

General Plan 2045 and Zoning Code Update Project

Final Environmental Impact Report

State Clearinghouse No. 2022030144



July 2024



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PREPARED FOR:

City of Culver City

9770 Culver Boulevard

Culver City, CA 90232

PREPARED BY:

Environmental Science Associates

633 West 5th Street

Suite 830

Los Angeles, CA 90071

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Final Environmental Impact Report

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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 Program Environmental Impact Report (Final PEIR) for the proposed update to the General Plan, Picture Culver City: General Plan 2045 (General Plan 2045 or General Plan Update) and the associated Zoning Code Update that is necessary to implement the General Plan 2045. The General Plan 2045 and the Zoning Code Update are collectively referred to as the Project. (Project). This document, in conjunction with the Draft Program Environmental Impact Report (Draft PEIR), comprise the Final PEIR.

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 PEIR, the Project is the adoption and implementation of a comprehensive update to the Culver City General Plan and amendments to the Zoning Code to implement the General Plan 2045. The General Plan 2045 would provide a framework and vision to guide growth and development within the Planning Area, which includes the City's jurisdictional boundaries and its Sphere of Influence (SOI), through the planning horizon year of 2045. Together with the Zoning Code Update, the General Plan 2045 would serve as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council.

By law, a general plan must be an integrated, internally consistent statement of City policies. Government Code Section 65302 requires that a general plan include the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Senate Bill (SB) 1000 and Government Code Section 65302 require that since disadvantaged communities have been identified within the City, the Plan must also address Environmental Justice either as a standalone element or integrating related goals, policies, and objectives

throughout other elements. The General Plan 2045 includes a Community Health and Environmental Justice Element. Additional elements may be included as well, at the discretion of the City. The General Plan 2045 includes the following elements: Land Use and Community Design; Mobility; Conservation; Noise; Safety; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction, Infrastructure, Community Health and Environmental Justice; Economic Development; Arts, Culture, and Creative Economy; and Governance and Leadership. (The 2021-2029 Housing Element was adopted in August 2022.)

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

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 34-day review period commencing March 1, 2022, and ending April 4, 2022. The purpose of the NOP was to formally notice that the City was preparing a Draft PEIR for the General Plan 2045, to present the environmental topics preliminarily identified by the City for evaluation in the Draft PEIR, and to solicit input regarding the scope and content of the information to be included in the Draft PEIR.

In order to maintain compliance with the recently adopted Housing Element and to comply with state law, the City expanded the scope of the project to include the Zoning Code Update, which implements the proposed General Plan 2045, including the Housing Element. As a result, the City issued a Recirculated NOP for a 33-day period commencing on February 15, 2024 and ending on March 18, 2024.

The NOP and Recirculated NOP (NOPs) included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft PEIR. The City posted the NOPs on the City Planning website along with information regarding the process for providing comments. The NOPs, Initial Study, and comments received during the scoping processes of the Draft PEIR are contained in the Draft PEIR Appendix A.

The City conducted a virtual public scoping meeting on March 24, 2022 at 6:00 p.m. using Zoom. As a result of the Recirculated NOP, a second virtual public scoping meeting was held on March 7, 2024 at 6:00 p.m. using Zoom. The public scoping meetings provided interested individuals, groups and public agencies the opportunity to provide oral comments to the lead

agency regarding the scope and focus of the Draft PEIR as described in the NOPs. The meetings included a presentation by the City and their environmental consultant that included an overview of the Project, information regarding the CEQA process and opportunities for public input, issues identified for analysis in the Draft PEIR, and solicitation of oral and written comments on environmental issues and alternatives the public would like to see evaluated in the Draft PEIR.

During the two public review periods, 16 comment letter were submitted, eight during the 2022 NOP scoping period and eight during the 2024 Recirculated NOP scoping period).

Correspondence was received from the California Department of Fish and Wildlife (CDFW), California Department of Transportation (Caltrans), Los Angeles County Sanitation Districts, Los Angeles County Metropolitan Transportation Authority (LA Metro), Southern California Association of Governments (SCAG), South Coast Air Quality Management District (SCAQMD), Department of Toxic Substances Control (DTSC), the Native American Heritage Commission (NAHC), City of Los Angeles Wastewater Engineering Services Division, interested organizations, and interested parties. All written comments are provided in Appendix A of the Draft PEIR.

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 PEIR which indicated that the Draft PEIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft PEIR to the Culver City Julian Dixon Library; (4) posted the NOA and the Draft PEIR on the City's Planning Division website at: <https://www.pictureculvercity.com/environmental-review>; (5) posted a condensed version of the NOA in the Culver City News; (6) sent an email with the NOA to the last known 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 March 28, 2024, and ended on May 13, 2024, for a total of 46 days.

During the Draft PEIR public review period, the City Planning Division received sixteen (16) comment letters on the Draft PEIR from agencies, organizations, and individuals through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters, of this Final PEIR. All written comments received during the public review period of the Draft PEIR are presented, and responses are provided in Chapter 2, *Comments and Responses*, of this Final PEIR.

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 Project, summarizes the Draft PEIR public review process, and presents the contents of this Final PEIR.

Chapter 2, Comments and Responses. This chapter presents all comments received by the City during the public review period of the Draft EIR as well as the responses to those comments.

Chapter 3, Revisions, Clarifications and Corrections to the Draft PEIR. This chapter includes revisions to the Draft PEIR that represent minor changes or additions in response to some of the comments received on the Draft PEIR, and additional edits to provide a correction to the Draft PEIR text. Changes to the Draft PEIR are shown with ~~striketrough~~ 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 PEIR.

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 mitigation measures.

Appendix A: Original Comment Letters on the Draft PEIR. Appendix A contains the comment letters on the Draft PEIR that were received by the City.

CHAPTER 2

Comments and Responses

This chapter of the PEIR provides responses to written comments received on the Draft PEIR. 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.”

Table 2-1, *List of Commenters*, provides a list of the comment letters received. Each comment letter received on the Draft PEIR is assigned a number, as indicated in Table 2-1. The body of each comment letter has been separated into individual comments, which are numbered. Each comment that requires a response within the letters is also assigned a number. This results in a numbering system whereby the first comment in the first letter is identified as Comment 1-1, 1-2, and so on. The letter is included in its entirety with the bracketing for the individual comments, followed by the corresponding responses. The letters are provided in Appendix A, Original Comment Letters, of this Final PEIR.

**TABLE 2-1
LIST OF COMMENTERS**

Letter No.	Name
1	South Coast Air Quality Management District (SCAQMD) 21865 Copley Drive Diamond Bar, CA 91765
2	Gabrieleno Tribe of Mission Indians – Kizh Nation PO Box 393 Covina, CA 1723
3	Los Angeles County Metropolitan Transportation Authority (LA Metro) One Gateway Plaza Los Angeles, CA 90012
4	Jon Bridgeman
5	Anna Budevaska
6	Yihui Gould
7	Gloria Moritz
8	Melissa Korc
9	Yumi Mandt-Rauch
10	Karyn Marks
11	Gil Ramirez

Letter No.	Name
12	Pouran Saeedi
13	Judi Sherman
13A	Judi Sherman
14	Sequoia Tully
15	Louise Wechsler
16	Jeff Willis

Where responses result in a change to the Draft PEIR, it is noted and the resulting change is identified in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final PEIR. As required by 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 Responses to Individual Comments

Responses to individual comments are included on the following pages.

Letter 1

South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Dated May 2, 2024

Comment 1-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Culver City is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft PEIR

Based on the Draft PEIR, the Proposed Project would replace the existing General Plan in its entirety to establish a long-term vision.¹ The land use designations in the Proposed Project are residential, mixed-use, and special purpose.² The residential designation ranges from single-family homes to multi-family housing; mixed-use designations provide areas for a range of residential and commercial uses; and the special purpose designations are for a range of institutional uses and public facilities.³ The Proposed Project would result in an estimated 12,700 new housing units⁴ and a net increase of 3.7 million square feet of non-residential development by 2045.⁵

¹ Draft PEIR. Page 2-8.

² *Ibid.* Page 2-13.

³ *Ibid.*

⁴ *Ibid.* Page 2-19.

⁵ *Ibid.* Page 2-20.

Response to Comment 1-1

This comment is introductory in nature and provides a summary of the Project. Responses to the specific comments raised are provided below in Responses to Comments 1-2 through 1-5.

Comment 1-2

South Coast AQMD Staff's Comments on the Draft PEIR

Emission Reductions from Health Risk Strategies

When certifying an EIR for a project, retain the authority to include any additional information deemed relevant to assessing and mitigating the environmental impacts. South Coast AQMD is concerned about the potential public health impacts of sitting [sic] sensitive populations within the proximity of existing air pollution sources (e.g., freeways and railroads). For this reason, prior to approving future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in a new project and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the

guidance provided in 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective,⁶ which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions; and 2) CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.⁷

⁶ California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

⁷ CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

Response to Comment 1-2

This comment requests that the City of Culver City apply the guidance provided in CARB's Air Quality Land Use and Handbook: A Community Health Perspective¹ and CARB's technical advisory.² Draft PEIR Section 4.2, Air Quality, provides discussion of CARB's Air Quality and Land Use Handbook and the Technical Advisory supplement on page 4.2-17. As discussed in the Draft PEIR, the Community Health Perspective and Technical Advisory serve as general guidance for considering impacts to sensitive receptors from facilities that emit TACs and infill development that may place them next to high volume roadways, which may occur as a result of future development under the General Plan and Zoning Code Update. Since these documents are guidance documents and do not constitute a requirement or mandate, the General Plan Update includes specific policies that reflect the guidance in these documents. The applicable General Plan policies that address the guidance in CARB's handbook are CHEJ-2.7, Sensitive land uses, page 4.2-37 of the Draft PEIR, and C-4.4, Siting of uses near IOF, page 4.2-38. The applicable General Plan policy that addresses CARB's Technical Advisory is C-4.3, Siting uses near freeways, on page 4.2-38 of the Draft PEIR. As demonstrated in the Draft PEIR, Section 4.2, Air Quality, the City of Culver City will utilize CARB's Air Quality Land Use and Handbook and Technical Advisory to reduce potential health impacts from siting potential sensitive populations within the proximity of existing air pollution sources (e.g., freeways and railroads) and will incorporate strategies to reduce air pollution exposure near high-volume roadways.

Comment 1-3

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are able to screen out greater than or equal to 50% of DPM,⁸ but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,^{9,10} a cost burden is expected to

¹ California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf.

² CARB, Technical Advisory Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.

be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft PEIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in Draft PEIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

⁸ U.S. EPA, "What is a MERV rating?" Available at: <https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating>

⁹ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>

¹⁰ International Journal of Indoor Environment and Health, Pilot Study of High-Performance Air Filtration for Classroom Applications, November 2012. Available at: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>

Response to Comment 1-3

This comment discusses the use of HVAC equipped with MERV 13 to 15 filters in new development to reduce the exposure of residential receptors to particulate matter. The comment suggests that the environmental analysis include the increased energy use from incorporation of the MERV filters as well as emissions associated with trucks delivering new filters and trucks transporting used filters to disposal sites. The comment states that the effectiveness of a particular HVAC filter should be evaluated in more detail based on supporting evidence before assuming the filter will sufficiently alleviate exposure to DPM emissions.

As indicated in Chapter 1, Introduction, the Draft PEIR is a program-level document and as such does not evaluate the project-specific impacts of individual developments that would occur in the future under the Project. Therefore, an analysis of specific HVAC and MERV filters and associated impacts was not conducted. However, as discussed in Section 4.2, