POL-2 Project Site Security and Access during Operation. Also note that impacts on police protection were determined to be less than significant.

Comment 7-5

Kimberly Ferguson: Can this presentation be downloaded into the chat so that we can download it?

Response to Comment 7-5

The comment regarding the Draft EIR Public Meeting presentation does not raise a substantive issue on the content of the Draft EIR. However, as noted during the public meeting, a recording of the presentation was uploaded to the City's website. See https://www.culvercity.org/City-Projects/G-Planning-Projects.

Comment 7-6

Jon Graff: Was a revised traffic study done when the programming was more complete?

Response to Comment 7-6

Appendix J, Transportation Impact Study, of the Draft EIR, assumes the full project description as proposed and provided in Chapter 2, Project Description, of the Draft EIR.

Comment 7-7

Robin Turner: Since the city is considering getting rid of single family zoning to allow for more denser housing, why don't you take out the housing on this project and make it a two story retail project instead? That way the project won't be that damaging to the existing residential area and it will benefit the people in culver city and give another option for development.

Response to Comment 7-7

Alternatives to the Project were evaluated in Chapter 5, Alternatives, of the Draft EIR. Refer to the discussion on page 5-7 in Chapter 5, Alternatives, of the Draft EIR, under the heading Alternatives Considered and Rejected, subheading 5.6.2, Commercial Use Alternative. As further stated therein, developing the Project Site solely with commercial uses was not analyzed as an alternative as it would not meet the underlying purpose and primary objective of the Project to develop the Project Site with a mixed-use development that includes residential uses, and would not meet most of the Project's basic objectives. Furthermore, as also stated therein, a commercial only alternative would, similar to the Project, still include the same construction related impacts that would occur under the Project, and would not eliminate, and could increase the significant VMT impact associated with the Project's office uses. Accordingly, a commercial-only alternative would not reduce impacts, and for this additional reason was not carried forward for further analysis.

Comment 7-8

Anonymous Attendee: Was this study conducted during the pandemic when the community was confined to thier [sic] homes?

Response to Comment 7-8

Transportation impacts were addressed in Section 4.11, Transportation, of the Draft EIR, with supporting information and non-CEQA analysis provided in Appendix, J, Transportation Impact Study, of the Draft EIR. As stated on page 4.11-10 in Section 4.11, Transportation, of the Draft EIR, the traffic count data used with the VMT Calculator was collected in 2019 prior to the COVID pandemic. More specifically, the non-CEQA analyses in Appendix, J, Transportation Impact Study, of the Draft EIR, used data and counts collected in the Spring and Fall of 2019, prior to the pandemic. These data were collected during weekday A.M. and P.M. peak periods when all local schools were in session.

Comment 7-9

Dr. Tom Williams: Have the Overland and Charnock Faults been reviewed and assessed?

Response to Comment 7-9

Impacts to geology and soils were evaluated in Appendix A-2, Initial Study, of the Draft EIR. As discussed therein, starting on page B-17 in Appendix A-2, Initial Study, of the Draft EIR, the nearest fault zone to the Project Site is the Newport Inglewood Fault Zone is located approximately 1.5 miles east of the Project Site. In addition, the Overland Avenue Fault is located approximately 2,000 feet east of the Project Site, along Overland Avenue. It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault. As such, the potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered low. While the Charnock Fault was not considered and assessed as part of the Initial Study analysis, the Charnock Fault is located over 1 mile to the west of the Project Site, and similar to the Overland Avenue Fault and Newport Inglewood Fault Zone, potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered low. Page B-16 in Appendix A-2, Initial Study, of the Draft EIR, further details regarding geology and soils are provided in the Report of Geotechnical Engineering Services (Preliminary Geotechnical Report), dated April 19, 2019, prepared by GeoDesign, Inc. which is available for review at the Culver City Planning Division.

Comment 7-10

Vicky Foxworth: When will contsructio [sic] start and how long will it take?

Response to Comment 7-10

The time frame for construction was discussed on pages 2-24 and 2-25 in Chapter 2, Project Description, of the Draft EIR. As further stated therein, construction is anticipated to commence as early as the second quarter of 2022 and be completed by the third quarter of 2024 for an anticipated duration of 26 months.

Comment 7-11

Brian Sowell: How is it possible that adding 230 units, with people going to work in the morning and coming home at night, will not have a significant negative impact on the traffic problems that already exist (certainly pre-Covid) on Sepulveda and Sawtelle?

Response to Comment 7-11

This comment focuses on general concerns regarding worsening of traffic congestion in the area with development of the Project. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR and was based on Appendix J, Transportation Impact Study, of the Draft EIR. According to the

Draft EIR on page 4.11-21 in Section 4.11, Transportation, of the Draft EIR, the Project would result in a daily work VMT/employee significant impact. This impact was fully mitigated with implementation of Mitigation Measure TRAF-1, as provided on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR.

Appendix J, Transportation Impact Study, of the Draft EIR acknowledged that the Project would add vehicle traffic to the surrounding street system. Pages 46 and 51 in Appendix J, Transportation Impact Study, of the Draft EIR explains that the Project would increase delay at studied intersections under a non-CEQA context, but this would not be considered a significant impact under CEQA. In response, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, payment of a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 7-12

Michelle Dicker: Why does the EIR state that their [sic] will be no traffic impact? The current situation is terrible especially at Sepulveda and Jefferson. How will the increase in traffic be managed? Are their specific mitigation plans?

Response to Comment 7-12

This comment focuses on general concerns regarding worsening of traffic congestion in the area with development of the Project. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR, and was based on Appendix J, Transportation Impact Study, of the Draft EIR. According to the Draft EIR on page 4.11-21 in Section 4.11, Transportation, and substantiated in Appendix J, Transportation Impact Study, of the Draft EIR, the Project would result in a daily work VMT/employee significant impact. This impact was fully mitigated with implementation of Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR.

Appendix J, Transportation Impact Study, of the Draft EIR, acknowledged that the Project would add vehicle traffic to the surrounding street system. Pages 46 and 51 in Appendix J, Transportation Impact Study, of the Draft EIR explains that the Project would increase delay at studied intersections under a non-CEQA context, but this would not be considered a significant impact under CEQA. In response, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is

consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, payment of a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 7-13

Brian Sowell: How can adding a 5 floor structure in the middle of an area of 1-2 stories not have a significant negative aesthetic impact, changing the community that we all chose to live in?

Response to Comment 7-13

Impacts on aesthetics were addressed in Appendix A-2, Initial Study, of the Draft EIR. As discussed on pages B-1 through B-3 in Appendix A-2, Initial Study, of the Draft EIR, there are no scenic vistas across the Project Site that would be effected, therefore, no significant impacts on scenic vistas were identified. In addition, the Project would not substantially damage any scenic resources within a state scenic highway, therefore, no significant impacts on scenic resources were identified. As discussed on pages B-2 through B-3 in Appendix A-2, Initial Study, of the Draft EIR, with regard to the Project conflicting with applicable zoning or other regulations governing scenic quality, impacts were found to be less than significant. The analysis indicates that the Project Site is developed with a mix of aging commercial development and surface parking, and currently has low scenic quality. As the Project would replace such improvements with unified high quality architecture and landscaped open space areas, including Machado Park, it would not conflict with City plans and regulations governing scenic quality, and impacts associated with public views. Therefore, although the Project would represent more intensive development of the Project Site than under existing conditions, and would include buildings of greater height than nearby development, aesthetic impacts were determined less than significant in the Initial Study.

Also refer to the discussion provided on page 4.7-21 and 4.7-22 in Section 4.7, Land Use and Planning, of the Draft EIR. As further discussed therein, lower levels of the building would be designed to provide a human-scale with entryways and windows, and that the buildings would have vertical and horizontal breaks that would serve to break up the mass of the structures as shown in the renderings provided in Chapter 2, Project Description (refer to Figures 2-8 and 2-10). Building heights would vary with a lower portion in the center serving to provide a more human scale building at the Entry Courtyard. In addition, the provision of three distinct publicly accessible open space areas results in larger building setbacks at these locations, which also serve to break up the mass of the building and provide focal points and gathering place as well as visual interest. Thus, the Project would improve the visual character of the area through the site plan and building design and would create connections with the surrounding urban environment. For the reasons stated above, and based on other analysis included in Section 4.7, Land Use and Planning, of the Draft

EIR, the Project was determined to not conflict with relevant land use plans, and land use impacts were determined to be less than significant. Also refer to Response to Comment 7-23,below.

Comment 7-14

Kimberly Ferguson: My concern is after the final completed project as well. [sic] and This [sic] building and its residents will effect and impact on the peaceful enjoyment of residence and those travelling through this area.

Response to Comment 7-14

The comment regarding the peaceful enjoyment of the residences and those travelling through the Project area is noted and will be provided to the decision-makers for their consideration, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted. Note that the Draft EIR found that the Project would have less than significant operational impacts, with or without mitigation, for the topics that were analyzed in the Draft EIR, including air quality, noise, and transportation, among others.

Comment 7-15

Katie Chou: The current site layout along Mechado is unsafe. It also unfairly pushes all queueing traffic to Mechado. Which party (developer or City) is responsible for a safe Mechado Rd layout (including traffic media configration [sic] etc.). Current layout invites a head to head collision at the mid point of Residental [sic] entrance and Heritage Park entrance.

Response to Comment 7-15

The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR. According to the Draft EIR, as provided on page 4.11-21 in Section 4.11, Transportation, and substantiated in Appendix J, Transportation Impact Study, of the Draft EIR, the driveways would be designed to City standards and would meet the City's requirements to protect driver, bicyclist, and pedestrian safety. The Project would provide a driveway that is aligned with the intersection of Heritage Place and Machado Road. This intersection would be designed to provide safe operations, and it was found that drivers turning left into the Project Site would not conflict with drivers turning left into Heritage Place. Refer to Responses to Comment Letter 6 from the Classics at Heritage Park Homeowners' Association regarding proposed modifications to the Machado Road/Heritage Place/Project driveway intersection to enhance the safety and feasibility of opposing left-turns on Machado Road into the Project residential driveway or Heritage Park.

Comment 7-16

Mie Joness: Currently there are signals at 1) Seplv [sic] and Machado, and 2) Sepulv [sic] and Jefferson. It is a very short block and we are adding one more signal in the mid-block at Janisann. Signal coordination will be critical for the traffic flow. Was there a study for alternatives for not having signal at Janisann and improve pedestrian crossing and traffic timing at the two existing intersections above?

Response to Comment 7-16

The location and study of traffic signals in relation to traffic flow and delay is not considered relevant to CEQA. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. Nonetheless, the proposed traffic signal at the intersection of Sepulveda Boulevard and Janisann Avenue would be sufficiently far from the intersections of Sepulveda Boulevard Machado Road and Sepulveda Boulevard and Jefferson Boulevard. The spacing between these future signals would be further than some currently signalized intersections in the surrounding area. It is required that installation of a signal include coordination with neighboring signals to maintain efficient traffic flow. The City of Culver City will condition the Project to connect this new signal to the City's adaptive traffic control system, along with modifications at signalized intersections surrounding the Project Site. The addition of a traffic signal also would allow for safe signalized pedestrian crossings across Sepulveda Boulevard.

Comment 7-17

Katie Chou: There is a narrow R-1 zoning (along Merchado [sic] curb) at the nothmost [sic] parcel. What's the justification to covert R-1 zoning to General Commercial use.

Response to Comment 7-17

The area with R-1 zoning along the Machado Road curb is currently used for parking by ECF. As discussed on page 2-4 in Section 4.7, Land Use and Planning, of the Draft EIR, the Project is proposing to change the zoning designations for the Project Site to "Planned Development" (PD), not General Commercial use. The PD designation requires adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[3] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a project site. In order to be approved, environmental review must support specific findings set forth in the Zoning Code that affirm, among other requirements, compatibility with adjacent uses, the sustainability and stability of the proposed project, adequacy of the road network serving the project site, and conformance with the General Plan.

In addition, when the City transferred this land to the ECF through a Disposition and Development Agreement in 2010, the City contemplated that the R-1 parcel may be developed in conjunction with the adjacent land.

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

Comment 7-18

Anonymous Attendee: Is your project already set in stone or can the residents still refuse the development

Response to Comment 7-18

The Project will go through a public hearing process involving Planning Commission and City Council hearings in which the City decision-makers will consider the information provided in the Draft and Final EIRs, including public comment, prior to determining whether to approve the Project. Although the decision of whether to approve the Project as proposed will rest with the Planning Commission and City Council, there will be opportunities for further public input during those public hearings.

Comment 7-19

Wendy Hamill: Has the impact of additional residents on Culver City school district resources and capacity been studied?

Response to Comment 7-19

Potential impacts on Culver City Unified School District were addressed in Appendix A-2, Initial Study, of the Draft EIR. As further discussed on page B-34 and B-35 in Appendix A-2, Initial Study, of the Draft EIR, new student enrollment was estimated and considered. The analysis concludes that Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to California Government Code Section 65995. In accordance with SB 50, the payment of these fees is deemed to constitute full and complete mitigation for impacts to school facilities. Therefore, impacts on school services and facilities were determined in the Initial Study to be less than significant.

Comment 7-20

Kimberly Ferguson: If this project was providing more low income and affordable housing along with the other amenities it would resolve a big Culver City housing issue. Can we not demand that this be increased and make them now take advantage of AB2345 to help pay for this additional housing?

Response to Comment 7-20

As noted during the public meeting, AB 2345 was not in effect at the time the Project's application was submitted to the City. As such, the Project is providing 19 units affordable to very low income residential households out of the total 230 units, which qualifies the Project for the proposed 35 percent density bonus (California Government Code Section 65915). Provision of the density bonus pursuant to California Government Code Section 65915 is mandatory under state law. In addition, as noted in Section 4.9, Population and Housing, of the Draft EIR, the Project's proposed housing would constitute 6.9 percent of the 6th Cycle RHNA allocations between 2021 and 2029. As such, while the Project on its own does not resolve the City's broader housing needs, the Project would

assist the City in meeting the affordable household goals provided in the 2013-2021 Housing Element and promote fulfillment of the City's the 6th Cycle RHNA allocation.

Comment 7-21

Kimberly Ferguson: NO, it was not! it was just said that it wasn't available when the project began, that does not mean they cannot nowo! [sic]

Response to Comment 7-21

Refer to response to Comment 7-20, above.

Comment 7-22

Michelle Mata: Where will the school employees park? I believe the current parking lot will be taken away

Response to Comment 7-22

This comment does not relate to a specific CEQA issue raised in the Draft EIR. The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR. As stated on page 2-1 and 2-21 in Chapter 2, Project Description, of the Draft EIR, and elsewhere throughout the Draft EIR, the Project would allocate 34 parking spaces that would be fully dedicated to ECF within the subterranean parking garage. Also refer to Response to Comment 10-4 for additional information regarding Project parking.

Comment 7-23

Robin Turner: Jay - you are wrong about the development not impacting scenic views. it [sic] will destroy the current viewline for the housing on the Culver Crest as well as with the housing that is currently around the project. The EIR seems NOT to have analysed [sic] the project and suroundding [sic] areas in Culver City very well. All options should have been considered. How can you expand on ALL of thepotential [sic] options instead of just making minimal adjustments the original project requirements only? I read/write EIR technical documents almost every day and this EIR needs to be expanded on.

Response to Comment 7-23

Scenic views were addressed in the Initial Study prepared for the Project, included in Appendix A-2, Initial Study, of the Draft EIR. Based on the analyses and findings in the Initial Study, effects on scenic vistas and public views were determined to be less than significant and were not further evaluated in the Draft EIR. In regards to aesthetics, threshold question a. on page B-1 in Appendix A-2, Initial Study, of the Draft EIR, it is noted that the Project Site is located in a highly urbanized area, and that the topography surrounding the Project Site is relatively flat with no ocean, or notable mountain or other scenic vistas that would be affected by the Project. It is further stated that areas of Baldwin Hills and Culver Crest, which can be viewed from the Project Site and surrounding areas, have been altered from their natural condition by residential and oil field development. Further, the Project Site is not located in a scenic resource area or an area with protected views

designated by the City. Given the highly urbanized nature of the Project Site and surrounding areas, the comment that the Project would impact scenic views by destroying the current viewline from houses on Culver Crest is unclear and not supported. Not only would the Project represent a very small portion of the broad views of urbanized areas of Culver City as seen from Culver Crest, it would not block views across the Project Site of important scenic resources, such as ocean views or scenic views of mountains or notable natural resources. Rather, the Project would intensify development on one property among thousands within the broad urban view field from higher elevations within Culver Crest, from vantage points approximately 0.5 miles or so from the Project Site. Regarding the comment that the Project would also destroy scenic views from housing surrounding the Project Site, the topography of these areas is generally flat, few homes have direct unobstructed views toward the Project Site, and there as there are no scenic views or important scenic resources within the urbanized setting of these areas that would be blocked by the Project. Furthermore, the focus of assessing impacts on views under CEQA is on public views, rather than private views. Consistent with the findings in the Initial Study, the Project would not have a substantial adverse effect on a scenic vista.

