

Appendix A
**Comments Received on
the Draft EIR**

Jacqueline De La Rocha

From: Gibson, Emily@DOT <Emily.Gibson@dot.ca.gov>
Sent: Monday, June 21, 2021 10:26 AM
To: OPR State Clearinghouse
Cc: Allen, Michael
Subject: SCH # 2020090329, 11111 Jefferson Boulevard Mixed-Use Project
Attachments: Response Letter_GTS # 07-LA-2020-03580.pdf

Hello,

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.

1-1

Best regards,

Emily Gibson

Associate Transportation Planner, Local Development-Intergovernmental Review

Caltrans District 7, Los Angeles

Emily.Gibson@dot.ca.gov

Work Cell Phone: 213-266-3562

Note: Due to COVID-19, I am teleworking.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 266-3562
 FAX (213) 897-1337
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 www.dot.ca.gov



*Making Conservation
 a California Way of Life.*

June 21, 2021

Michael Allen
 City of Culver City
 Planning Division
 9770 Culver Boulevard
 Culver City, CA 90232

RE: 11111 Jefferson Boulevard Mixed-Use
 Project – Draft Environmental Impact Report
 (DEIR)
 SCH # 2020090329
 GTS # 07-LA-2020-03580
 Vic. LA-405/PM: 26.31

Dear Michael Allen:

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).

1-2

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.

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.

1-3

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.

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

1-4

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.

↑
1-4

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.

1-5

Sincerely,

Frances Duong

FRANCES DUONG
Acting IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

Jessie Fan

From: Stephen Scheffler <stephen.scheffler@gmail.com>
Sent: Thursday, May 6, 2021 12:37 PM
To: Allen, Michael
Subject: Re: 11111 Jefferson Blvd Project - what a nightmare!

Thanks for your reply.
Stephen

On Thu, May 6, 2021 at 12:20 PM Allen, Michael <Michael.Allen@culvercity.org> wrote:
Thank you Mr. Scheffler,

I am in receipt of your below remarks and questions, which will be incorporated into the EIR response to comments.

Best,

Michael Allen



Michael Allen, AICP
Planning Manager
City of Culver City, Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Ph: 310.253.5727

From: Stephen Scheffler <stephen.scheffler@gmail.com>
Sent: Thursday, May 6, 2021 12:15 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: 11111 Jefferson Blvd Project - what a nightmare!

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:

2-1

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)

2-2



Comment Letter No. 2

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.

2-2

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)

2-3

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.

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.

2-4

Stephen Scheffler

The City of Culver City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

Jessie Fan

From: Kelly C. <kellyjcohen@gmail.com>
Sent: Friday, May 7, 2021 9:10 AM
To: Allen, Michael
Subject: Re: 11111 Jefferson Blvd Project

Thank you!

On Fri, May 7, 2021 at 8:27 AM Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning,

I am in receipt of your below remarks and questions, which will be incorporated into the EIR response to comments.

Unrelated to this project specifically, I also wanted to provide you with the City's ongoing effort to plan for bicycle and pedestrian improvements City-wide. Please visit <https://www.culvercity.org/City-Hall/City-Projects/Bicycle-and-Pedestrian-Action-Plan> to learn about the updated plan, which includes the option to receive email updates regarding the plan, and information on the proposed master bike plans (including a Class IV Separated Bikeway on both Jefferson Blvd, and Sepulveda Blvd.).

Best,

Michael Allen



Michael Allen, AICP
Planning Manager
City of Culver City, Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Ph: 310.253.5727

From: Kelly C. <kellyjcohen@gmail.com>
Sent: Friday, May 7, 2021 3:11 AM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: 11111 Jefferson Blvd Project

Good Morning,

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.

3-1

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.

3-2

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

Best,

Kelly Cohen
Culver City Resident

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Jessie Fan

From: Leah Lee <leahlee@zoho.com>
Sent: Sunday, May 9, 2021 3:38 PM
To: Allen, Michael
Subject: 11111 Jefferson Boulevard Mixed-Use Project Draft EIR

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.

4-1

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.

Thank you.

Leah Lee

Jessie Fan

From: Linda Shahinian <4lindashahinian@gmail.com>
Sent: Sunday, May 16, 2021 11:07 AM
To: Allen, Michael
Subject: 11111 Jefferson DEIR

Hello,

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?

5-1

Thanks,

Linda Shahinian

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

5-2

Jessie Fan

From: Ochoa, Richard <rcochoa@bclplaw.com>
Sent: Friday, May 21, 2021 12:56 PM
To: El-Guindy, Heba
Cc: Ochoa, Richard; Allen, Michael
Subject: RE: The Classics at Heritage Park Homeowners' Association -- 11111 Jefferson Blvd. Mixed Use Project and EIR

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.

6-1

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

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.

6-2

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.

6-2

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.
2. Design and fund an 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

6-3

6-4

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.



6-4

- 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.

6-5

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.

6-6

Richard



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Comment Letter No. 7

1.	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?	Anonymous Attendee		7-1
2.	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 Soil, Noise, Public Utilies and Greenhouse gas. Also, what about Earthquake concerns in the design and for emergency access and evacuation....what will be done about these?	Kimberly Ferguson	honestbuck@sbcglobal.net	7-2
3.	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?.	Arthur Kassan	artraffic@aol.com	7-3
4.	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?	Michael Laase	letsgetmiekie@aol.com	7-4
5.	Can this presentation be downloaded into the chat so that we can download it?	Kimberly Ferguson	honestbuck@sbcglobal.net	7-5
6.	Was a revised traffic study done when the programming was more complete?	Jon Graff	graffjon@gmail.com	7-6
7.	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.	Robin Turner	rturner@archaeopaleo.com	7-7
8.	Was this study conducted during the pandemic when the community was confined to thier homes?	Anonymous Attendee		7-8
9.	Have the Overland and Charnock Faults been reviewed and assessed?	Dr Tom Williams	ctwilliams2012@yahoo.com	7-9
10.	When will contsructio start and how long will it take?	Vicky Foxworth	vickyfoxworth@gmail.com	7-10
11.	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	Brian Sowell	brian_sowell@yahoo.com	7-11

Comment Letter No. 7

	impact on the traffic problems that already exist (certainly pre-Covid) on Sepulveda and Sawtelle?			↑ 7-11
12.	Why does the EIR state that their 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?	Marcelle Dicker	mrsrbsd@gmail.com	7-12
13.	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?	Brian Sowell	brian_sowell@yahoo.com	7-13
14.	My concern is after the final completed project as well. and This building and its residents will effect and impact on the peaceful enjoyment of residence and those travelling through this area.	Kimberly Ferguson	honestbuck@sbcglobal.net	7-14
15.	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 configuration etc.). Current layout invites a head to head collision at the mid point of Residential entrance and Heritage Park entrance.	Katie Chou	katiefchou@gmail.com	7-15
16.	Currently there are signals at 1) Seplv and Machado, and 2) Sepulv 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?	Mie Joness	akamatsunimei@navy.plala.or.jp	7-16
17.	There is a narrow R-1 zoning (along Merchado curb) at the nothmost parcel. What's the justification to covert R-1 zoning to General Commercial use.	Katie Chou	katiefchou@gmail.com	7-17
18.	Is your project already set in stone or can the residents still refuse the development	Anonymous Attendee		7-18
19.	Has the impact of additional residents on Culver City school district resources and capacity been studied?	Wendy Hamill	whamill@yahoo.com	7-19
20.	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?	Kimberly Ferguson	honestbuck@sbcglobal.net	7-20

Comment Letter No. 7

21.	NO, it was not! it was just said that it wasn't available when the project began, that does not mean they cannot now!	Kimberly Ferguson	honestbuck@sbcglobal.net	7-21
22.	Where will the school employees park? I believe the current parking lot will be taken away	Michelle Mata	Michelle_lrd@yahoo.com	7-22
23.	Jay - you are wrong about the development not impacting scenic views. it 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 the project and surrounding areas in Culver City very well. All options should have been considered. How can you expand on ALL of the potential 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.	Robin Turner	rturner@archaeopaleo.com	7-23
24.	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 queuing traffic is unfairly pused to Mechado, either.	Katie Chou	katiefchou@gmail.com	7-24
25.	Do you know what the square footage of the housing will be?	Kimberly Ferguson	honestbuck@sbcglobal.net	7-25
26.	individual units	Kimberly Ferguson	honestbuck@sbcglobal.net	7-26
27.	My understanding is that parking is free for the retails 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?	Anonymous Attendee		7-27
28.	If i remember correctly the initial traffic analysis rated the area with a d rating. Will the rating improve after the mitigation measures.	Bonnie Wacker	bonwack1@yahoo.com	7-28
29.	Carolyn Strauss (You): 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?	Carolyn Strauss	carolynjoys@gmail.com	7-29
30.	Will parking meters be put in on Sepulveda?	Cathy Penso	prisca56@sbcglobal.net	7-30
31.	What hours will construction be allowed?	Vicky Foxworth	vickyfoxworth@gmail.com	7-31
32.	What are the days and hours of construction?	Cathy Penso	prisca56@sbcglobal.net	7-32
33.	Can fire trucks enter/ exit Mechado retail entrance?	Katie Chou	katiefchou@gmail.com	7-33

34.	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?	Arthur Kassan	artraffic@aol.com	7-34
35.	Can you repeat those hours?	Cathy Penso	prisca56@sbcglobal.net	7-35
36.	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?	Anonymous Attendee		7-36
37.	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?	Kimberly Ferguson	honestbuck@sbcglobal.net	7-37
38.	For the northmost 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 further justification	Katie Chou	katiefchou@gmail.com	7-38
39.	Why do we need more housing apartments when there are apartments being built on all the borders of Culver City ?	Anonymous Attendee		7-39
40.	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.	Kimberly Ferguson	honestbuck@sbcglobal.net	7-40
41.	What role does the City Council play in approving this project?	Vicky Foxworth	vickyfoxworth@gmail.com	7-41
42.	During the construction period, where the construction workers going to park?	Anonymous Attendee		7-42

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Tuesday, May 25, 2021 3:18 PM
To: Tom Williams <ctwilliams2012@yahoo.com>; ESAWebinar03@esassoc.com
<esawebinar03@esassoc.com>
Cc: Paul Ferrazzi <ccfascdirector@gmail.com>
Subject: Re: Undeliverable: Fw: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and Public Meeting Draft EIR

Good afternoon,

Please note the [Published Notice](#) indicates that tonight's meeting is intended to provide (subsequent to the 3rd community meeting hosted by the applicant) a public meeting for an overview of the findings in the Draft EIR, explanation of the process for providing comments on the document, and outline the remaining process for completion of the Final EIR. Additionally, this meeting is not required, and is only intended to be informational. Anyone may submit comments on the Draft EIR in written form prior to, during, or after tonight's meeting within the circulation period of May 6 - June 21, 2021.

As noted in the notice, verbal and written comments received during the meeting on the Draft EIR will be responded to in writing as part of the Final EIR. Similarly, any comments or questions received prior to tonight or before June 21, 2021, will also be responded to in writing as part of the Final EIR.

Accordingly, specific questions about the content of the Draft EIR, studies, findings, etc. are unlikely to be addressed completely this evening, since it's an informational meeting to discuss the document contents overview, and provide information on how to submit comments and when. As previously described, and as described in the Published Notice, all responses will be incorporated into the Final EIR, per California Gov. Code Section 15088.

You may find the contact information accordingly for [City Council](#) and the names of the [Planning Commission](#) on their respective City webpages, previously hyperlinked, and with the email format of "firstname.lastname@culvercity.org".

Best,

Michael Allen



Michael Allen, AICP
Planning Manager
City of Culver City, Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Ph: 310.253.5727

From: Tom Williams <ctwilliams2012@yahoo.com>

Sent: Tuesday, May 25, 2021 2:33 PM

To: ESAWebinar03@esassoc.com <esawebinar03@esassoc.com>; Allen, Michael <Michael.Allen@culvercity.org>

Cc: Paul Ferrazzi <ccfascdirector@gmail.com>

Subject: Re: Undeliverable: Fw: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and Public Meeting Draft EIR

These are questions for tonight's meeting...comments are far more lengthy and specific

The CC flyer said submit questions for tonight's meeting not for the Public Comments on meeting and DEIR.

The responses and absence of compliance with written questions will be the reasons for a PRA Request on Thu-Fri

Please provide email contacts for Planning commissioners and City Council Members.

DR Tom Williams, PhD 1976 UC Berkeley

On Tuesday, May 25, 2021, 02:28:30 PM PDT, Allen, Michael <michael.allen@culvercity.org> wrote:

Good afternoon Mr. Williams,

Sorry I missed your call, I was in a meeting. I am in receipt of your below that will be included in the response to the Draft EIR that is currently in circulation.

Thank you,

Michael Allen



From: Tom Williams <ctwilliams2012@yahoo.com>

Sent: Tuesday, May 25, 2021 2:18 PM

To: ESAWebinar03@esassoc.com <esawebinar03@esassoc.com>; Allen, Michael <Michael.Allen@culvercity.org>

Cc: Paul Ferrazzi <ccfascdirector@gmail.com>

Subject: Re: Undeliverable: Fw: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and Public Meeting Draft EIR

I called but Michael Allan did not pick up and a message had to be left on the recorder. We will submit a PRA Request later this week.

On Tuesday, May 25, 2021, 01:01:59 PM PDT, Tom Williams <ctwilliams2012@yahoo.com> wrote:
ATTN.: [Michael Allen](mailto:michael.allen@culvercity.org), Plang. Mgr., michael.allen@culvercity.org 310.253.5727
I have tried to submit ??? No success.
Will call

Dr. Tom Williams

----- Forwarded Message -----

From: administrator@esassoc.com <administrator@esassoc.com>
To: "ctwilliams2012@yahoo.com" <ctwilliams2012@yahoo.com>
Sent: Tuesday, May 25, 2021, 12:53:15 PM PDT
Subject: Undeliverable: Fw: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and Public Meeting Draft EIR

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X-Barracuda-Envelope-From: ctwilliams2012@yahoo.com

X-Barracuda-Effective-Source-IP: sonic312-24.consmr.mail.ne1.yahoo.com[66.163.191.205]

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J-

X-Sonic-MF: <ctwilliams2012@yahoo.com>

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sonic312.consmr.mail.ne1.yahoo.com with HTTP; Tue, 25 May 2021 19:53:08 +0000
Date: Tue, 25 May 2021 19:53:06 +0000

From: Tom Williams <ctwilliams2012@yahoo.com>

To: "ESAWebinar03@esassoc.com" <ESAWebinar03@esassoc.com>

Message-ID: <1519120049.43966.1621972386662@mail.yahoo.com>

In-Reply-To: <5SuNBWgkTIy6pbm1bCMRjg@geopod-ismtpd-4-2>

References: <5SuNBWgkTIy6pbm1bCMRjg@geopod-ismtpd-4-2>

Subject: Fw: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and
Public Meeting Draft EIR

MIME-Version: 1.0

Questions/comments for DEIR 11111 Jefferson

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

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

Where are/Provide enumerations/quantifications and direct tabular comparisons

**Draft MMRP – Where are/provide specifics and enforcement and reportings (Qtrly and Online;
Provide video feeds to public.**

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.

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
cu yds, ??= 110K cy = 11,000 truck loads

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?

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?

Historic Archaeology and Hazardous Materials – 1920-1960s historic aerial
EDR has historic aerial photos have Building sites, Privies, and Trash Pits/Dumps been located?

Land Use Growth inducement
**Will project induce similar scale developments between Jefferson and Ballona Creek or between
Sepulveda and Overland**

Dr Tom Williams Citizens Coalition for a Safe Community ctwilliams2012@yahoo.com,
323-528-9682 4117 Barrett Rd. LA, Ca 90032-1712

8-1

8-2

8-3

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8-10

8-11

----- Forwarded Message -----

From: ESA Webinar03 <no-reply@zoom.us>

To: "ctwilliams2012@yahoo.com" <ctwilliams2012@yahoo.com>

Sent: Tuesday, May 25, 2021, 12:17:43 PM PDT

Subject: 11111 Jefferson Blvd Mixed-Use Project: Community Meeting and Public Meeting on the Draft EIR Confirmation

Hi Dr Tom Williams,
Thank you for registering for 11111
Jefferson Blvd Mixed-Use Project:
Community Meeting and Public
Meeting on the Draft EIR.

Please submit any questions

to: ESAWebinar03@esassoc.com

Date Time: May 25, 2021 06:00 PM
Pacific Time (US and Canada)-->
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248 7799 or +1 470 250 9358 or +1
646 518 9805 or 833 548 0276 (Toll
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Jessie Fan

From: ovibose gmail <ovibose@gmail.com>
Sent: Thursday, June 3, 2021 8:37 PM
To: Allen, Michael
Subject: 11111 Jefferson mixed use project draft EIR

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.

9-1

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.

9-2

Sincerely,
Donald White and Lisa Chang
11156 Woolford St.

5105 Cimarron Lane
Culver City, CA 90230
June 14, 2021

Mr. Michael Allen
Current Planning Manager
City of Culver City Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232

Subject: 11111 Jefferson Boulevard
Mixed Use Project Draft EIR

Dear Mr. Allen:

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.

10-1

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.

10-2

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.

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.

10-3

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.

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

10-3

10-4

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?

10-4

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"?

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.

10-5

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 curblin e was moved eastward to be centered approximately 155 west of that curblin e. 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 be 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?

10-5

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.

↑
10-5
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.

Very truly yours,

Original signed by Arthur L. Kassan

Arthur L. Kassan, P.E.
California Registered Traffic Engineer No. 152

Jacqueline De La Rocha

From: Public Comment at Culver City
Sent: Thursday, June 17, 2021 1:34 PM
To: Allen, Michael; MartinDelCampo, Ruth
Cc: Clerk, City
Subject: FW: 11111 Jefferson

Hi Allen,

FYI...

The below correspondence was received by the City Clerk’s office. Thank you.

Mimi Ferrel
City Clerk Specialist, City of Culver City



Culver City Counts!
9770 Culver Boulevard
Culver City, CA 90232
(310) 253-5854
(310) 253-5830 (fax)
mimi.ferrel@culvercity.org

From: ro10@aol.com <ro10@aol.com>
Sent: Wednesday, June 16, 2021 9:08 PM
To: City Council - external public facing <City.Council@culvercity.org>; Clerk, City <city.clerk@culvercity.org>
Subject: 11111 Jefferson

Good evening City Council,

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.

11-1

A development that size with 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.

11-2

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.

11-3

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

Thank You,

Robyn Tenensap

Jacqueline De La Rocha

From: President @ Temple Akiba <president@templeakiba.net>
Sent: Friday, June 18, 2021 5:18 PM
To: Allen, Michael
Cc: Temple Akiba - Director
Subject: 11111 Jefferson Boulevard Mixed Use Project Draft EIR comments
Attachments: Temple Akiba- Draft EIR Comment.pdf

Importance: High

Dear Mr. Allen,

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.

Sincerely,



Ira Diamond
President
Temple Akiba of Culver City
213-309-4084 (cell)

12-1



TEMPLE AKIBA
of CULVER CITY

Our light shines brighter together

Rabbi Zachary R. Shapiro
Cantor Lonee Frallich
Rabbi Allen S. Maller, Emeritus

President:
Ira Diamond

Executive Committee:
Michael Hudson, Sr.
Executive Vice President
Jeff Reynolds
VP, Administration
Morris Zlotowitz
VP, Finance
Carol Diamond
VP, Religious Practices
Scott Markowitz
VP, Education
Elizabeth Zlotowitz
VP, Membership
Johanna Besterman
VP, Development
Stella August
VP, Youth
Cathy Penso
VP, Affiliations
Marc Bauer
VP, Facilities
Verna Erez
Recording Secretary
Michael Bauer
Immediate Past President

Staff:
Jeffrey Rips
Executive Director
Ranee Bishoff
Education Director
Diane Germansky
Asst. Director of Education
Robyn Altman
Religious School Principal
Leah Penso
Youth and Resident Camp Director
Dina Hempling
Bookkeeper
Abby Kudan
Executive Assistant
Rebecca Holzberg
Administrative Assistant

June 18, 2021

Michael Allen,
Current Planning Manager,
City of Culver City

Re: 11111 Jefferson Boulevard Mixed-Use Project Draft EIR

Dear Mr. Allen,

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:

- 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:

12-2

12-3

- 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.

12-3

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.

12-4

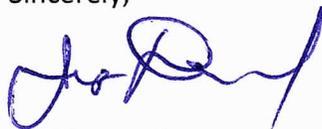
3. Noise: The project will generate lots of noise from the trucks and actual building and digging. This can be extra disruptive during school hours and on Friday nights and Saturday mornings during religious services and Sunday mornings for religious school. We request the addition of Noise Barriers/acoustic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

12-5

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.

12-6

Sincerely,



Ira Diamond

President

Temple Akiba of Culver City

213-209-4084

Jacqueline De La Rocha

From: John Yao <ichiangyao@gmail.com>
Sent: Monday, June 21, 2021 1:17 PM
To: Allen, Michael
Subject: 11111 Jefferson Boulevard Mixed-Use Project Draft EIR

Dear Michael,

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?

13-1

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.

13-2

Thanks
John

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Table with 2 columns: Project Design Feature #, Project Design Features. Rows include 4.8 Noise, PDF-NOISE-1 (Project Construction Schedule), and PDF-NOISE-2 (Mechanical Equipment Noise).

John to comment

13-3

Jacqueline De La Rocha

From: Katie Chou <katiefchou@gmail.com>
Sent: Monday, June 21, 2021 9:55 AM
To: Allen, Michael
Subject: 11111 Jefferson Boulevard Mixed-Use Project Draft EIR

Dear Mr. Allen,

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

14-1

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.

14-2

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).

14-3

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.

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.

14-4

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

14-5

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.

14-5

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

14-6

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?

14-7

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.

14-8

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 Lmax 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.

14-9

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.

14-10

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.

14-11

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.

14-12

Sincerely,

Katie Chou

Heritage Park Resident

Jacqueline De La Rocha

From: Khin Khin Gyi <khin.khin.gyi10733@gmail.com>
Sent: Monday, June 21, 2021 10:54 PM
To: Allen, Michael
Subject: Comments on the dEIR for 11,111 Jefferson Blvd.
Attachments: dEIR at Jefferson Blvd.pdf

Dear Mr. Allen:

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

15-1

Sincerely,
Khin Khin Gyi
Member, Comm. on Housing and Homelessness

Evaluation of the dEIR at 11,111 Jefferson Blvd.

The draftEIR 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.

15-2

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.

15-3

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.

15-4

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.

15-5

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.

15-6

Sincerely,
Khin Khin Gyi, M.D., Ph.D.
10733 Kelmore Street
Culver City, CA 90230

Jacqueline De La Rocha

From: Laurel Busby <laurelsjunk@yahoo.com>
Sent: Saturday, June 19, 2021 11:00 AM
To: Allen, Michael
Subject: New project at Jefferson and sepulveda

Hi,
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 than increasing it.

16-1

Best regards,
Laurel Busby

Sent from my iPhone

Jacqueline De La Rocha

From: Brian Flynn <brian@lozeaudrury.com>
Sent: Monday, June 21, 2021 2:09 PM
To: Allen, Michael
Cc: Richard Drury; Stacey Osborne; Komalpreet Toor
Subject: Comment- Draft EIR 11111 Jefferson Boulevard Mixed-Use Project
Attachments: 2021.06.21 SAFER Comment- DEIR- 11111 Jefferson Blvd Project.pdf

Dear Mr. Allen,

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).

17-1

Confirmation of receipt of this comment would be greatly appreciated.

Thank you,
Brian B. Flynn
Lozeau | Drury LLP
1939 Harrison Street, Suite 150
Oakland, California 94612
(510) 836-4200
(510) 836-4205 (fax)
brian@lozeaudrury.com

Via Email

June 21, 2021

Michael Allen
City of Culver City
Planning Division
9770 Culver Boulevard
Culver City, CA 90232
michael.allen@culvercity.org

Re: Comment on 11111 Jefferson Boulevard Mixed-Use Project Draft
Environmental Impact Report (SCH No. 2020090329)

Dear Mr. Allen:

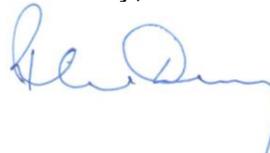
I am writing on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for the Project known as 11111 Jefferson Boulevard Mixed-Use Project, including all actions related or referring to the proposed 5-story mixed-use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

17-2

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).

17-3

Sincerely,



Richard Drury

Jacqueline De La Rocha

From: Komalpreet Toor <komal@lozeaudrury.com>
Sent: Monday, June 21, 2021 11:05 AM
To: Allen, Michael
Cc: Richard Drury; Stacey Osborne
Subject: Comments on 11111 Jefferson Boulevard Mixed-Use Project DEIR
Attachments: 2021.06.21 DEIR Comment on 11111 Jefferson Blvd Project.pdf

Good morning Mr. Allen,

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.

18-1

Thank you.
Komal

--
Komalpreet Toor (she/her)
Paralegal
Lozeau | Drury LLP
[1939 Harrison Street, Suite 150](#)
[Oakland, CA 94612](#)

[\(510\) 836-4200](#)
[\(510\) 836-4205](#) (fax)
Komal@lozeaudrury.com



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

June 21, 2021

Michael Allen
City of Culver City
Planning Division
9770 Culver Boulevard
Culver City, CA 90232
michael.allen@culvercity.org

Re: Comment on 11111 Jefferson Boulevard Mixed-Use Project Draft
Environmental Impact Report (SCH No. 2020090329)

Dear Mr. Allen:

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).

18-2

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Drury", is written over a light blue horizontal line.

Richard Drury

Jacqueline De La Rocha

From: Wandy at Heritage Park <heritagepark.wandy@gmail.com>
Sent: Monday, June 21, 2021 12:18 AM
To: Allen, Michael
Subject: 11111 Jefferson Draft EIR Comment - Guest Parking Count violates Culver City Building Code?

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.

19-1

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

Thank you.
 Wandy Sae-Tan
 Heritage Park Resident

**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	
<i>Residential Component</i>	
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)
<i>Commercial Component</i>	
Market	38,600 sf
Restaurant (High Turnover Sit-Down)	3,300 sf
Restaurant (Fast Casual)	4,900 sf

19-2



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...

19-2

Table 3-3A

<i>Land Use Type: Residential</i>	<i>Vehicle Spaces Required</i>
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.

Jacqueline De La Rocha

From: Wandy at Heritage Park <heritagepark.wandy@gmail.com>
Sent: Monday, June 21, 2021 12:48 AM
To: Allen, Michael
Subject: 11111 Jefferson Draft EIR Comment - Heritage Park is at risk of Office Employees Looking for Parking

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

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.

Thank you.
Wandy Sae-Tan
Heritage Park Resident

20-1

20-2

Jacqueline De La Rocha

From: Wandy at Heritage Park <heritagepark.wandy@gmail.com>
Sent: Monday, June 21, 2021 1:44 AM
To: Allen, Michael
Subject: 11111 Jefferson Draft EIR Comment - Street, Sidewalk, and Bus Stop Trash

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 workload to:

- a. clean the street, sidewalk, and bus stops on the 11111 Jefferson triangle?
- b. clean the street, sidewalk, and bus stops north of the project on Jefferson (Jefferson / Dobson)?
- c. clean the street, sidewalk, and bus stops north of the project on Sepulveda (across from Studio Village)?

21-1

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

Wandy Sae-Tan
Heritage Park Resident

Jacqueline De La Rocha

From: Wandy at Heritage Park <heritagepark.wandy@gmail.com>
Sent: Monday, June 21, 2021 1:48 AM
To: Allen, Michael
Subject: Fwd: 11111 Jefferson Draft EIR Comment - Heritage Park is at risk of Cut-Through Traffic

FYI on my email to Michael Allen.

----- Forwarded message -----

From: **Wandy at Heritage Park** <heritagepark.wandy@gmail.com>
Date: Mon, Jun 21, 2021 at 1:35 AM
Subject: 11111 Jefferson Draft EIR Comment - Heritage Park is at risk of Cut-Through Traffic
To: Allen, Michael <Michael.Allen@culvercity.org>

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.

Thank you.
Wandy Sae-Tan
Heritage Park Resident

22-1