The Initial Study also evaluates under threshold question c., on page B-2 in Appendix A-2, Initial Study, of the Draft EIR, whether the Project would substantially degrade the quality of public views of the Project Site and its surroundings such that it would conflict with applicable zoning or other regulations governing scenic quality. As further described therein, the Project Site is developed with a mix of aging commercial development and surface parking, and currently has low scenic quality. As the Project would replace such improvements with unified high quality architecture and landscaped open space areas, including Machado Park, and would not conflict with the discussed City plans and regulations governing scenic quality, impacts associated with public views were determined less than significant. Also refer to Response to Comment 7-13.

Comment 7-24

Katie Chou: Mr. Liu, you did not provide any supporting statements except saying no safety issue at the mid point of Heritage Park and residential entrance. You did not answer the queueing traffic is unfairly pused [sic] to Mechado, [sic] either.

Response to Comment 7-24

Refer to the Response to Comment 7-15 and Response to Comment 6-2 from the Classics at Heritage Park Homeowners' Association regarding proposed modifications to the Machado Road/Heritage Place/Project driveway intersection to enhance the safety and feasibility of opposing left-turns on Machado Road into the Project residential driveway or Heritage Park. In addition, the non-CEQA driveway operations analysis conducted as part of Appendix J, Transportation Impact Study, of the Draft EIR estimated that driveway intersection queues are not expected to spillback onto the through lanes of Machado Road during either the A.M. or P.M. peak hour.

Comment 7-25

Kimberly Ferguson: Do you know what the square footage of the housing will be?

Response to Comment 7-25

The Project is fully described in Chapter 2, Project Description, of the Draft EIR. The development statistics for the Project are shown in Table 2-1, Development Program Summary, on page 2-8 in in Chapter 2, Project Description, of the Draft EIR. As indicated therein, residential square footage totals 244,609 square feet.

Comment 7-26

Kimberly Ferguson: individual units

Response to Comment 7-26

As indicated on page 2-8, in Table 2-1, Development Program Summary, in Chapter 2, Project Description, of the Draft EIR, the Project includes a total of 230 residential units.

Comment 7-27

Anonymous Attendee: My understanding is that parking is free for the retails [sic] customers for this project, but it is not free for the retail staff. Is there something being done to prevent staff from parking in the surrounding residential area?

Response to Comment 7-27

This comment does not relate to a specific CEQA topic area. Nonetheless, parking inside the Project Site would be free for commercial visitors and employees. As the Project would result in a daily work VMT/employee significant impact as a result of the office use, as analyzed in Section 4.11, Transportation, of the Draft EIR, charging office use employees for parking was included as a proposed TDM measure. This TDM measure and other TDM measures would encourage commute trips by modes other than driving a car. The Project's TDM Program will describe policies and a monitoring plan to ensure that the spirit and intent of the TDM mitigation measure is being followed. Refer to Response to Comment 10-4 for additional information regarding Project parking.

Comment 7-28

Bonnie Wacker: If i [sic] remember correctly the initial traffic analysis rated the area with a d rating. Will the rating improve after the mitigation measures. [sic]

Response to Comment 7-28

LOS is no longer being used as a metric to determine significant impacts or proposed mitigation measures. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. TDM measures aimed at mitigating significant VMT impacts are proposed. Refer to Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR.

Appendix J, Transportation Impact Study, of the Draft EIR acknowledged that the Project would add vehicle traffic to the surrounding street system. Pages 46 and 51 in Appendix J, Transportation Impact Study, of the Draft EIR, explains that the Project would increase delay at studied intersections under a non-CEQA context, but this would not be considered a significant impact under CEQA. Pages 35, 46, 50, and 51 in Appendix J, Transportation Impact Study, of the Draft EIR, discuss studied intersections operating at LOS E or F with or without the Project. In response, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, payment of a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 7-29

Carolyn Strauss: Why do we need more office space and retail when so much of this is already vacant due to online shopping and those working from home?

Response to Comment 7-29

The comment regarding proposed office space under the Project is noted and will be provided to the decision-makers for their consideration, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted.

Comment 7-30

Cathy Penso: Will parking meters be put in on Sepulveda?

Response to Comment 7-30

Although parking is not a CEQA issue relating to transportation, parking is not currently permitted along the Sepulveda Boulevard frontage of the Project Site, and the Project does not propose to add any parking spaces or meters along Sepulveda Boulevard.

Comment 7-31

Vicky Foxworth: What hours will construction be allowed?

Response to Comment 7-31

The construction schedule and activities associated with the Project are discussed on page 2-24 and page 2-25 in Chapter 2, Project Description, of the Draft EIR. As stated therein, the Project would

comply with Culver City Municipal Code (CCMC) Section 9.07.035's allowable hours of construction which are limited to 8:00 A.M. to 8:00 P.M. on weekdays, 9:00 A.M. to 7:00 P.M. on Saturdays, and 10:00 A.M. to 7:00 P.M. on Sundays.

Comment 7-32

Cathy Penso: What are the days and hours of construction?

Response to Comment 7-32

Refer to Response to Comment 7-31, above.

Comment 7-33

Katie Chou: Can fire trucks enter/ exit Mechado retail entrance?

Response to Comment 7-33

Analysis of emergency access for fire protection services is provided in Section 4.10.1, Public Services – Fire Protection, of the Draft EIR. As discussed on pages 4.10.1-16 and -17 in Section 4.10.1, Public Services – Fire Protection, of the Draft EIR, emergency access would be provided from all three street frontages surrounding the Project Site. Implementation of PDF-FIRE-2 would ensure that the Culver City Fire Department (CCFD) would review and approve plans for building, fire lanes and associated turnarounds, fire hydrant locations, and associated equipment, to ensure adequate access to and within the Project Site for emergency vehicles.

Comment 7-34

Arthur Kassan: The mitigation for office traffic includes charging for on-site employee parking. What will keep the office employees from parking on Janisann or in the shopping center to avoid the fees?

Response to Comment 7-34

As discussed in Section 4.11, Transportation, of the Draft EIR, a comprehensive TDM Program is proposed as part of Mitigation Measure TRAF-1 that would be approved and monitored by the City, which includes TDM measures such as charging office use employees for on-site parking. The TDM Program would include protocols for monitoring compliance and preventing parking in nearby residential areas. Refer to Response to Comment 10-4 for additional information regarding Project parking.

Comment 7-35

Cathy Penso: Can you repeat those hours?

Response to Comment 7-35

Refer to Response to Comment 7-31, above.

Comment 7-36

Anonymous Attendee: Not sure if this is an EIR topic, but currently Verizon cellular signal is very poor in the area. With the additional demand from this project, is there something being done to strengthen the signal?

Response to Comment 7-36

The comment regarding cellular signal is noted and will be provided to the decision-makers for their consideration. Appendix A-2, Initial Study, of the Draft EIR, analyzed telecommunication infrastructure under threshold question a) of the Utilities and Service Systems topic. As discussed on page B-44 in Appendix A-2, Initial Study, of the Draft EIR, as telecommunication providers already deliver their services to a large number of homes in in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated.

Comment 7-37

Kimberly Ferguson: Can we not have one day of rest from construction...to eliminate traffic congestion on Sunday? or say no exterior construction at least on Sundays?

Response to Comment 7-37

As noted in Response to Comment 7-31, above, the construction schedule and activities associated with the Project are discussed on page 2-24 and page 2-25 in Chapter 2, Project Description, of the Draft EIR. As stated therein, the Project would comply with CCMC Section 9.07.035's allowable hours of construction which allows construction on Sunday's from 10:00 A.M. to 7:00 P.M. Also note, as described on page 4.11-14 and 4.11-15 in Section 4.11, Transportation, of the Draft EIR, that a Construction Management Plan will be prepared for the Project and will require a community meeting to be held prior to completion of a Final Construction Management Plan, to discuss construction plans and related community concerns.

Comment 7-38

Katie Chou: For the northmost [sic] parcel R1 zone, City could regulate to make sure the current use (R1 zone) is enforced. Why City choose to go the other way wihtout [sic] further justification

Response to Comment 7-38

Refer to Response to Comment 7-17, above.

Comment 7-39

Anonymous Attendee: Why do we need more housing apartments when there are apartments being built on all the borders of Culver City ?

Response to Comment 7-39

The comment regarding the development of more housing when there are already apartments building built on all borders of Culver City is noted and will be provided to the decision-makers for their consideration, but does not raise a substantive issue on the content of the Draft EIR, therefore, no further response is warranted. Note that Section 4.9, Population and Housing, of the Draft EIR provides and analysis of the Project's consistency with the Regional Housing Needs Assessment (RHNA). As discussed therein, the Culver City October 2013-2021 Housing Element, which is based on the 5th Cycle RHNA allocations, indicates the total housing growth need for the City during this planning period is 185 units. The 185 units represents the City's share of the RHNA approved by SCAG as a response to State-mandated housing planning. While the City has already met the 2013-2021 Housing Element goal of providing 185 households during this planning period, the City did not achieve the goals for affordable housing provisions within the 185 households. The Project's provision of 230 multi-family residential units, 19 of which would be for the Very Low income category, would assist the City in meeting the affordable household goals provided in the 2013-2021 Housing Element.

In addition to the 2013-2021 Housing Element, the City is currently in the process of updating its Housing Element to comply with State law, and support consistency with the housing needs for the City established in the 6th Cycle RHNA allocations. These allocations, which are pending HCD approval, show the City's allocation of housing between October 2021 and October 2029 to be 3,341 units. Accordingly, the Project's proposed housing would constitute 6.9 percent of the 6th Cycle RHNA allocations between 2021 and 2029. Therefore, the Project would promote fulfillment of the City's future updated Housing Element goals and the 6th Cycle RHNA allocation.

Comment 7-40

Kimberly Ferguson: Thank you for your time. There is a lot about this project that can be very positive and I do appreciate some of the revisions which have been made to date.

Response to Comment 7-40

The comment expressing appreciation for the revisions in response to public comments is noted and will be provided to the decision-makers for their consideration.

Comment 7-41

Vicky Foxworth: What role does the City Council play in approving this project?

Response to Comment 7-41

Refer to Response to Comment 7-18, above. As discussed above, as part of the CEQA process Project will go through a public hearing process involving Planning Commission and City Council hearings in which the City decision-makers will consider the information provided in the Draft and Final EIRs, including response to public comments, prior to reaching a decision on whether to approve the Project.

Comment 7-42

Anonymous Attendee: During the construction period, where the construction workers going to park?

Response to Comment 7-42

As a Project Design Feature and a required condition of approval, a Final Construction Management Plan will be prepared to be approved by the City to determine haul routes, construction parking, schedule, and lane closures. As described on page 4.11-15 in Section 4.11, Transportation, of the Draft EIR, construction staging would occur on the Project Site, and construction worker parking would be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site. The Final Construction Management Plan will require a community meeting to be held prior to completion to discuss construction plans and related community concerns.

Letter 8

Dr. Tom Williams
Citizens Coalition for a Safe Community
4117 Barrett Road
Los Angeles, CA 90032-1712

Ctwilliams2012@yahoo.com

Email received May 25, 2021

Comment 8-1

Questions/comments for DEIR 11111 Jefferson

Response to Comment 8-1

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 8-2 through 8-11.

Comment 8-2

Major Issues – Incomplete and Inadequate – Withdraw, Revise, and Recirculate

Response to Comment 8-2

This comment provides general statements without any specific references to the Draft EIR, and the analyses included in the Draft EIR. Because the comment does do not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 8-3

Project Objectives/Purposes (Goals) and Alternatives – Why are there several different uses of "purpose"…Use "Goal" with objectives

Response to Comment 8-3

This comment is very general and the focus of the question and what chapter, page and text within the Draft EIR is being referenced is unclear. Regarding use of the terms purpose and objectives in relation to the objectives of the Project, as stated in Chapter 2, Project Description, and Chapter 5, Alternatives, of the Draft EIR, CEQA Guidelines Section 15124(b) states that a project description shall contain "a statement of the objectives sought by the proposed project." In addition, CEQA Guidelines Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project." In keeping with these CEQA requirements, the Project Description in the Draft EIR includes a statement of the basic purpose and primary objective of the Project: "… to develop the Project Site with a mixed-use development that includes residential uses." And also includes 12 more specific objectives that are being sought by the Project. Because

the comment does do not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment 8-4

Where are/Provide enumerations/quantifications and direct tabular comparisons

Response to Comment 8-4

This comment is very general and the focus of the question and what chapter, page and text within the Draft EIR is being referenced is unclear, as is any related concern regarding the adequacy of the information provided in the Draft EIR. The Draft EIR includes numerous quantitative comparisons of the Project with environmental baseline conditions. Refer to the Draft EIR Table of Contents on pages iii and iv, of the Draft EIR, which lists over 60 tables included in the Draft EIR, many of which include quantitative information and tabular comparisons. In addition, there is an extensive amount of quantitative information, including tabular comparisons, in many of the technical reports included as appendices to the Draft EIR, refer to pages ii and iii of the Draft EIR Table of Contents. Given the general nature of the comment, and because this information appears throughout the Draft EIR and is too extensive to specifically cite, no further response is warranted.

Comment 8-5

Draft MMRP – Where are/provide specifics and enforcements and reportings [sic] (Qtrly and Online; Provide video feeds to public.

Response to Comment 8-5

The Mitigation Monitoring Program (MMP) that is required to be implemented if the EIR is certified and the Project approved, is included in Chapter 4, Mitigation Monitoring Program, of this Final EIR. The MMP, includes specifics that go beyond the content of the Mitigation Measures and Project Design Features included in the Draft EIR regarding how their implementation will be enforced and carried out, and by what entity.

Comment 8-6

Geology/Seismicity Provide seismic shock and liquefaction based on 7.1 RM/Seismicity – 10,000ft SW of Newport-Inglewood Fault (LADCP-ZIMAS) especially for higher (5 vs 2-3 floors) and deeper (>-20ft) structures and for differential joined loadings. Provide appropriate analyses and assessments and mitigation for structures and ground support. Provide elimination of liquefaction potentials.

Response to Comment 8-6

Geology and seismicity were evaluated in Appendix A-2, Initial Study, of the Draft EIR. As discussed therein, starting on page B-17 in Appendix A-2, Initial Study, of the Draft EIR, impacts regarding seismicity and liquefaction were determined to be less than significant, and were not carried forward for further analysis in the EIR. As further stated therein, the City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the 2019

California Building Code for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults, including the Newport Inglewood Fault referenced in the comment. Furthermore, the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. The Project would also be required to comply with applicable seismic-related regulatory requirements. In addition, a final design-level geotechnical report must ultimately be prepared and approved by the City prior to issuance of building permits, and would be based on the final construction and building plans prepared by the Applicant. Implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the final design-level geotechnical report would further ensure that seismic-related ground shaking impacts would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. More specifically, regarding liquefaction, the discussion on page B-18 in Appendix A-2, Initial Study, of the Draft EIR, indicates that seismic design parameters determined in accordance with Chapter 16, Section 1613 of the California Building Code and American Society of Civil Engineers would be implemented as part of the Project and that it would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2019 California Building Code. As stated on page B-16 in Appendix A-2, Initial Study, of the Draft EIR, further details regarding geology and seismicity are provided in the Report of Geotechnical Engineering Services (Preliminary Geotechnical Report), dated April 19, 2019, prepared by GeoDesign, Inc. which is available for review at the Culver City Planning Division.

Comment 8-7

Geology/Construction – what and where excavations and depths, how do you calculate bank-run cubic yards (area – sqyd x depth – yd = 15,000 sy x +6yd = 90,000 cy + bulking (e.g. 20%) and loaded cuyds, ??= 110K cy = 11,000 truck loads

Response to Comment 8-7

The general extent and depth of excavation required for the Project are described on page 2-25 in Chapter 2, Project Description, of the Draft EIR. The comment is general and the focus of the question and what chapter, page and text within the Draft EIR is being referenced is unclear, as is any related concern regarding the adequacy of the information provided in the Draft EIR. The basis for how truck loads were estimated for purposes of the air quality and noise analyses is provided in the Draft EIR and in Appendix B, Air Quality Technical Appendix, of the Draft EIR. Information regarding the area of soil to be graded (3.43 acres), and the amount of soil exported (88,000 cubic yards) and imported (3,000 cubic yards) as well as the number and capacity of haul trucks (10 to 14 cubic yards) were provided by the Project applicant. As detailed in Appendix B, Air Quality Technical Appendix, there are 9,100 trucks estimated to be used for soil import and export.

Comment 8-8

Traffic, Congestion and Air Pollution/Noise 11,000 truck trips = 5mi x 2 x 11,000 = 110,000 truck miles

Where will Site loading areas be?? (Sepulveda or Jefferson, In&Out, In>Out), Where will off-site staging/parking/holding areas be?? Where are multiple (e.g. for 5/five) Haul Routes?

Response to Comment 8-8

As indicated on page 4.3-15 in Section 4.3, Energy, of the Draft EIR, it is estimated that a maximum of 9,892 two-way truck trips would be required to haul materials to off-site facilities during construction (9,100 trucks associated with grading, 430 associated with site preparation, and 362 associated with demolition). Refer to Topical Response TR-1 regarding comments that do not relate to a specific CEQA threshold of significance used to assess transportation impacts of the Project under CEQA. From an air quality standpoint, the total number of trucks is not an issue as impacts are assessed based on daily emissions. As detailed in Appendix B, Air Quality Technical Appendix, there are 200 daily one-way truck trips anticipated for import and export of soils as well as site preparation activities and 20 trips per day for demolition. Trip distance was also provided by the applicant, at 30 miles per trip. Therefore, daily VMT would range between 600 to 6,000 trips per day as was modeled as part of the air quality analysis.

As described on page 2-27 and 2-28 in Chapter 2, Project Description, of the Draft EIR, as a Project Design Feature and a required condition of approval (refer to PDF-TRAF-1 discussed on pages 4.11-14 through 4.11-16 in Section 4.11, Transportation, of the Draft EIR), the Project would be required to prepare a FCMP, including a staging plan, and other details. As stated in PDF-TRAF-1, construction staging would occur on the Project Site, and construction worker parking would be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site. Furthermore, the FCMP will define specifics regarding haul routes, however, as stated in PDR-TRAF-1, use of Janisann Avenue west of the Project Site by haul trucks or construction worker vehicles, would be specifically prohibited. The analyses in the EIR assumed construction would occur throughout the Project Site with haul trucks entering and exiting on all road segments and then traveling to Interstate 10.

Upon completion of the Project, retail and grocery deliveries would load on-site via a loading dock accessed via the Machado Road driveway and additional retail deliveries and pick-up/drop-off would occur via a curb cut-out on southbound Jefferson Boulevard outside of the travel lanes. Residential pick-up/drop-off, rideshare, and residential deliveries will occur at a curb cut-out on northbound Sepulveda Boulevard outside of the travel lanes.

Comment 8-9

Groundwater – 31ft elevation, sealevel, what is the depth or elevation of current 2021 groundwater levels?

Ballona Channel floor - +12ft elevation How many groundwater monitoring wells have been made, remain, being monitored, and/or will be monitors for project duration

Will dewatering be done to avoid uplift and will GW monitoring of LID recharges be done?

Response to Comment 8-9

The issue of hydrology and water quality, including details regarding groundwater and dewatering, was evaluated in Appendix A-2, Initial Study, of the Draft EIR. As discussed therein on page B-26 in Appendix A-2, Initial Study, of the Draft EIR, according to the Preliminary Geotechnical Report, groundwater was encountered during exploration at depths between 38 feet to 43 feet below the ground surface. According to the Seismic Hazard Zone Map of the Venice Quadrangle, the historic high groundwater level for the Project Site was approximately 9 feet below the surface. As such, construction activities, which would require excavations down to 20 feet below ground surface, could encounter groundwater. Furthermore, any removed groundwater that would exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies would be subject to a dewatering plan and would be treated and disposed of in compliance with applicable regulatory requirements. Therefore, compliance with applicable stormwater and groundwater requirements (LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES Construction General Permits) would ensure that impacts to water quality during the Project's construction activities would be less than significant. For further details, as stated on page B-24 in Appendix A-2, Initial Study, of the Draft EIR, and in regard to such issues as groundwater monitoring, refer to the Hydrology, Hydraulics, and SUSMP Report (Hydrology Report), prepared by Kimley-Horn & Associates, Inc., dated September 10, 2020, which is available for review at the Culver City Planning Division. Because the comment does do not raise specific issues regarding the adequacy of the analysis provided in the Draft EIR, no further response is warranted.

Comment 8-10

Historic Archaeology and Hazardous Materials – 1920-1960s historic aerial

EDR has historic aerial photos have Building sites, Privies, and Trash Pits/Dumps been located?

Response to Comment 8-10

The Draft EIR addressed historical resources, archaeological resources, and hazards and hazardous materials in Section 4.2, Cultural Resources (refer to subsections 4.2.1, Historical Resources and 4.2.2, Archaeological Resources), and Section 4.6, Hazards and Hazardous Materials, of the Draft EIR, with supporting data provided in associated technical appendices of the Draft EIR. These analyses included assessment of historic aerials and other information, and concluded that impacts would be less than significant after implementation of mitigation measures where applicable. Because the comment is general and does do not raise specific issues regarding the adequacy of the analyses provided in the Draft EIR, no further response is warranted.

Comment 8-11

Land Use Growth inducement

Will project induce similar scale developments between Jefferson and Ballona Creek or between Sepulveda and Overland

Response to Comment 8-11

The Draft EIR addressed the potential for growth-inducing impacts in Chapter 6, Other CEQA Considerations, of the Draft EIR. As further discussed on page 6-2 and page 6-3 in Chapter 6, Other CEQA Considerations, of the Draft EIR, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for the City. As the Project would represent infill development and growth within the range of development anticipated in regional and local plans, and as the Project Site is well served by existing infrastructure, it would not remove obstacles to growth or induce unplanned growth beyond that associated with the Project, that would require development and construction of new service facilities that would significantly affect the environment individually or cumulatively. Therefore, the Project would not spur unplanned growth and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts.

Letter 9

Donald White and Lisa Chang
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Email received June 3, 2021

Comment 9-1

Culver City does not need to go the way of Santa Monica – with more and more high density housing, more and more traffic congestion, and more and more people.

Response to Comment 9-1

This comment focuses on general concerns regarding worsening of traffic congestion in the area with development of the Project. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. The Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR and was based on Appendix J, Transportation Impact Study, of the Draft EIR. Refer to Response to Comment 2-2, above, regarding traffic congestion.

Comment 9-2

We realize there is likely some big money behind a project such as this, and that the wishes of the local residents are not likely to be given serious attention. We would still like to state our strong objection to this project.

Response to Comment 9-2

This comment in opposition to the Project is noted.

Letter 10

Arthur L. Kassan, P.E.
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Culver City, CA 90230

Letter received June 14, 2021

Comment 10-1

I have reviewed the text of the subject Draft EIR, especially Appendix J, Transportation. I also attended the Zoom meetings on May 25, at which some of my questions were responded to. I have the following comments and questions about the information in the DEIR and about the project program and design.

Response to Comment 10-1

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 10-2 through 10-6.

Comment 10-2

SIGNIFICANT VMT IMPACTS OF PROJECT TRAFFIC

According to the DEIR, the traffic generated by the office component of the proposed project will result in VMT exceeding the City's threshold of significance for increase in VMT. To mitigate that impact, the DEIR authors have recommended an extensive TDM program aimed at reducing the commuter trips associated with the offices.

However, according to Table 4 on page 36 of Appendix J, during the morning peak-hour, the office-related traffic entering the site (that is, the office employee commuter traffic) will total nine (9) vehicles, and during the afternoon peak-hour, the commuter traffic leaving the offices would also total nine (9) vehicles. If the TDM measures were to reduce those commuter traffic volumes by 25%, that would be a reduction of two (2) trips during each peak hour, and that high- percentage reduction would be in addition to the 5% "walk/bike/transit adjustment" that has already been factored into the estimates on Table 4.

Although that may satisfy the requirements of CEQA analysis, it should be obvious to any observer that the reduction of two (2) trips per hour will not result in a meaningful change in the actual traffic flow conditions at and in the vicinity of the project site.

Response to Comment 10-2

Transportation was addressed in Section 4.11, Transportation, of the Draft EIR, with supporting data and non-CEQA analysis provided in Appendix J, Transportation Impact Study, of the Draft EIR. The VMT impact threshold for Work VMT per Employee is an efficiency metric that relates

to vehicle miles traveled. It is not a measure of traffic congestion and mitigation of the VMT impact is not intended as mitigation for traffic congestion. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. CEQA does not allow for the determination of significant impacts using intersection level of service, delay, or congestion.

Comment 10-3

SIGNIFICANT INTERSECTION IMPACTS OF PROJECT TRAFFIC

According to the Intersection Queuing Analysis on page 55 of Appendix J, significant intersection impacts will result from the addition of project traffic at all five of the intersections adjacent to the project site. Although those impacts are not applicable to the CEQA analysis for the project, they will be real and meaningful to motorists passing the site in the future. The results of the analysis confirm the intuitive opinions of many Culver City residents that the project, as currently planned, is too large for the specific site and will add to the existing observed congestion at several of those intersections. Located at the confluence of two major traffic arteries that serve large areas of Los Angeles County in addition to Culver City, the additional project traffic congestion will have far-reaching impacts beyond the small area that was analyzed.

The intersection analyses are actually optimistic in their findings, because they are based on the assumption of optimum traffic signal timing at each intersection. Actual experience at nearby intersections under existing conditions demonstrates that optimal signal timing is not currently achieved. For example, along Jefferson Boulevard, between Duquesne Avenue and Machado Road, green signal indications to the side streets/driveways routinely extend 8 to 14 seconds beyond the times needed for traffic entering from those side streets/driveways to clear the intersections. That waste of signal time is one of the causes of the current peak-period congestion along Jefferson Boulevard. There is no reason to believe that operation of the signals adjacent to the project site would be more efficient (and certainly not optimal) in the future.

No realistic “corrective actions” to reduce the significant intersection congestion impacts have been found to be feasible and recommended by the DEIR authors. Provision of TDM measures to reduce project office commuter traffic are briefly mentioned as potential “corrective measures”. As discussed above, those measures would result in meaningless trip reductions (two (2) entering trips in the morning peak hour and two (2) leaving trips in the afternoon peak hour), and the congestion impacts would not be mitigated.

During the June Zoom meeting, the City’s DEIR traffic consultant, when asked about measures to correct that congestion, replied that no measures had been identified as yet, but the situation was still under consideration. The consultants have been studying the project and its impacts for many months and have not been able to identify measures to reduce those impacts; there is no reason to believe that solutions will appear in the next few months.

The one obvious solution that has not received serious consideration (except for the obligatory Alternatives section of the DEIR) is to reduce the size of the project to one that is appropriate for the location and size of the site. Instead of presenting a pre-determined project scope and trying to

fit it into too small a "bucket", the applicant and the City staff should jointly determine a project size and scope that will fit within that "bucket" without spilling over the sides and significantly impacting the surrounding area of the City. For example, Alternative 2, the "Code-Compliant Alternative", would be far more in keeping with the surrounding neighborhoods, while having substantially lesser impacts on the arterial street network.

Response to Comment 10-3

CEQA does not allow for the determination of significant impacts using intersection level of service, delay, or congestion, and mitigation measures addressing such effects are not required under CEQA. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. The commenter does not identify any CEQA significant impacts that relate to the Project except for the daily VMT per employee significant impact that is associated with the office use. The VMT impact was addressed on page 4.11-21, under Threshold TRAF-3, in Section 4.11, Transportation, of the Draft EIR, with supporting data and non-CEQA analysis provided in Appendix J, Transportation Impact Study, of the Draft EIR. This significant impact was fully mitigated according to the Culver City VMT Tool and the adopted CEQA thresholds and guidelines. The mitigation measures addressing the VMT impact are listed on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR. Additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR, and on page 14 in Appendix J, Transportation Impact Study, of the Draft EIR.

The comment regarding existing traffic signal timings will be provided to the decision-makers for their consideration as it is not a CEQA issue. Independent of CEQA and for informational purposes, as part of the non-CEQA operations analysis, and as stated on page 29 and 42 in Appendix J, Transportation Impact Study, of the Draft EIR, traffic signal timings were inputted for analysis based on information provided by the City of Culver City and calibrated to field observations. It is anticipated that the City will periodically monitor signalized intersections and make adjustments as necessary as part of their typical work. The Project will be required to retime the signals along Sepulveda Boulevard as part of installing the proposed new traffic signal at the Sepulveda Boulevard/Janisann Avenue intersection.

Regarding the comment that reducing the size of the Project has not received serious consideration, and that the Code-Compliant Alternative evaluated in the EIR would be more in keeping with the neighborhood and have substantially fewer impacts, Alternatives were evaluated in Chapter 5, Alternatives, of the Draft EIR. As stated on page 5-1 in Chapter 5, Alternatives, of the Draft EIR, CEQA Guidelines Section 15126.6(a) provides that: "… [a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project." As stated in Chapter 5, Alternatives, of the Draft EIR, Alternative 2, the Code-Compliant Alternative would be reduced in size compared to the Project, and, as stated on page 5-32 in Chapter 5, Alternatives, of the Draft EIR, it would not have an office use, and would avoid the Project's significant VMT impact related to the office and

the associated need for implementation of Mitigation Measure TRAF-1 to reduce the impact to a less than significant level. Therefore, Alternative 2's VMT impacts would be less than significant, and impacts related to VMT would be less than the Project. It should also be noted that it would only fully meet one of the Project's 12 objectives. The Draft EIR also evaluated Alternative 3, a Reduced Density Alternative, that would also be reduced in size compared to the Project. As reflected in Chapter 5, Alternatives, the Draft EIR, serious consideration was given to reducing the size of the Project, and the Draft EIR fulfilled CEQA requirements by focusing on alternatives that would reduce or avoid its significant impacts. Regarding the comment that the City should consider a reduced Project alternative, the comment will be provided to the decision-makers for their consideration.

Comment 10-4

PROJECT PARKING

On page 66 of Appendix J of the DEIR, there is an unnumbered and untitled table on which the proposed parking supply for each component of the project is presented. The required number of spaces for each of the residential components is based on a chapter of the California Government Code that is footnoted at the bottom of the table. All of the other parking requirements are based on the City of Culver City Municipal Code. There is no explanation as to why the Municipal Code is not used for the residential parking. That exception should be explained.

A substantial advantage to the project applicant of using the State code for the residential parking is that it does not require any guest parking, while the Municipal Code Section 17.320.020 requires one (1) guest parking space per four (4) dwelling units. The project applicant generously volunteers to provide 14 guest spaces, that is, one (1) space per 16+ dwelling units, less than one-quarter of the Municipal Code requirement of 58 guest parking spaces.

With the small number of guest parking spaces, what will happen when, say, 10% of the residents have guests? That would be a minimum of 23 parking spaces. What if some have more than one guest at a time, for example, for a book club or a card game or a birthday party? Where will the spillover of guest parking be accommodated – on Janisann Avenue or in the shopping center across the street? Or will they park on-site, thereby reducing the parking available to retail customers?

How will project residents be kept from parking in the guest parking spaces? For example, a couple living in a one-bedroom unit may have two cars but only one allotted space, or a family with a teenager may live in a two-bedroom unit with two parking spaces but have three cars. And, if they don't park the extra car in the guest parking, where will they park it?

One of the recommended provisions of the TDM is to charge office employees a fee for on-site parking as a disincentive to driving to the site. However, there are supplies of free parking at short walking distances from the site that will be attractive to office employees – along Janisann Avenue and in the shopping center on the east side of Jefferson Boulevard. What will prevent the office employees (and retail employees, perhaps) from parking off-site? When asked about that at the June Zoom meeting, the City's traffic consultant said that there would be monitoring to prevent

that. Would that monitoring be by City staff or by project employees; and would it be in effect during peak hours every day as long as the offices are occupied?

According to page 67 of Appendix J, the project will provide 71 short-term bicycle parking spaces and 26 long-term spaces. According to City requirements, there should be 33 bicycle spaces for residents; shouldn't they be long-term spaces, so that residents off-site at work or away from home will have adequate bicycle parking? And shouldn't site employees have long-term spaces, so they can park their bicycles during their entire workday without concern?

The "parks" that are to be provided on-site are described by the applicants as being available to all members of the public. For those who do not live within a convenient walking distance of the site, where will they park while they are enjoying the "parks"?

Response to Comment 10-4

Parking is not considered a CEQA issue. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Nonetheless, independent of CEQA and for informational purposes only, page 66 in Appendix J, Transportation Impact Study, of the Draft EIR, provides a non-CEQA review of the Project's required parking under the CCMC and California Government Code. California Government Code Section 65915 residential parking minimum rates were used for the Project's residential parking requirements. As noted in the comment, the major difference between the California Government Code and the City code relates to residential guest parking spaces. Because the Project provides 19 units affordable to very low income households, it is entitled to utilize the residential parking requirements under California Government Code 65915, and the City does not have authority to require more.

Although no guest parking spaces are required, the Project would provide 14 guest spaces within the residential parking garage. Parking for guests beyond 14 vehicles is provided in the commercial garage. This is not expected to cause parking issues for commercial uses because residential guest parking demands are typically higher at times when uses such as offices and retail are closed or not at peak demand. The Project is also providing 14 total parking spaces beyond Culver City code requirements for the commercial uses. Given the fluctuations in daily demand in the commercial parking garage, the surplus of commercial parking spaces, and the dedicated guest parking spaces in the residential garage, the Project can accommodate more than 10 percent of residents who may have guests who drove to the Project Site at the same time.

In regards to resident parking, as stated above, the Project is entitled to the parking requirements under the California Government Code Section 65915 due to its provision of 19 units affordable to very low income households. Consistent with California Government Code 65915(p)(1), the Project provides two parking spaces for each two-bedroom unit, and one space for each one-bedroom and studio unit.

With regard to the proposed TDM mitigation measure, the Project will be preparing a TDM Program to be completed prior to occupancy (refer to Mitigation Measure TRAF-1 provided on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR). The TDM Coordinator will oversee and monitor the TDM Program to ensure that office use employees are following the rules and regulations. Office use employees would be required to provide proof that they are adhering to the spirit and intent of the mitigation measure. The City will also enforce compliance with the TDM Program.

As it relates to bicycle parking, as discussed on page 67 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project will be providing bicycle parking beyond required CCMC minimum requirements. The Project is required to provide a combined total of 63 bicycle parking spaces, and is providing a total of 97 bicycle parking spaces. The CCMC does not require the separation or differentiation of required bicycle parking spaces by land use into short-term or long-term types of spaces.

With respect to the comment on park access, it is not anticipated that the publicly available park on the Project Site will be a major draw for visitors arriving by a motor vehicle or transit. It is anticipated that many of the park patrons would also be patronizing other businesses within the Project, which is already accounted for in the parking minimum calculations, or would be walking to the park from surrounding neighborhoods or from the on-site dwelling units. The surplus commercial parking, which is available at no charge to visitors to the Project Site, may also be used for park users.

Comment 10-5

TRUCK SERVICE

The only truly on-site truck loading area will be the two-truck zone for the market. All other truck loading will be at two essentially curbside parking areas – one on Sepulveda Boulevard (which is labeled "Residential Drop-Off" in Figure 2-4, Ground Level Plan); and one on Jefferson Boulevard (which was not shown on the Initial Study plan, but was added subsequently). Although the two curbside areas will be technically within the site boundaries, they will be equivalent to on-street parking areas in their operations, as trucks maneuver to enter and leave the insets from and into street traffic lanes, and as loading/unloading takes place immediately adjacent to traffic lanes. The potential safety impacts and traffic flow friction impacts of those insets should be evaluated.

The Sepulveda Boulevard inset will be near the residential component lobby, but it will be too far from any of the retail/restaurant establishments to be of any effective use for them; all of those will have to be served from the Jefferson Boulevard inset.

Based on the plans provided in the DEIR, the Sepulveda Boulevard inset will be approximately 90 feet long. That inset will have to accommodate Post Office vehicles parked for at least two hours per day (assuming that the mail delivery person can load the 230 residential boxes at an average of 30 seconds per box); daily package delivery vans for at least three different companies; and one to two moving vans per week, 50 to 60 feet long plus room for rear-access ramps. What assurance will there be that all of those trucks will be accommodated within the inset? If not, truck drivers

aiming to meet their tight schedules will park at the street curb outside of the inset, that is within the traffic lane, as can be observed frequently at existing developments.

Also, what will become of the "residential drop-off" activity for which that inset is designated on the Ground Level Plan? Passenger vehicle drivers will not be able to access the inset with trucks filling the spaces.

The Jefferson Boulevard inset will be approximately 70 feet long. Accommodating two trucks at a time will be a tight fit, but it could be done if no trucks are more than 30 feet long. However, the three proposed restaurants will get many deliveries each day to provide the various food and supply products that they need. Many of the restaurant provision trucks will be 40 feet long and more. Two such trucks could not be accommodated at one time; nor could one 40-foot long truck with rear loading plus one 30-foot long truck.

More thought should be given to the design and the actual potential traffic operations at the two insets.

Between the presentation of the Initial Study plan and the publication of the DEIR, a substantial change has taken place in the location and design of the "Retail Site Access" driveway on Machado Road. Somebody recognized that the large market trucks could not maneuver into and out of their internal loading zone with the Initial Study-design driveway. Therefore, the driveway that had been centered approximately 180 feet west of the Jefferson Boulevard curbline was moved eastward to be centered approximately 155 west of that curbline. A 25-foot wide striped apron was added in front of the loading dock to be a necessary part of the truck maneuvering area. That driveway relocation will result in reducing the length of the left-turn lane on westbound Machado Road for vehicles turning into the retail driveway. Will that length of left-turn lane be adequate?

Figures 5 and 6 of Appendix J (pages 24 and 25) illustrate the "Proposed Truck Entry Path" and "Proposed Truck Exit Path" for the market loading area. Both paths must make use of the entire retail parking driveway (both the vehicle entry lane and the vehicle exit lane) plus the striped apron in front of the loading area. Trucks making the entering maneuver will have to cross the driveway twice – once on entering the site from the street, and again while backing into the loading area. If there will be one or more vehicles stopped in the exit lane of the driveway waiting to turn onto Machado Road, the market trucks will be completely unable to either enter or exit the site or to back into the loading area. Considering that the market and two of the restaurants will attract high-turnover parking and that the Machado Road driveway will be one of only two driveways serving 311 parking spaces, there is a high likelihood that there will exiting vehicles in that driveway at virtually all times that the retail/restaurant establishments are open. How will the trucks maneuver? Will some employees have to direct driveway traffic during the maneuvers, holding up both entering and exiting vehicles to keep the driveway clear for the trucks? Will that or some other unexplained operation be feasible and safe?

Drivers of passenger vehicles turning into the driveway from either direction of Machado Road will not have adequate visibility of the maneuvering trucks within the garage. The differential in light levels between a sun-bathed street and an artificially-illuminated garage will make it difficult for drivers to see the trucks maneuvering within the garage. Westbound left-turning drivers will

begin their turns before they can see the maneuvering trucks, and they may be forced to stop part way through their turns blocking the eastbound Machado Way lanes while a maneuvering truck blocks the driveway. Obviously, the proposed loading zone location is not ideal from the viewpoints of driveway traffic flow or safety. Moving it a substantial distance from the Machado Road driveway would result in significant improvements in both safety and flow.

According to page 23 of Appendix J, "… heavy freight trucks such as WB-67 trucks that would serve the grocery use traveling on northbound Sepulveda Boulevard would be required to utilize the middle through lane to turn right onto eastbound Machado Road. Delivery hours could be restricted to off-peak periods to reduce the effects of wide turning trucks on City streets …" In other words, the curb return at the southeast corner of the Sepulveda Boulevard/Machado Road will be inadequate to accommodate the expected truck traffic at that intersection. An identified design flaw has been deemed acceptable by the DEIR authors. Note that the authors write that, "Delivery hours could be restricted …", not that they will be or must be restricted.

It is not sufficient to depend on the scheduling abilities of the trucking companies to overcome that design flaw. Truckers must meet tight schedules and cannot be depended upon to make adjustments to meet the needs of the proposed market. Street and freeway traffic are too unpredictable. Experience and observation show that many deliveries take place during peak hours at existing shopping centers. And, what will happen as the trucks make that extra-wide turn during off-peak hours when the speeds of other traffic on northbound Sepulveda Boulevard are likely to be higher than during peak hours? Will someone (a market employee or a trucking assistant) be directing traffic on northbound Sepulveda Boulevard to prevent drivers from attempting to pass on the right as truckers make their wide right turns? That will be a dangerous situation that should not be acceptable to the City. Designing an adequate and safe intersection curb return should be mandated.

Response to Comment 10-5

Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. Nonetheless, independent of the CEQA analysis and for informational purposes only, page 23 in Appendix J, Transportation Impact Study, of the Draft EIR provides a non-CEQA review of the Project's site plan. The on-street loading areas are typical features installed along roadways in Culver City and Los Angeles, and provide a safe area outside of travel lanes for loading that will occur. Such features exist in Downtown Culver City in front of The Culver Hotel, the Culver Boulevard/Cardiff Avenue intersection, and on Washington Boulevard in front of Trader Joe's.

Regarding the residential loading zone along Sepulveda Boulevard, a curbspace analysis using Fehr & Peers' *Curbspace+* tool[4] shows that the proposed length would provide adequate storage for the variety of delivery and loading needs the residential development would require. Not every residential unit would get postal mail every day. It is not expected that every moving van would be 50-60 feet long plus extra space for ramps. U-Haul rental trucks suitable for moving 2-bedroom

[4] Developed by Fehr & Peers, the *Curbspace+* tool translates land use size and setting into estimated peak hour delivery and passenger loading events and then visualizes that demand based on the defined scenario. The tool is powered by real-world observations and analysis including empirically-derived predictive equations of passenger and delivery vehicle loading demand and space needs.

apartments (28 percent of units) are less than 23 feet long. Rental trucks sized for moving studio or 1-bedroom apartments, the vast majority of residential units for the Project, are often 20 feet long. Therefore, a 90 foot long loading area would provide adequate loading space for residents.

Regarding the commercial loading zone along Jefferson Boulevard, commercial loading needs for the retail, restaurant, office, and fitness uses in the southern portion of the Project would be served by both the proposed pull-out and by additional loading spaces within the commercial parking structure adjacent to these uses. A curbspace analysis using Fehr & Peers' *Curbspace+* tool shows that the length of the loading zone would provide adequate storage for the variety of delivery and loading needs of the retail, restaurant, office, and fitness uses. The commenter assumes, without substantial evidence to support the assumption, that two (2) 40 foot long trucks would need to load at the Project Site at the same time, but this is not expected to occur since deliveries would be spread throughout the day to service 3 to 4 food service establishments. The 70 foot long loading zone along Jefferson Boulevard can accommodate one 40 foot long truck and an additional delivery truck, van, or passenger vehicle. This zone on Jefferson Boulevard and the loading spaces within the parking garage are anticipated to be adequate for the Project's needs.

Regarding the Machado Road commercial driveway, no changes were made to the location of the driveway between the Initial Study (IS) and the publication of the Draft EIR. Due to the need to accommodate the Project commercial driveway on Machado Road, the eastbound approach of Machado Road at Jefferson Boulevard will be modified to provide one left-turn lane and one shared through-right lane. This configuration was incorporated into the non-CEQA operations analysis, and it was found that there would be sufficient storage space for both eastbound left-turns at Jefferson Boulevard and westbound left-turns at the Project driveway. Changes in the layout of Machado Road between the IS and Draft EIR were to accommodate grocery truck turns and left-turns into the Project Site.

For large truck loading at the grocery store, staff would be present during these delivery periods to facilitate truck maneuvers on-site and prevent conflicts with passenger vehicles and those entering/exiting the commercial garage. The loading dock area would be visible from Machado Road approaches. Staff would direct traffic to ensure safe operations when large trucks are present. Similar scenarios already exist at mixed-use developments in the local area, including the Whole Foods in Downtown Los Angeles and Trader Joe's in West Hollywood.

Regarding large truck turns on Sepulveda Boulevard, the Project will require that grocery trucks enter Machado Road and the Project Site via a southbound left-turn at Sepulveda Boulevard instead of a northbound right-turn. The approximately 45-degree southbound left-turn is far easier for a large truck to make than the approximately 135-degree northbound right-turn and will eliminate the need to start the turn from the middle northbound through lane.

As stated on page 4.11-21 and 4.11-22 in Section 4.11, Transportation, of the Draft EIR, and for the reasons stated above, the Project would not substantially increase hazards or conflicts due to a geometric design feature under Threshold TRAF-3.

Comment 10-6

In summary, the proposed project program is too large and dense for the site and the current design has a great many significant flaws that will result in increased congestion and decreased traffic safety adjacent to the site and in the large areas that are served by the two arterial streets that border the site. Substantial reduction in the development program and correction of the design flaws are warranted before the project approval process advances.

If you have any questions, please contact me at (310) 558-0808 or artraffic@aol.com.

Response to Comment 10-6

This comment provides a general conclusion regarding the comments raised in this letter. Refer to the Responses to Comments 10-2 through 10-5 above. As discussed on pages 4.11-21 and 4.11-22 in Section 4.11, Transportation, of the Draft EIR, the Project would not substantially increase hazards or conflicts due to a geometric design feature under Threshold TRAF-3. In addition, the Project would reduce the number of driveways and curb cuts from 10 to three, therefore reducing the potential for vehicle/pedestrian conflicts. The installation of a traffic signal at the intersection of Sepulveda Boulevard and Janisann Avenue also would allow for safe signalized pedestrian crossings across Sepulveda Boulevard. In addition, the installation of bicycle lanes on Sepulveda Boulevard would increase safety for those riding bicycles.

Letter 11

Robyn Tenensap
ro10@aol.com

Email received on June 16, 2021

Comment 11-1

I am writing to oppose the size of the development being considered at 11111 Jefferson. That intersection, Jefferson and Sepulveda, is already congested with cars and buses going to The Mall, The Business Park, The 405 on-ramps, and the LAX Airport. Most times it takes me two or three signal cycles to pass through that intersection. With the size of the proposed development, it will only get worse.

Response to Comment 11-1

Traffic related issues were addressed in Section 4.11, Transportation, of the Draft EIR, with supporting data and information provided in Appendix J, Transportation Impact Study, of the Draft EIR. CEQA does not allow for the determination of significant impacts using intersection level of service, delay, or congestion. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Appendix J, Transportation Impact Study, of the Draft EIR acknowledged that the Project would add vehicle traffic to the surrounding street system. Pages 46 and 51 in Appendix J, Transportation Impact Study, of the Draft EIR, explains that the Project would increase delay at studied intersections under a non-CEQA context, but this would not be considered a significant impact under CEQA. Nonetheless, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, pay a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

Comment 11-2

A development that size with (sic) affect the quality of life for all using that area with added noise and air pollution, Greenhouse Gas Impact, traffic, and a strain on our already burdened infrastructure, such as Water, Power, and Sewage. We are already experiencing Black Outs and requests to not use AC and other appliances during peak hours.

Response to Comment 11-2

Noise, air quality, GHG, and transportation, were addressed in Section 4.8, Noise, Section 4.1, Air Quality, Section 4.5, Greenhouse Gas Emissions, and Section 4.11, Transportation, of the Draft EIR. As noted in Chapter 6, Other CEQA Considerations, of the Draft EIR, utilities and service systems were evaluated in Appendix A-2, Initial Study, of the Draft EIR.

Regarding noise, refer to the analyses provided in Section 4.8, Noise, of the Draft EIR, which found that the Project would have less than significant impacts during the operation of the Project. Specifically, as discussed on page 4.8-45 in Section 4.8, Noise, of the Draft EIR, increases in ambient conditions due to overall Project operations would not exceed the threshold of a 5 decibel (dBA) Equivalent Continuous Level (L_{eq}) increase in noise levels. As such, the composite noise level impact on the nearest sensitive receptors due to the Project's future operations would be less than significant, and no mitigation measures are required.

Regarding air quality, refer to the analyses provided in Section 4.1, Air Quality, of the Draft EIR, which found that the regional and localized air quality and TAC emissions during operation of the Project would be less than significant. Refer to pages 4.1-46, 4.1-49, and 4.1-52 in Section 4.1, Air Quality, of the Draft EIR, for further details.

Regarding GHG emissions, the analyses provided in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR, found that the Project's impacts would be less than significant. As detailed therein, with the implementation of the Project's green building measures, the Project would not generate GHG emissions that may have, either directly or indirectly, a significant impact on the environment, and the impact would be less than significant. In addition, the Project would be consistent with statewide, regional and local plans, policies, regulations, and recommendations to reduce GHG emissions from development.

Regarding transportation, the analyses provided in Section 4.11, Transportation, of the Draft EIR, found that the Project would result in a daily work VMT/employee significant impact. However, this impact was fully mitigated with implementation of Mitigation Measure TRAF-1, as provided on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR.

Regarding public utilities, as noted in Chapter 6, Other CEQA Considerations, of the Draft EIR, Appendix A-2, Initial Study, of the Draft EIR, provides analysis that concluded that the Project would not result in the relocation of construction or new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities and impacts were determined to be less than significant.

Comment 11-3

I ask that you consider the proposed size of the project and the need to be downsized by at least 50%. We do need housing in our City but Commercial and retail spaces are not necessary. I suggest eliminating the second floor of commercial space and one floor of apartments.

We need to consider the impact this development will have on our City.

Response to Comment 11-3

The commenters note to consider the size of the Project is noted. Chapter 5, Alternatives, of the Draft EIR evaluates alternatives to a project that can either eliminate significant adverse environmental impacts or substantially reduce them. Alternative 2, Code-Compliant Alternative, evaluates an alternative project similar to the one suggested by the commenter. As described on page 5-20 in Chapter 5, Alternatives, of the Draft EIR, Alternative 2 would include development of 114 residential units and the ground floor would consist of 15,000 sf of restaurant area, which is an approximately 50 percent reduction in residential units (230 units under the Project compared to 114 units under Alternative 2) and an approximately 77 percent reduction in commercial uses (66,500 square feet under the Project compared to 15,000 square feet under Alternative 2). While Alternative 2 was considered the environmentally superior alternative for purposes of the CEQA analysis, because Alternative 2 would not develop affordable housing units, would not include a grocery store, or provide Machado Park, objectives related to these components of the Project would not be met. Compared to the Project, and as further discussed on pages 5-33 and 5-34 in Chapter 5, Alternatives, of the Draft EIR, Alternative 2 would not meet four Project objectives, and would only partially meet seven Project objectives.

Letter 12

Temple Akiba of Culver City
5249 S. Sepulveda Boulevard
Culver City, CA 90230

president@templeakiba.net

Email received on June 18, 2021

Comment 12-1

I have attached our comments on the draft EIR. I have also sent this by UPS mail.

Please feel free to contact me with any questions.

Response to Comment 12-1

Responses to the attached comments are provided below in Responses to Comments 12-2 through 12-6.

Comment 12-2

Temple Akiba is excited about the development at 11111 Jefferson Blvd. We welcome new commercial and retail activity in the area and are eagerly anticipating announcements of what businesses will be our new neighbors.

Temple Akiba of Culver City has been in Culver City since 1952 and is the spiritual home for over 400 families, most of whom also reside in Culver City. We have an Early Childhood Center ("ECC") that has been in operation for over 40 years and currently the school to over 80 two, three, and four- year old children. In addition, we have 200 students in various educational programs for children between kindergarten age and high school age that occur at Temple Akiba.

There are so many families that depend on Temple Akiba for the education of their children and the nourishment of their souls. Because of this we want to ensure that Temple Akiba can continue its operations without any interruption by the activity that will be occurring across the street for many years during construction, and after.

We have attended the public meetings as well as met with the project developers several times. We have the following concerns and requests:

Response to Comment 12-2

This introductory comment is noted.

Comment 12-3

1. Interim Parking and long term parking: Parking is already challenging. Our parking consists of our parking lot, parking next door and street parking. The project will make parking even more challenging. We request the following:

a. **Interim parking:** During the construction, we request that construction workers and trucks not park on Sepulveda or Janisann Avenue.

b. **Long term parking:** After, the project is completed, we request the ability to park in the new structure, especially at night and weekends. This is the time for our special events and religious services. Parking is a crucial to our future and we look forward to discussing.

Response to Comment 12-3

As a Project Design Feature and a required condition of approval (PDF-TRAF-1 discussed on pages 4.11-14 through 4.11-16 in Section 4.11, Transportation, of the Draft EIR), the Project will prepare a FCMP to determine construction staging areas, worker parking areas, and haul routes. The FCMP will determine the exact details and locations at a later date before construction, and will involve input from neighboring communities and approval by the City.

The Draft EIR discussed parking on page 2-21 in Chapter 2, Project Description, of the Draft EIR. Although parking is not an issue that requires analysis pursuant to the CEQA or the thresholds of significance used in the Draft EIR, parking is proposed for the Project at a level considered adequate to serve the Project. Parking would be provided pursuant to CCMC and California Government Code residential parking minimum rates in accordance with the State density bonus law, SB 1818. While the comment suggests that the Project would make parking even more challenging for the Temple, in light of the parking being proposed for the Project, the specific basis for this concern is not clear. As cited on page 66 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project overall would be providing more parking spaces than required by relevant codes. Regarding parking during construction, as indicated on page 2-27 and 2-28 in Chapter 2, Project Description, of the Draft EIR, the Project includes a Construction Management Plan (refer to Project Design Feature PDF-TRAF-1), which, among other provisions, requires that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site. The Construction Management Plan will require a community meeting to be held prior to completion of the FCMP to discuss construction plans and related community concerns. Regarding long term parking, and the interest in use of the Project parking structure for special temple events, this comment does not relate to the adequacy of the analyses in the Draft EIR, however, the comment will be provided to the decision-makers for their consideration. Refer to Response to Comment 10-4 for additional information regarding Project parking.

Comment 12-4

2. Dust/Pollutants: During the construction, many types of harmful dust will be generated. Many of our school activities and Temple events are outside on our property. To protect our kids during the construction, we need to hire an extra dedicated janitorial staff 7 days per week to

clean up all surfaces outside. The approximate cost for this is $7,000.00 per month. We request the resources to provide this.

Response to Comment 12-4

The Draft EIR addressed dust and air pollutants in Section 4.1, Air Quality, of the Draft EIR, including analysis of the temple as a sensitive receptor. As further described therein, dust control measures would be required during construction of the Project, as required by SCAQMD Rule 403 (Control of Fugitive Dust), and, as stated on page 4.1-55 in Section 4.1, Air Quality, of the Draft EIR, in Mitigation Measure AIR-1, during site preparation and excavation/grading phases, watering must be conducted a minimum of 4 times per day. Alternatively, other fugitive dust emissions practices shall be implemented that will reduce fugitive dust to at least the same level. Accordingly, as the Project would comply with SCAQMD Rule 403, and would implement Mitigation Measure AIR-1, to control dust through watering of the Project Site during construction, it is not expected that extra janitorial staff would be needed for cleaning due to dust from construction activities. Furthermore, the prevailing winds in the area are predominantly from west to east, away from the temple property.

Comment 12-5

3. **Noise:** The project will generate lots of noise from the trucks and actual building and digging. This can be extra disruptive during school hours and on Friday nights and Saturday mornings during religious services and Sunday mornings for religious school. We request the addition of Noise Barriers/acoustic shields on the project site during the construction period. Another solution would be to sound proof our 10 classrooms and offices.

Response to Comment 12-5

Noise was addressed in Section 4.8, Noise, of the Draft EIR, which found that the Project would have significant construction noise impacts and would require mitigation measures. The temple was analyzed in the Draft EIR as a sensitive receptor. Regarding the request for noise barriers during construction, refer to Mitigation Measure NOISE-1, on page 4.8-52 in Section 4.8, Noise, of the Draft EIR, and note that such barriers are already required. As this mitigation measure would reduce construction noise impacts to a less than significant level at the Temple and other nearby properties, construction noise impacts would be mitigated to a less than significant level, and therefore, there would be no need to soundproof classrooms and offices.

Comment 12-6

We look forward to discussing our proposals with you in the near future. In the meantime, feel free to contact our executive director, Jeffrey Rips director@templeakiba.net or myself at president@templeakiba.net with any questions.

Response to Comment 12-6

This concluding comment is noted.

Letter 13

John Yao
ichiangyao@gmail.com

Email received on June 21, 2021

Comment 13-1

My comments/questions on the subject draft EIR:

1. Will noise measurements be taken prior to any construction to define baseline noise level? Shouldn't night time noise limit also include ambient noise level plus a certain number decibels (such as five), or 50 dBA, whichever is lower?

Response to Comment 13-1

Baseline noise levels were defined through ambient noise measurements, as summarized in Table 4.8-1 on page 4.8-9 in Section 4.8, Noise, of the Draft EIR. Chapter 9.07 of the CCMC provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. Construction activity is prohibited during nighttime hours and is not anticipated for Project construction. Therefore, nighttime ambient noise measurements and analysis of nighttime construction noise was not required.

Comment 13-2

2. Noise limits for Leq are stated in the report. What are the limits for Lmax or the maximum measured sound level? For example, one loud noise (spike in the noise level) can wake up people in the middle of the night even though the Leq noise limit is met.

Response to Comment 13-2

Chapter 9.07 of the CCMC provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours.

As the CCMC does not identify any specific noise limits during the permitted construction hours, there is no limit identified for either L_{eq} or Maximum Sound Level (L_{max}). However, construction is prohibited during nighttime hours between 8:00 P.M. and 8:00 A.M. the next day on Mondays through Fridays, from 7:00 P.M. to 10:00 A.M. on Saturdays, and from 7:00 P.M. to 8:00 A.M. on Sundays. Therefore, no sleep disturbance would occur in the middle of the night. Furthermore, refer to Mitigation Measures provided on page 4.8-52 in Section 4.8, Noise, of the Draft EIR, which include, among other requirements, a 15-foot-tall construction fence equipped with noise blankets to achieve sound level reductions of at least 12 dBA along the northern and western boundaries of

the Project Site. As stated on page 4.8-53 in Section 4.8, Noise, of the Draft EIR, with implementation of Mitigation Measures NOISE-1 and NOISE-2, maximum construction noise levels would not increase ambient noise levels at any of the noise-sensitive receptor locations above thresholds of significance, and the mitigation measures would reduce construction noise impacts to a less than significant level.

Comment 13-3

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Features
4.8 Noise	
PDF-NOISE-1 (Project Construction Schedule)	Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).
PDF-NOISE-2 (Mechanical Equipment Noise)	All mechanical equipment and/or ventilation systems not fully enclosed will be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dBA L_{eq} from 7:00 AM to 10:00 PM and 50 dBA L_{eq} from 10:00 PM to 7:00 AM at the neighboring property lines including the north and west property lines per sound level limits of the Culver City Noise Element.

Response to Comment 13-3

The reproduction of a portion of Table 2-2, Summary of Project Design Features, that was presented in full in Chapter 2, Project Description, of the Draft EIR, is not accompanied by a comment, so the concern is unclear and no further response is required.

Letter 14

Katie Chau
katiefchou@gmail.com

Email received on June 21, 2021

Comment 14-1

I am a resident of Heritage Park. Below are my comments for the 2021 May version of the Draft EIR.

Please confirm my comments are received.

Response to Comment 14-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Responses to Comments 14-2 through 14-12.

Comment 14-2

1) Please confirm the geometric design of the 2nd retail entrance facing Machado meets all of City's standards including an adequate geometry for an emergency vehicle access (i.e., fire trucks). If an emergency will make a retail entrance facing Sepulveda inaccessible, the only access point for fire truck to enter Project is Machado retail entrance. With a substandard Machado roadway width to accommodate a commercial use and the tricky location (i.e., at least two movements from Jefferson) to access, no one has confirmed the proposed geometry would permit fire truck access. This is extremely important as the Project is a high-density development/ housing.

Response to Comment 14-2

As discussed in Section 4.10.1, Public Services – Fire Protection, of the Draft EIR, CCFD would be able to access the Project Site from each of the streets bordering the Project Site, including Machado Road. Fire trucks would be able to perform services at the Project Site from the street frontages, while ambulances would be able to enter the Project Site parking areas at any of the three Project driveways. Parking garages are not typically designed to accommodate fire trucks, and buildings are designed with sprinkler systems to combat interior fires. The Project would not create a substandard roadway width.

Comment 14-3

2) Please confirm the proposed parking spaces in Table 2-1 comply the Uniform Building Code, Federal Accessibility Guidelines, CALGreen code and Culver City Building code.

a. In Table 2-1, indicate handicap spaces for both residential and commercial parking.

b. In Table 2-1, indicate EV charging stations and EV-ready spaces for both residential and commercial spaces.

c. In Table 2-1, indicate guest parking spaces for residents. Per City Building code, 58 guest parking spaces shall be provided (i.e., 1 space for every 4 residential units).

Clearly show in Table 2-1 if all spaces of items a. through c. are included in the listed 308 spaces (residential parking) and 311 spaces (commercial parking) or they shall be added now.

3) When code required parking spaces in item 2) cannot be met, alternatives 2 and 3 of lower scale development shall be considered to ensure code mandated parking spaces are provided.

Response to Comment 14-3

Parking is not considered a CEQA issue. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Nonetheless, as discussed on page 2-21 in Chapter 2, Project Description, of the Draft EIR, the Project will provide 15 Americans with Disabilities Act (ADA) compliant parking spaces, 66 parking spaces with EV-chargers, and 66 additional EV-ready parking spaces according to CCMC. The exact locations of these spaces will be determined as construction plans for the Project are developed.

Refer to Response to Comment 10-4 regarding the Project's use of the California Government Code residential parking minimum rates as they relate to guest parking.

Comment 14-4

4) Please confirm 34 subterranean parking spaces to replace ECF surface parking spaces can accommodate larger school buses. It does not make sense to give parking spaces back to ECF with designated parking spaces/ location where a height limitation will not work for larger school buses in operation. The school buses will utilize Heritage Park community for parking if they are not fully taken care of. Alternative 2 would preserve the existing ECF surface parking while avoiding rezoning for the northernmost parcel. In re-reading section 2.4, there is still no good justification in converting residential single-family zone (R-1) to commercial general (CG) use for the northernmost parcel.

Response to Comment 14-4

Parking is not considered a CEQA issue. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Page 2-21 in Chapter 2, Project Description, of the Draft EIR provides a description of the Project's parking supply. It is correct that the Project would dedicate 34 parking spaces within the residential parking garage for ECF staff. These parking spaces would not, however, accommodate large

school buses. It is anticipated that ECF staff would park within the Project's garage and school buses would park on the ECF campus.

The comment regarding the zone change request is noted and will be provided to the decision-makers for their consideration. However, note that the Project is proposing to change the zoning designations for the Project Site, including the northernmost parcel that is currently zoned R-1, to "Planned Development" (PD), not General Commercial use. The PD designation requires adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site.

Refer to Response to Comment 14-4, below, regarding Alternative 2.

Comment 14-5

5) Overall speaking, the size and scale (5-story building of 67 feet tall and 88,000 cubic yards of earthwork) of the Project does not fit in the neighborhood. Not only construction safety, phasing and staging are real challenges, the development is not supported by the vast majority of the community. This is clearly reflected in Appendix A-4 Comments of the NOP. Alternatives 2 and 3 of lower scale development should be considered.

Response to Comment 14-5

The commenter to consider Alternatives 2 and 3 of the Project is noted. Chapter 5, Alternatives, of the Draft EIR, which evaluates alternatives to a project that can either eliminate significant adverse environmental impacts or substantially reduce them, includes an analysis of the impacts under Alternative 2 and 3 and how those impacts compare to the Project. As discussed therein, Alternative 2, the Code-Compliant Alternative, and Alternative 3, the Reduced Density Alternative, would both involve less excavation and development compared to the Project, and both alternatives would reduce the Project's less-than-significant or less-than-significant-with-mitigation impacts related to construction (e.g., air quality, archaeological and paleontological resources, and noise). However, both alternatives would only partially meet a majority of objectives and not meet other objectives. As Alternative 2 would not develop affordable housing units, would not include a grocery store, or provide Machado Park, objectives related to these components of the Project would not be met. As Alternative 3 would not provide the Machado Park as part of its development program, the objective related to Machado Park would not be met.

Comment 14-6

6) FCMP should also address how the haul routes/ City public roads will be repaired during and after months of heavy construction traffic.

Response to Comment 14-6

This comment that the FCMP should address repair of public roads due to construction related traffic, does do not raise a substantive issue regarding the adequacy of the Draft EIR, nor does it provide any substantial evidence that the Project would damage public roads. However, it should

be noted that repairs are required by the City in the immediate right-of-way and surrounding sidewalks for any damage incurred during construction of the Project.

Comment 14-7

7) Page ES-20 states prior to approval of the FCMP, one community meeting shall be conducted. If only one meeting is required, how can the public have an opportunity to verify if comments received from the first community meeting are indeed incorporated in the FCMP?

Response to Comment 14-7

This comment regarding the public process for the FCMP that will be prepared for the Project is noted. As indicated in the Project Design Feature (PDF-TRAF-1), Final Construction Management Plan, topics to be discussed at the community meeting include community notification procedures, and as also stated, the FCMP will include the name and phone number of a contact person who can be reached 24 hours a day for complaints or other construction related issues. In addition, the FCMP will be available for review by the public at the City.

Comment 14-8

8) If Project construction will take place, as an impacted resident, I would appreciate to have a break from construction noises and traffic on Sundays and federal holidays. The daily construction impacts if nonstop for over months/ years will drive the neighborhood residents crazy. Please allow at least one quiet day weekly.

Response to Comment 14-8

Chapter 9.07 of the CCMC provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours. The Project would comply with municipal code requirements, which includes potential construction activity on Sundays and Federal holidays.

Construction noise would fluctuate throughout the construction day depending on the particular type, number, and duration of use of various pieces of construction equipment, as discussed further on page 4.8-24 in Chapter 4.8, Noise, of the Draft EIR. As noted on page 4.8-17 in Chapter 4.8, Noise, of the Draft EIR, construction noise was analyzed assuming that all pieces of equipment would be operated simultaneously. Therefore, the Draft EIR includes conservative, worst-case estimates of potential construction noise levels affecting nearby receptors. Additionally, as discussed on pages 4.8-52 and 4.8-53 in Section 4.8, Noise, of the Draft EIR, mitigation measures NOISE-1 and NOISE-2 would require the use of sound barriers and muffler systems to reduce the levels of construction noise impacting neighboring receptors. As shown on Table 4.8-19, mitigated construction noise levels would not exceed ambient noise levels by greater than 1.7 dBA, which would be barely perceptible, according to the Caltrans Technical Noise Supplement. Therefore, although construction could potentially occur on Sundays and federal holidays, construction noise

would be minimized through implementation of mitigation measures and worst-case increases in ambient noise would not be perceptible. Also refer to Response to Comment 14-6, above, regarding the FCMP and opportunities for further public input and compliant procedures.

Comment 14-9

9) In Table 2-2, how do we know if 50dBA Leq from 10pm to 7am is proper? Figure 4.8-1 says 50dBA Leq is for Urban daytime. It is also unclear what's the allowed L_{max} for night work? It is crucial that the noise limits (both average and maximum) are capped as one noise spike at night can wake up neighborhood residents. Additionally, Heritage Park has many young children and Temple Akiba has many preschool aged children who take naps during the day. The maximum noise shall be limited during the day too.

Response to Comment 14-9

As discussed above in Response to Comment 14-7, Chapter 9.07 of the CCMC provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours.

As the CCMC does not identify any specific noise limits during the permitted construction hours, there is no limit identified for either L_{eq} or L_{max}. However, construction is prohibited during nighttime hours between 8 P.M. and 8 A.M. the next day from Mondays through Fridays, from 7 P.M. to 10 A.M. Saturdays, and from 7 P.M. to 8 A.M. on Sundays. Therefore, no sleep disturbance would occur in the middle of the night.

Construction noise would fluctuate throughout the construction day depending on the particular type, number, and duration of use of various pieces of construction equipment, as discussed further on page 4.8-24 in Chapter 4.8, Noise, of the Draft EIR. As noted on page 4.8-17 in Chapter 4.8, Noise, of the Draft EIR, construction noise was analyzed assuming that all pieces of equipment would be operated simultaneously. Therefore, the Draft EIR includes conservative, worst-case estimates of potential construction noise levels affecting nearby receptors. Additionally, as discussed on pages 4.8-52 and 4.8-53 in Section 4.8, Noise, of the Draft EIR, mitigation measures NOISE-1 and NOISE-2 would require the use of sound barriers and muffler systems to reduce the levels of construction noise impacting neighboring receptors. As shown on Table 4.8-19, the worst-case mitigated construction noise level of 64 dBA L_{eq} at Temple Akiba (receptor R6) would be lower than the ambient noise level of 65.2 dBA L_{eq}. The worst-case mitigated construction noise level of 66 dBA L_{eq} at Heritage Park (receptor R3) would be 1.7 dBA L_{eq} above the ambient noise level, which would be barely perceptible, according to the Caltrans Technical Noise Supplement. Therefore, although construction would occur while preschool aged children could be napping, construction noise would be minimized through implementation of mitigation measures and worst-case increases in ambient noise would not be perceptible.

Comment 14-10

10) With implementing parking pricing for spaces within the Project site for office employees, some will choose to drive and park in the Heritage Park community to avoid paying for a parking spot. Similarly, the residential guests and/or shoppers can utilize the Heritage Park community across the street for parking. The developer should plan to install and pay for a gate arm/ access control at Heritage Park vehicle entrance(s) if other measures to eliminate these unwanted parking cannot be incorporated in design.

Response to Comment 14-10

As mentioned on page 4.11-25 in Section 4.11, Transportation, and page 15 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project will be preparing a TDM Program to be completed prior to occupancy, as required by Mitigation Measure TRAF-1. The TDM Coordinator will oversee and monitor the TDM Program to ensure that office use employees are following the rules and regulations. Office use employees would be required to provide proof that they are adhering to the spirit and intent of the mitigation measure. The City of Culver City will also enforce compliance with the TDM Program.

The comment regarding a desire for parking gate arms in Heritage Park does not relate to a specific CEQA topic area or threshold. Nonetheless, installation of parking gate arms at Heritage Park vehicle entrances would conflict with access for emergency services, postal mail trucks, and delivery trucks. Refer to Response to Comment 6-2 regarding proposed measures to discourage cut-through traffic and Project Site parking in the Heritage Park neighborhood.

Comment 14-11

11) As commented in the public meeting, Figure 2-3 shows a suicidal site layout. A shared left turn lane invites collisions. Heritage Park community requests to preserve our existing left turn lane along Machado. Should Project desire a left turn lane to its residential entrance, a separate left turn lane must be designed. A physical barrier should be installed between the two left turn lanes to enhance safety and to eliminate direct cut through traffic between the Project residential entrance and the Heritage Park entrance.

Response to Comment 14-11

Refer to Response to Comment 6-2, above, regarding proposed modifications to the Machado Road/Heritage Place/Project driveway intersection operations.

Comment 14-12

12) The existing center median on Machado Road should be preserved as much as possible towards Jefferson, along with the installation of traffic armadillos beyond the end of the preserved median (and appropriate signage and yellow striping). This will eliminate U-turns on Machado (for safety) but still permits the delivery truck movements.

Response to Comment 14-12

Refer to Response to Comment 6-2, above, regarding proposed modifications to the Machado Road/Heritage Place/Project driveway intersection operations.

Letter 15

Khin Khin Gyi
10733 Kelmore Street
Culver City, CA 90230

khin.khin.gyi10733@gmail.com

Email received on June 21, 2021

Comment 15-1

I am submitting my comments about the project at 11,111 Jefferson Boulevard in my attachment below. Thank you in advance for your consideration.

Response to Comment 15-1

This comment provides a general introduction to the comments raised in this correspondence. Responses to the specific comments raised are provided below in Responses to Comments 15-2 through 15-6.

Comment 15-2

Evaluation of the dEIR at 11,111 Jefferson Blvd.

The draft EIR essentially describes the possible variations of mixed-use multi- family housing options that could be built at the corner of Sepulveda and Jefferson Boulevards. It proposes to build 230 residential units out of which 19 are to be "affordable to very low income units," but does not give an exact breakdown of how many will be affordable or how many will be low income units. This does not help the City meet its RHNA goals.

Response to Comment 15-2

Housing was addressed in Section 4.9, Population and Housing, of the Draft EIR. Regarding the statement that the Project would not help the City meet its RHNA goals, Section 4.9, Population and Housing, of the Draft EIR includes an analysis of the Project's consistency with the RHNA. As discussed therein, the Culver City October 2013-2021 Housing Element, which is based on the 5th Cycle RHNA allocations, indicates the total housing growth need for the City during this planning period is 185 units. The 185 units represents the City's share of the RHNA approved by SCAG as a response to State-mandated housing planning. While the City has already met the 2013-2021 Housing Element goal of providing 185 households during this planning period, the City did not achieve the goals for affordable housing provisions within the 185 households. The Project's provision of 230 multi-family residential units, 19 of which would be for the Very Low income category, would assist the City in meeting the affordable household goals provided in the 2013-2021 Housing Element.

In addition to the 2013-2021 Housing Element, the City is currently in the process of updating its Housing Element to comply with State law, and support consistency with the housing needs for the City established in the 6th Cycle RHNA allocations. These allocations, which are pending HCD approval, show the City's allocation of housing between October 2021 and October 2029 to be 3,341 units. Accordingly, the Project's proposed housing would constitute 6.9 percent of the 6th Cycle RHNA allocations between 2021 and 2029. Therefore, the Project would promote fulfillment of the City's future updated Housing Element goals and the 6th Cycle RHNA allocation.

The comment regarding the level of affordability does not raise a question about the substance of the Draft EIR and is not a CEQA issue. Nonetheless, as required by California Government Code Section 65915(b)(1)(B), the 19 very low income households will meet the definition set forth in Section 50105 of the Health and Safety Code. That section states:

""Very low income households" means persons and families whose incomes do not exceed the qualifying limits for very low income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. These qualifying limits shall be published by the department in the California Code of Regulations as soon as possible after adoption by the Secretary of Housing and Urban Development. In the event the federal standards are discontinued, the department shall, by regulation, establish income limits for very low income households for all geographic areas of the state at 50 percent of area median income, adjusted for family size and revised annually."

Comment 15-3

Of the alternatives proposed, Alternative 2 is the code-compliant alternative with a height of 56 feet and no subterranean parking, but there will be only 114 residential units without specification as to how many will be low income units that will allow us to meet our RHNA goals. Alternative 3 which is touted as the Reduced Density Alternative with 184 residential units and 9 units that will be affordable to very low income households will have a height of 67 feet which exceeds the height limit in our code of 56 feet.

Response to Comment 15-3

Alternatives are addressed in Chapter 5, Alternatives, of the Draft EIR. Regarding the comment that the Draft EIR does not indicate how many units would be low income under Alternative 2, refer to page 5-30 in Chapter 5, Alternatives, of the Draft EIR and the discussion under the heading Population and Housing, which states that the alternative would not include affordable units, and that it would not contribute to meeting the City's RHNA goals to the same extent as the Project. The comment regarding the height of the building under Alternative 3 is noted and correctly reflects the content of the Draft EIR. Also note that the provision of 19 very low income households qualifies the Project for a concession/incentive under California Government Code Section 65915 that would allow the proposed increase in maximum height from 56 feet to 67 feet or five stories (70.5 feet with the parapet). The City is mandated under state law to approve this height increase.

Comment 15-4

The number of environmental impacts that are significant, especially occurring within half a mile of sensitive receptors, such as an elementary school include:

1) exceeding the SCAQMD significance threshold for NOx,

2) generating short-term TAC emission from Diesel Particulate Matter that would exceed the health risk threshold for cancer risk,

3) exceeding the City's threshold for daily work VMT (vehicle miles traveled) per employee for the office uses,

4) contributing to exceeding the CAAQS (California Ambient Air Quality Standards) 1-hr and 8-hr carbon monoxide standards,

5) exceeding SCAQMD localized construction emission thresholds for NOx, PM10 & PM2.5.

Response to Comment 15-4

The air quality effects raised in the comment were addressed in Section 4.1, Air Quality, of the Draft EIR, and the VMT analysis cited was addressed in Section 4.11, Transportation, of the Draft EIR. While it is accurate that the Project would exceed significance thresholds for NOx, health risk, and localized emission thresholds for NOx, PM10, and PM2.5, the comment does not note, as analyzed on pages 4.1-55 through 4.1-58 in Section 4.1, Air Quality, of the Draft EIR, that with implementation of the mitigation measures proposed, all air quality impacts would be reduced to less than significant levels. Similarly, while the VMT impact is noted, as with air quality, this impact would be mitigated to a less than significant level, as reflected in the analysis provided in Section 4.11, Transportation, of the Draft EIR.

Comment 15-5

In Table 4.1-9 on p. 131, we learned that the unmitigated maximum health risk for off-site sensitive receptors include a cancer risk of 76.12 for residential folks and a risk of 73.60 for school students, both of which exceed SCAQMD significance threshold of 10. In table 4.1-12 on p. 137, even with mitigation, the cancer risk would remain above the regulatory threshold for residential receptors.

Response to Comment 15-5

Health risk was addressed in Section 4.1, Air Quality, of the Draft EIR. As shown in **Table 4.1-12**, *Mitigated Maximum Health Risk Impacts for Off-Site Sensitive Receptors,* with the implementation of Mitigation Measure AIR-1, cancer risk would remain above the regulatory threshold for residential receptors, as indicted in the comment. However, the discussion on page 4.1-57 in Section 4.1, Air Quality, of the Draft EIR, goes on to state that with implementation of Mitigation Measures AIR-1 and AIR-2, cancer risk would be reduced to below regulatory thresholds of significance for both residential and school receptors. Therefore, the Project would result in less than significant impacts with implementation of mitigation. While cancer risk exceeds

the threshold prior to implementation of Mitigation Measures AIR-1 and AIR-2, the cancer risk was based on the assumption that the worst day scenario for each construction phase occurs every day, representing a highly conservative risk estimate. When accounting for the typical daily activities that occur on the Project Site, the average daily emissions would be lower than what was used to quantify risk. Therefore, since the conservative risk scenario was reduced to below regulatory thresholds with implementation of mitigation measures, the actual risk based on an average construction day would also be below the regulatory threshold and would most likely be substantially lower than the risk presented in Table 4.1-12.

Comment 15-6

For the reasons stated above, the risk benefit ratio does not favor the City of Culver City, nor will it allow us to meet our RHNA goals. Furthermore, it would expose the residents of Culver City, especially those living next to the project such as the residents of Sunkist Park and the sensitive receptors attending the nearby elementary school within half a mile of the project to unacceptable cancer risk. If the project were to be green-lighted, it would be unconscionable. Please do not approve this project for the reasons enumerated above.

Response to Comment 15-6

As indicated in Responses to Comments 15-2, and contrary to the comment, the Project would support and would not impede City attainment of its RHNA goals. Regarding the reference to what is stated as unacceptable cancer risk, refer to Response to Comment 15-5, above. Note that the potential for cancer risk used in the analysis provided in Section 4.1, Air Quality, of the Draft EIR, was based on a conservative analysis and potential impacts would be reduced to less than significant levels. Nonetheless, the opposition to the Project is noted and will be provided to the decision-makers for their consideration.

Letter 16

Laurel Busby
laurelsjunk@yahoo.com

Email received on June 21, 2021

Comment 16-1

I recently read an article about a new project at Jefferson and overland with more than 230 units, only 19 of which will be reserved for very low income tenants. I don't think that's enough low-income units, and I also think tenants who work in the surrounding malls and businesses or nearby schools should be given preference to reduce the traffic congestion that would accompany such a large complex. If employees at the mall across the street or who work in the new complex could afford the apartments, they could help alleviate congestion potentially rather that increasing it.

Response to Comment 16-1

As indicated in Chapter 2, Project Description, of the Draft EIR, of the 230 residential dwelling units proposed by the Project, 19 units are slated as affordable to very low income households. Regarding the interest in seeing more low to moderate housing units included in the Project, the comment is noted and will be provided to the decision-makers for their consideration. In addition, as discussed in Section 4.9, Population and Housing, of the Draft EIR, the Project would support and not conflict with relevant goals, objectives and policies of the General Plan for increasing the supply of housing and affordable house through the use of State and local incentives. The comment regarding suggested preferences that should be made for certain types of tenants, this is not an issue related to the content and analyses in the Draft EIR, therefore, further response is not warranted. Regarding concerns about traffic, the Draft EIR addressed transportation impacts in Section 4.11, Transportation, of the Draft EIR, with supporting data and non-CEQA analysis provided in Appendix, J, Transportation Impact Study, of the Draft EIR. Furthermore, regarding traffic congestion, refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Letter 17

Brian Flynn
Lozeau Drury LLP
Sent on behalf of Supporters Alliance For Environmental Responsibility (SAFER)
1939 Harrison Street, Suite 150
Oakland, CA 94612

brian@lozeaudrury.com

Email received on June 21, 2021

Comment 17-1

Please find attached a comment submitted on behalf of the Supporters Alliance For Environmental Responsibility (SAFER) regarding the draft environmental impact report prepared for the 11111 Jefferson Boulevard Mixed-Use Project (SCH No. 2020090329).

Confirmation of receipt of this comment would be greatly appreciated.

Response to Comment 17-1

Responses to the referenced letter are provided below in Responses to Comments 17-2 and 17-3. The City confirmed receipt of this comment through an email sent on June 21, 2021.

Comment 17-2

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as 11111 Jefferson Boulevard Mixed-Use Project, including all actions related or referring to the proposed 5-story mixed-use project located at 11111 Jefferson Boulevard in the City of Culver City ("Project").

Response to Comment 17-2

This introductory comment is noted.

Comment 17-3

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER request that the Planning Division address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Response to Comment 17-3

This comment contends without any specifics or supporting evidence that the Draft EIR has shortcomings and that the City should recirculate the document prior to considering approval of the Project. While it is acknowledged that SAFER reserves the right to supplement this comment, note that as stated in Chapter 1, Introduction, of the Draft EIR, the Draft EIR was circulated for public review in compliance with the provision of CEQA Guidelines Sections 15085(a) and 15087. The City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website; (5) sent a NOA to all property owners within 1,000 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. Proof of publication is available at the Culver City Current Planning Division. The public review period commenced on May 6, 2021 and ended on June 21, 2021 for a total of 47 days. And the City specified that any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period.

Letter 18

Komalpreet Toor
Lozeau Drury LLP
Sent on behalf of SAFER
1939 Harrison Street, Suite 150
Oakland, CA 94612

komal@lozeaudrury.com

Email received on June 21, 2021

Comment 18-1

Attached please find comments submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") for the project known as 11111 Jefferson Boulevard Mixed-Use Project Draft Environmental Impact Report (SCH No. 2020090329). If you have any questions please contact our office.

Response to Comment 18-1

Responses to the referenced letter are provided below in Response to Comments 17a-2.

Comment 18-2

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as 11111 Jefferson Boulevard Mixed-Use Project, including all actions related or referring to the proposed 5-story mixed-use project located at 11111 Jefferson Boulevard in the City of Culver City ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER request that the Planning Division address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Response to Comment 18-2

The comment is a duplicate of Letter 17, provided above. Refer to Response to Comments 17-2 and 17-3, above, for a response to this comment.

Letter 19

Wandy Sae-Tan
heritagepark.wandy@gmail.com

Email received on June 21, 2021

Comment 19-1

Hi Michael, I have a question about Guest Parking counts for the 11111 Jefferson project.

- The Draft EIR states on page 61: "The subterranean parking level would include 292 parking spaces for residential tenants, 16 parking spaces for residential guests."
- However, from what I understand of the Culver City Building Code, mixed-use development projects need to provide "1 space for every 4 residential units".
- Since 11111 Jefferson has 230 residential units, they should have 230 / 4 = 58 guest parking spots.
- So if they are only providing 16 guest parking, they would be missing 42 spots.

Is the project in violation of city code by missing 42 guest parking spots?

Response to Comment 19-1

Parking is not considered a CEQA issue. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Nonetheless, independent of CEQA requirements and for informational purposes only, page 66 in Appendix, J, Transportation Impact Study, of the Draft EIR provides a non-CEQA review of the Project's required parking under the CCMC and California Government Code. California Government Code Section 65915 residential parking minimum rates were used for the Project's residential parking requirements. As noted in the comment, the major difference between California Government Code and City code relates to residential guest parking spaces. Because the Project provides 19 units affordable to very low income housing, it is entitled to utilize the residential parking requirements under California Government Code Section 65915, and the City does not have authority to require more parking spaces. Although no guest parking space are required, the Project will provide 14 guest spaces within the residential parking garage. Parking for guests beyond 14 vehicles may park in the commercial garage. Also for further information regarding parking, refer to Response to Comment 10-4.

Comment 19-2

TABLE 2-1
DEVELOPMENT PROGRAM SUMMARY

Use	Size/Units
Site Area (sf/ac)	149,553 sf/3.43 ac
Existing	
United States Post Office	27,225 sf
Coco's Bakery Restaurant	6,064 sf
Valvoline Instant Oil Change	1,722 sf
Proposed	
Residential Component	
Studios	54 units
1-Bedrooms	113 units
2-Bedrooms	63 units
Residential Lobby	2,500 sf
Residential Amenity (Third Level)	2,500 sf
Subtotal Residential Units and Square Footage	*230 units (244,609 sf)*
Commercial Component	
Market	38,600 sf
Restaurant (High Turnover Sit-Down)	3,300 sf
Restaurant (Fast Casual)	4,900 sf

61 / 552 | − 92% + | ⊡ ↻

Road. Pedestrians would also be able to access the market from the Paseo Courtyard by walking past the retail uses. As shown in **Figure 2-12,** *Rendering of Pedestrian Connection at Janisann Avenue,* the Project also includes a proposed traffic signal and pedestrian crosswalk at the intersection of Janisann Avenue and Sepulveda Boulevard.

Vehicle and Bicycle Parking

Structured parking containing 653 vehicular parking spaces would be provided on the Project Site with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for ECF. The subterranean parking level would include 292 parking spaces for residential tenants, 16 parking spaces for residential guests, and 34 parking spaces for ECF, including tandem spaces. A total of 14 handicap accessible spaces would be provided, including 6 parking spaces in the subterranean parking level, 3 parking spaces on the ground floor, and 5 parking spaces on the second floor. The Project would include 132 electric vehicle (EV) capable spaces, 63 EV charging stations, and 63 EV-ready spaces. The vehicle parking spaces for residential guests would be clearly identified either by specific ground painting or wall signage/decals and would be located within the residential garage in the subterranean parking level only. All subterranean parking would be secured under an access control

CA > Culver ... > Culver City Municip... > § 17.320.020 - NUMBER OF PARKING SPACES R...

Table 3-3A	
Land Use Type: Residential	***Vehicle Spaces Required***
Multi-family dwellings and residential component of mixed-use development, includes supportive housing, transitional housing units, large family day care homes, and small family day care homes (1) (2)	Studio micro-units: 0.5 space. (4)
	Studio and 1 bedroom, up to 900 square feet: 1 space.
	Studio and 1 bedroom, greater than 900 square feet: 2 spaces.
	2-3 bedroom units: 2 spaces.
	4 bedroom units: 3 spaces.
	1 space for every additional bedroom greater than 4.
	Guest parking: 1 space for every 4 residential units.

Response to Comment 19-2

Images provided under this comment provide context for Comment 19-1, above. Refer to Response to Comment 19-1. No further responses are required.

Letter 20

Wandy Sae-Tan
heritagepark.wandy@gmail.com

Email received on June 21, 2021

Comment 20-1

Hi Michael, in the 11111 Jefferson Draft EIR, on Page 29, the TRAF-1 MM requires:

- Off-Street Parking Pricing – This strategy implements parking pricing for spaces within the Project Site for office employees. This would mean that employees of the office land use would need to pay for a parking spot within the Project Site garage, separate from the cost of the lease for the office space.

I understand the city's goal is to discourage employees from driving their own cars to work, by requiring office employees to pay for parking.

However, if employees still choose to drive their cars to work, but don't want to pay for parking, they will likely come to Heritage Park to look for all day free parking.

The streets in Heritage Park are smaller than normal city streets, with sidewalks on only one side of the streets. The Heritage Park streets were not designed to accommodate external public parking.

These employees looking for parking at Heritage Park will mean increased traffic within our community, which can cause danger to kids and pedestrians.

They will also cause increased wear and tear on our roads, which Heritage Park has to pay for (the city does not maintain our streets).

We need the city to have plans in place to protect Heritage Park, possible options include:

1. Implement permit parking within Heritage Park

2. Implement access control at Heritage Park vehicle entrances - A boom barrier (gate arm) will be enough to discourage external parking

3. Remove paid parking requirement for 11111 Jefferson office employees

Response to Comment 20-1

Cut-through traffic, street maintenance, and parking are not considered as CEQA issues. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA. As mentioned on page 4.11-25 in Section 4.11, Transportation, and page 15 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project will be preparing a TDM Program to be completed prior to occupancy (refer to Mitigation Measure TRAF-1). The TDM Coordinator will oversee and monitor the TDM program

to ensure that office use employees are following the rules and regulations. Office use employees would be required to provide proof that they are adhering to the spirit and intent of the mitigation measure. The City of Culver City will also enforce compliance with the TDM Program, and may require additional measures based on collected data after Project occupancy.

The comment regarding a desire for parking gate arms in Heritage Park does not relate to a specific CEQA topic area or threshold. Nonetheless, installation of parking gate arms at Heritage Park vehicle entrances would conflict with access for emergency services, postal mail trucks, delivery trucks, and members of the public wishing to patronize the park in Heritage Park. Refer to Response to Comment 6-2 regarding proposed measures to discourage cut-through traffic and Project Site parking in the Heritage Park neighborhood.

Removing the proposed TDM mitigation measure to require office use employees to pay for parking is expected to increase, rather than reduce the potential for off-site parking and could result in a significant VMT impact according to CEQA. Therefore, removal of the paid parking requirement in the TDM mitigation measure would not be appropriate.

Comment 20-2

On my street of 6 families, 4 of us have young children who play outside. There are many other families with young children in Heritage Park.

In the final EIR, please describe how the city will protect the safety of the Heritage Park's residents from 11111 Jefferson office employees looking for all day free parking.

Response to Comment 20-2

As indicated in the above response, the Project TDM measures would be monitored to ensure that employees park in dedicated spaces located on the Project Site. Accordingly, office employees are not expected to be looking for all day free parking in the Heritage Park neighborhood. Furthermore, regarding other pedestrian safety concerns. Pedestrian safety is analyzed in Chapter 4.11, Transportation, of the Draft EIR under the analysis for Threshold TRAF-3, starting on page 4.11-21. As determined therein, the Project would ensure that all access would be designed to the City standards and would meet the City's requirements to protect driver, bicyclist, and pedestrian safety. The Project would relocate bus stops, install a new traffic signal and pedestrian crosswalk, and eliminate seven existing driveway curb cuts, all of which would serve to reduce transportation hazards. Specifically, the Project's proposed reduction of existing curb cut driveways from ten to three would improve traffic flow and operation along Sepulveda Boulevard and Jefferson Avenue, while also improving safety by reducing potential for vehicle-vehicle and vehicle-pedestrian conflicts. The Project would also install a signalized pedestrian crossing at the intersection of Sepulveda Boulevard and Janisann Avenue, which would improve pedestrian crossing safety and access in the area. Refer to Response to Comment 6-2 regarding proposed measures to discourage cut-through traffic and Project Site parking in the Heritage Park neighborhood.

Letter 21

Wandy Sae-Tan
heritagepark.wandy@gmail.com

Email received on June 21, 2021

Comment 21-1

Hi Michael, I had sent in the following concern back in Oct 2020, but I did not see it addressed in the 11111 Jefferson Draft EIR:

Street, Sidewalk, and Bus Stop Trash: The new development will draw a lot more foot traffic and bus stop usage to the neighborhood, bringing increased trash in public spaces and causing sanitation concerns.

What is the city's plan to handle increase [sic] workload to:

c. clean the street, sidewalk, and bus stops on the 11111 Jefferson triangle?

d. clean the street, sidewalk, and bus stops north of the project on Jefferson (Jefferson / Dobson)?

e. clean the street, sidewalk, and bus stops north of the project on Sepulveda (across from Studio Village)?

Please ensure the city addresses the concern in the final EIR? Thank you.

Response to Comment 21-1

As discussed on page 2-23 in Chapter 2, Project Description, on pages 4.11-13, in Section 4.11, Transportation, and on page 13 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project would provide trash cans as part of a larger suite of bus stop amenities at the relocated bus stops in front of the Project Site. Bus stops would be maintained by Culver City Bus as part of their normal workload, and these relocated bus stops would not increase the amount of trash service needed. Street sweeping would be performed by Culver City, and the Project is not proposing an increase in the mileage of public streets and sidewalks that would need regular cleaning.

Letter 22

Wandy Sae-Tan
heritagepark.wandy@gmail.com

Email received on June 21, 2021

Comment 22-1

Hi Michael, in the 11111 Jefferson Draft EIR, I did not see any plans to project Heritage Park from the risk of cut-through traffic brought on the 11111 Jefferson project.

The 11111 Jefferson project is meant to be a community destination, with grocery stores, shops, public parks, and 230 residential units --- all that will bring a significant amount of vehicle traffic.

And with increased vehicle traffic, there will be increased traffic congestion, as well as frustrated drivers trying to find ways to cut-through that congestion.

I understand the EIR's traffic study shows that we did not and will not have any traffic congestions. But you have already heard from many residents in the community, that is simply false.

Traffic congestions on Sepulveda and Jefferson are real, and the 11111 Jefferson project will make it worse.

I understand the city has a vision and mobility plans to reduce vehicle congestions. But until that vision becomes a reality, we need the city to have plans in place to protect Heritage Park from cut-through traffic.

Possible options include:

1. Reduce the scale of the project
2. Add "No Outlets" sign
3. Implement access control at Heritage Park vehicle entrances - A boom barrier (gate arm) will be enough to discourage cut-through traffic

In the final EIR, please describe how the city will protect the safety of the Heritage Park's residents from cut-through traffic.

Response to Comment 22-1

Cut-through traffic and congestion are not considered CEQA issues for transportation. Refer to Topical Response TR-1 regarding comments that do not relate to a threshold of significance used to assess transportation impacts of the Project under CEQA.

Nevertheless, the comment states that the non-CEQA analyses in Appendix J, Transportation Impact Study, of the Draft EIR, shows that there is not and will not be any traffic congestion. That

is not accurate. Appendix J, Transportation Impact Study, of the Draft EIR acknowledged that the Project will add vehicle traffic to the surrounding street system. It did not claim that there is no traffic congestion on surrounding streets in either the existing or future conditions with or without the Project. As mentioned on page 4.11-11 in Section 4.11, Transportation, and page 13 in Appendix J, Transportation Impact Study, of the Draft EIR, the Project proposes a comprehensive suite of TDM measures to reduce vehicle trips and VMT while also building new in-fill development in urban areas, which is consistent with State transportation goals and CEQA. Mitigation Measure TRAF-1 on page 4.11-25 in Section 4.11, Transportation, of the Draft EIR lists the TDM measures to be implemented as mitigation for the CEQA VMT impact and additional TDM measures to be implemented by the Project that go beyond the CEQA-required mitigation are listed on pages 4.11-13 and 4.11-14 in Section 4.11, Transportation, of the Draft EIR and page 14 in Appendix J, Transportation Impact Study, of the Draft EIR. The Project would also provide various off-site improvements such as the design and installation of bicycle lanes on both sides of Sepulveda Boulevard in-front of the Project Site between Machado Road and Jefferson Boulevard, pay a pro-rata share towards funding for a bike lane on the northbound side of Sepulveda Boulevard from Machado Road to Ballona Creek, and the retiming of selected traffic signals near the Project Site.

In regards to protecting Heritage Park from cut-through traffic in a non-CEQA context, installation of parking gate arms at Heritage Park vehicle entrances would conflict with access for emergency services, postal mail trucks, delivery trucks, and members of the public wishing to patronize the park in Heritage Park. However, refer to Response to Comment 6-2 regarding proposed measures to discourage cut-through traffic and Project Site parking in the Heritage Park neighborhood.

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CHAPTER 3
Revisions, Clarifications, and Corrections to the Draft EIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132 (a), this Chapter of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These changes and additions are due to recognition of inadvertent errors or omissions, and to respond to comments received on the Draft EIR during the public review period. The changes described in this Chapter do not add significant new information to the Draft EIR that would require recirculation of the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

CEQA Guidelines Section 15088.5 also provides that "[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

As demonstrated in this Final EIR, the changes presented in this Chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines

Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft EIR are indicated below under the respective EIR section heading, page number, and paragraph. Paragraph reference is to the first full paragraph on the page. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline.

Chapter 1, Executive Summary

1. Pages ES-2 through ES-3, starting with the second full paragraph, revise as follows:

There are currently ten driveways surrounding the Project Site: five on Sepulveda Boulevard, three on Jefferson Boulevard, and two on Machado Road. The Project would change the locations of and remove seven driveways, resulting in three remaining driveways to serve the Project Site. Vehicular access to the Project Site would be provided from one driveway on Sepulveda Boulevard at Janisann Avenue and two driveways on Machado Road. Access for trucks and deliveries would be off of Machado Road where they would access a 2,856 sf loading dock within the Project Site via the eastern-most retail entrance. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into the Project and eastbound Machado Road, respectively.~~ This physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway would be required to turn right onto eastbound Machado Road. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions.

The Project would provide three levels of vehicular parking including one subterranean level. Structured parking containing 653 vehicular parking spaces would be provided with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for the Exceptional Children's Foundation (ECF). Bicycle parking would include 71 long-term and 26 short-term bicycle parking spaces provided in various locations throughout the Project Site. Bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level. The Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City. ~~Separate from the~~ The Project~~, the City~~

~~intends to implement~~ would also sponsor a bicycle share facility on the Project Site adjacent to the Machado Park. The bicycle share facility would allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Bicycle & Pedestrian Action Plan.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements. A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have also been included herein.

2. Page ES-5, first full paragraph, revise as follows:

Under Alternative 2, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would be developed. Similarly, Alternative 2 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into Alternative 2 and eastbound Machado Road, respectively.~~ Alternative 2 would result in a FAR of 2.5:1.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

3. Page ES-5, third full paragraph, revise as follows:

Under Alternative 3, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would still be developed. Similarly, Alternative 3 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into the Project and eastbound Machado Road, respectively.~~

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

Chapter 2, Project Description

1. Page 2-7, Figure 2-3, Conceptual Site Plan, shall be replaced with Revised Figure 2-3, as shown below.

Explanation for Change: Revisions to this figure reflect revised turning movements based on public comments and feedback.

2. Page 2-10, Figure 2-4, Ground Level Plan, shall be replaced with Revised Figure 2-4, as shown below.

Explanation for Change: Revisions to this figure reflect revised turning movements based on public comments and feedback.

3. Page 2-11, Figure 2-5, Second Level Plan, shall be replaced with Revised Figure 2-5, as shown below.

Explanation for Change: Revisions to this figure reflect revised turning movements based on public comments and feedback.

4. Page 2-12, Figure 2-6, Third Level Plan, shall be replaced with Revised Figure 2-6, as shown below.

Explanation for Change: Revisions to this figure reflect revised turning movements based on public comments and feedback.

5. Page 2-20, starting with the third full paragraph, revise as follows:

The Project would provide new 8-foot sidewalk, curb, and street trees on the southern edge of Machado Road. At the proposed residential driveway on Machado Road, the Project would ~~remove~~ modify portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into the Project and eastbound Machado Road, respectively.~~ This physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway would be required to turn right onto eastbound Machado Road. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions.

At the proposed commercial driveway on Machado Road, the Project would remove portions of the median to allow for ~~all possible turning movements and~~ a westbound left-turn lane into the Project Site. Left-turns from the Project Site commercial driveway onto westbound Machado Road would be prohibited. This would result in the removal of the existing eastbound left-turn lane at the Machado Road and Jefferson Boulevard intersection. The Project would convert the left side through lane on Machado Road to an eastbound left-turn lane and the other through lane would become an eastbound shared through-right lane as the roadway approaches Jefferson Boulevard.

SOURCE: AO, 2021

11111 Jefferson Boulevard Mixed-Use Project

Revised Figure 2-3
Conceptual Site Plan

ESA

SOURCE: AO, 2021

11111 Jefferson Boulevard Mixed-Use Project

Revised Figure 2-4
Ground Level Plan

ESA

SOURCE: AO, 2021

11111 Jefferson Boulevard Mixed-Use Project

Revised Figure 2-5
Second Level Plan

ESA

SOURCE: AO, 2021

11111 Jefferson Boulevard Mixed-Use Project

Revised Figure 2-6
Third Level Plan

ESA

Off-Site Access and Circulation

In addition to proposed improvements on Machado Road, the Project would provide a raised curb extension at the intersection of Ballona Lane and Jefferson Boulevard that would prohibit vehicular entry except for emergency vehicles into the Heritage Park neighborhood from Jefferson Boulevard, and only allow for eastbound right-turns from Ballona Lane out of the neighborhood.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. Revisions herein reflect the revised turning movements as well as a revision for consistency with Section 4.11, Transportation, of the Draft EIR, and added discussion related to off-site access and circulation.

6. Pages 2-20 through 2-21, starting with the last paragraph, revise as follows:

Bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level. The Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City. ~~Separate from the~~ The Project~~, the City intends to implement~~ would also sponsor a bicycle share facility adjacent to the Machado Park. The bicycle share facility would allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Bicycle & Pedestrian Action Plan.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

- Page 2-21, second full paragraph, second sentence revise as follows:

The subterranean parking level would include 292 parking spaces for residential tenants, ~~16~~ 14 parking spaces for residential guests, and 34 parking spaces for ECF, including tandem spaces.

Explanation for Change: This revision addresses a typographical error and brings the project description consistent with Appendix J, Transportation Impact Study, of the Draft EIR.

Section 4.5, Greenhouse Gas Emissions

1. Page 4.5-40, second full paragraph, revise as follows:

Additionally, bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available throughout the Project Site and bicycle lockers would be provided for residents in the subterranean parking level. The Project would ~~establish~~ design and

install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City. ~~Separate from the~~ The Project~~, the City intends to implement~~ would also sponsor a bicycle share facility adjacent to the Machado Park located along Machado Road between Sepulveda Boulevard and Jefferson Boulevard. The bicycle share facility would allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Action Plan.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

Section 4.7, Land Use and Planning

1. Page 4.7-23, third and fourth full paragraph, revise as follows:

The Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

~~Separate from the Project, the~~ The City ~~is considering implementing~~ will also sponsor a bicycle share facility on the Project Site adjacent to the Machado Park. The bicycle share facility would allow users to connect to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Action Plan.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

Section 4.11, Transportation

2. Page 4.11-13, first full paragraph, revise as follows:

The Project's site design includes implementation of pedestrian network improvements throughout and around the Project Site including sidewalk improvements on all Project frontages, internally linking all uses within the Project Site, and connecting the Project Site to the surrounding public pedestrian network. The Project would provide new 8-foot sidewalk, curb, and street trees on the southern edge of Machado Road. At the proposed residential driveway on Machado Road, the Project would ~~remove~~ modify portions of the median to allow for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~However, a channelizing island would be installed on the Heritage Park approach to prevent southbound through and left-turns from the residential neighborhood into the Project Site and to eastbound~~

~~Machado Road.~~ This physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway would be required to turn right onto eastbound Machado Road. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions. At the proposed commercial driveway on Machado Road, the Project would remove portions of the median to allow for a turn pocket serving westbound left-turns into the Project Site. Left-turns from the Project Site onto westbound Machado Road would be prohibited. This would result in the removal of the existing eastbound left-turn lane at the Machado Road and Jefferson Boulevard intersection. The Project would convert the left side through lane on Machado Road to an eastbound left-turn lane and the other through lane would become an eastbound shared through-right lane as the roadway approaches Jefferson Boulevard.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

1. Page 4.11-14, fourth bullet point, revise as follows:

- Bicycle Lanes – The Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

2. Page 4.11-17, Table 4.11-1, Policy 3B, revise as follows:

3.B. Expand the bicycle system to include loops which connect the Ballona Creek Bicycle Path to activity centers in the City.	**No Conflict.** As part of the Project's voluntary TDM measures, the Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

3. Page 4.11-19, Table 4.11-2, Action HS-4.1, revise as follows:

HS-4.1. Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.	**No Conflict.** The Project would ~~establish~~ design and install signing and striping for bicycle lanes along both sides of the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as pay a pro-rata share towards funding for ~~the design and construction of~~ a bike lane~~s~~ on the northbound side of Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

Explanation for Change: A clarification regarding proposed bicycle lanes as well as funding for off-site improvements proposed under the Project have been included herein.

4. Page 4.11-22, second full paragraph, first bullet point, revise as follows:

The Project would eliminate seven of the ten existing driveways. Three driveways would provide vehicular access to/from the Project Site:

- Residential-only driveway leading to the underground parking on Machado Road opposite the Heritage Place intersection. This driveway would also serve the ECF parking. ~~Based on community consultation, a channelizing island would be installed to prevent southbound through movements from Heritage Place into the residential driveway, as well as southbound left-turn movements.~~

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

Chapter 5, Alternatives

1. Page 5-3, third full paragraph, revise as follows:

There are currently ten driveways surrounding the Project Site: five on Sepulveda Boulevard, three on Jefferson Boulevard, and two on Machado Road. The Project would change the locations of and remove seven driveways, resulting in three remaining driveways to serve the Project Site, thereby reducing the potential for pedestrian/vehicular conflicts and interruption of traffic flows on adjacent roadways. Vehicular access to the Project Site would be provided from one driveway on Sepulveda Boulevard at Janisann Avenue and two driveways on Machado Road. Access for trucks and deliveries would be off of Machado Road where they would access a 2,856 sf loading dock within the Project Site via the eastern-most retail entrance. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into the Project and eastbound Machado Road, respectively.~~ This physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway would be required to turn right onto eastbound Machado Road. Signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

2. Page 5-20, last full paragraph, revise as follows:

Under Alternative 2, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would be developed. Similarly, Alternative 2 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into Alternative 2 and eastbound Machado Road, respectively.~~ As with the Project, this physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway under Alternative 2 would be required to turn right onto eastbound Machado Road. Similar to the Project, signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions. Alternative 2 would result in a FAR of 2.5:1.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

3. Pages 5-32 through 5-33, starting with the last paragraph, revise as follows:

As discussed in Section 4.11, *Transportation,* of this Draft EIR, the Project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site, and would not have a significant impact regarding increased hazards due to geometric design features. Alternative 2, as with the Project, would reduce existing curb cuts and provide new sidewalks, driveways, and roadway improvements in and around the Project Site. Under Alternative 2, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would be developed. Similarly, Alternative 2 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into Alternative 2 and eastbound Machado Road, respectively.~~ Alternative 2, as with the Project, would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site, and would not have a significant impact regarding increased hazards due to geometric design features. Similar to the Project, Alternative 2 would contribute to overall pedestrian connectivity and walkability through enhancements to the Project Site and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 2 would be less than significant and similar to the Project.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

4. Page 5-35, third full paragraph, revise as follows:

Under Alternative 3, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would still be developed. Similarly, Alternative 3 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into the Project and eastbound Machado Road, respectively.~~ As with the Project, this physical separation would prevent conflicts between the opposing left-turns on Machado Road, and would also prohibit through and left-turning movements from either Heritage Place or the Project residential driveway. Project traffic exiting the residential driveway under Alternative 3 would be required to turn right onto eastbound Machado Road. Similar to the Project, signage and vertical delineation would also be introduced along Machado Road to reinforce turn prohibitions.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

5. Page 5-48, first full paragraph, revise as follows:

As discussed in Section 4.11, *Transportation,* of this Draft EIR, the Project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site, and would not have a significant impact regarding increased hazards due to geometric design features. Alternative 3, as with the Project, would reduce existing curb cuts and provide new sidewalks, driveways, and roadway improvements in and around the Project Site. Under Alternative 3, the proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard would be developed. Similarly, Alternative 3 would also provide the proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and ~~removal~~ modification of portions of the median to allow for turn lanes for physically separated eastbound and westbound left turns into Heritage Park and the Project Site, respectively. ~~A channelizing island would be added on the Heritage Park approach to prevent through and left-turns from Heritage Park into Alternative 3 and eastbound Machado Road, respectively.~~ Alternative 3, as with the Project, would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site, and would not have a significant impact regarding increased hazards due to geometric design features. Similar to the Project, Alternative 3 would contribute to overall pedestrian connectivity and walkability through enhancements to the Project Site and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 3 would be less than significant and similar to the Project.

Explanation for Change: Turning movements from the Project Site have changed since publication of the Draft EIR as a result of public comments and feedback. The revisions herein reflect the revised turning movements.

CHAPTER 4
Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1**, *Mitigation Monitoring Program*, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the 11111 Jefferson Boulevard Mixed-Use Project (Project) and therefore is responsible for administering and implementing the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the proposed Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis,* of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes Project Design Features (PDFs) identified throughout Chapter 4 the Draft EIR. The PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project that serve to reduce or avoid potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by CEQA Guidelines Section 15126.4. However, PDFs are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The City will have primary responsibility for monitoring and reporting the implementation of the PDFs and mitigation measures unless otherwise indicated. The PDFs and mitigation measures are identified by the impact category and number that correspond with the Initial Study, in the case of Biological Resources, and the Draft EIR.

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Air Quality				
Mitigation Measure AIR-1: Construction of the Project shall incorporate the following conditions: a. The Project shall use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater and not identified under b or c. below. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. b. During the site preparation and excavation/grading phases, watering must be conducted a minimum of 4 times per day. Alternatively, other fugitive dust emissions practices shall be implemented that will reduce fugitive dust to at least the same level. c. On-road haul trucks, including delivery and those conveying excavated material, shall not exceed 120 truck trips (round trips, or 240 one-way trips) per day.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Mitigation Measure AIR-2: At a minimum, the following equipment shall be electric or non-diesel fueled: concrete/industrial saws, cranes, forklifts, plate compactors, pumps, welders, and cement and mortar mixers. Additionally, onsite electricity shall be used to power the equipment to the greatest extent possible. Where grid electricity cannot be used, a non-diesel powered generator shall be used and use of the generator shall be limited to only those activities necessary.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Biological Resources				
Mitigation Measure BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either: 1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.	Culver City Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
avoid potential impacts to nesting birds. This would insure that no active nests are disturbed; or 2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then: a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary. b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area. Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.				
Cultural Resources				
Mitigation Measure ARCH-1: Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). The frequency of monitoring shall be determined based on the factors presented above, and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Mitigation Measure ARCH-2: Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from a Gabrielino Tribe. The appropriate Native American tribal monitor shall be selected based on ongoing consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American monitor shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. The frequency of monitoring shall be determined based	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
on the factors presented above, and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.				
Mitigation Measure ARCH-3: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Mitigation Measure ARCH-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Geology and Soils				
Mitigation Measure GEO-1: Prior to issuance of demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter older alluvial sediments. A qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (2010). The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older alluvial sediments. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments, and are therefore likely to impact high sensitivity older alluvial sediments. Work in the upper 10 feet of the Project Site does not warrant monitoring. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Mitigation Measure GEO-2: Prior to commencement of demolition or excavation activities, the Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session, shall be carried out by the Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuant of Demolition Permit, Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Mitigation Measure GEO-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. The Paleontologist shall establish an appropriate buffer area around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Mitigation Measure GEO-4: Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
Noise				
PDF-NOISE-1 (Project Construction Schedule): Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Planning Division
PDF-NOISE-2 (Mechanical Equipment Noise): All mechanical equipment and/or ventilation systems not fully enclosed will be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dBA L_{eq} from 7:00 AM to 10:00 PM and 50 dBA L_{eq} from 10:00 PM to 7:00 AM at the neighboring property lines including the north and west property lines per sound level limits of the Culver City Noise Element.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector, and Planning Division
PDF-NOISE-3 (Construction Rules Sign): During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City, shall be posted on the Property in a location that is visible to the public. These names and telephone numbers shall also be made available to adjacent property owners and occupants to the satisfaction of the Planning Manager and Building Official.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Planning Division
PDF-NOISE-4 (Compliance with Noise Element): The following noise standards from Policy 2.A of the City's General Plan Noise Element shall be complied with at all times: A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds)	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
that are no less effective than those provided on the original equipment; B. All construction equipment shall be properly maintained to minimize noise emissions; C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors; D. Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building; and E. The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.				
PDF-NOISE-5 (Noise Control - Permanent Amplified Sound Systems): Permanent outdoor amplified sound systems that will operate on a regularly scheduled ongoing basis shall be designed so as not to result in a meaningfully perceivable increase in noise beyond the Project Site. Specifically, outdoor amplified sound systems shall not result in an increase of 3 dBA L_{eq} over existing conditions at the Project property line. All speakers shall have a minimum setback of 25 feet from the Project property line and shall be directed internally and shielding from off-site uses. A qualified noise consultant shall provide written documentation that the design of the system(s) complies with the maximum noise level.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector, and Planning Division
Mitigation Measure NOISE-1: Prior to the commencement of demolition, the Project shall provide a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 12 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north (Heritage Park Neighborhood) and west (Studio Village Town Homes), Temple Akiba, and Circle K Motel. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors to the north and west of the Project Site during the duration of construction activities. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and a Foundation Plan, Verified at Preconstruction Meeting with Culver City	Culver City Building Safety Division, Building Safety Inspector, and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Mitigation Measure NOISE-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation onsite demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Planning Division
Public Services				
PDF-FIRE-1 (Fire Protection Devices): The Project would be equipped with fire alarms, fire sprinklers, and an emergency radio response system.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit	Culver City Building Safety Division, Building Safety Inspector, Fire Prevention, Fire Inspector, and Planning Division
PDF-FIRE-2 (Submittal of Plans to CCFD for Review/Approval): Plans for the proposed new building, fire lanes and associated turnarounds, fire hydrant locations, and associated fire prevention/suppression equipment, will be submitted to the CCFD for review and approval.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Fire Prevention, Fire Inspector, and Planning Division
PDF-POL-1 (Project Site Security and Access During Construction): During construction of the Project the Project Site will be enclosed with security fencing, lit with security lighting, and patrolled periodically by security personnel.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Police Department, and Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
PDF-POL-2 (Project Site Security and Access During Operation): During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents, employees, and visitors. The Project's security will include, but not be limited to, the following design features: a) Installing and utilizing a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. b) Full-time security personnel. Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings, including parking; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with CCPD, as necessary. c) Staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. d) Controlled access to all residential units, lobby areas, and residential common open space areas through the use of key cards, site security and/or other means, as appropriate. e) CCTV surveillance within the parking garage, ground floor levels, and open space areas. f) Lighting of entry-ways, publicly accessible areas, parking areas, and common building and open space residential areas.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector, Police Department, and Planning Division
Transportation				
PDF-TRAF-1 (Construction Management Plan): A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Traffic Engineer, Civil Engineer, and Current Planning Manager, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by City's Fire and Police Departments. The City Building Official, City Engineer, City Traffic Engineer, Civil Engineer, and Current Planning Manager, as	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and On-going during Construction	Culver City Planning, Public Works, Fire and Police Departments

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
applicable, would reserve the right to reject any engineer at any time and to require that the FCMP be prepared by a different engineer. Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community: • Construction schedule and hours. • Framework for construction phases. • Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase). • Potential location of construction parking and office trailers. • Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). Use of Janisann Avenue to the west of the Project Site by haul trucks, material deliveries or construction worker vehicles shall be specifically prohibited. • Emergency access plan. • Demolition plan. • Staging plan for the concrete pours, material loading and removal. • Crane location(s). • Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).				

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

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.				
Mitigation Measure TRAF-1: The Project shall implement a Transportation Demand Management (TDM) Program to reduce the VMT impacts from office uses. The TDM Program shall be reviewed and approved by the City's Planning Division, Public Works Mobility and Traffic Engineering, Division and Transportation Staff for review prior to the issuance of the first building permit for the Project. The TDM Program shall include the following measures and strategies: • Commute Marketing Program – This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. At a minimum, this strategy includes educational and promotional materials, and a TDM Coordinator from building management to oversee the TDM program, such as field questions, manage regular updates of transportation materials for the Project Site, and coordinate carpool and ridesharing options. • Off-Street Parking Pricing – This strategy implements parking pricing for spaces within the Project Site for office employees. This would mean that employees of the office land use would need to pay for a parking spot within the Project Site garage, separate from the cost of the lease for the office space.	Condition of Approval	Approval of Plan	Prior to issuance of Building Permit	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Planning Division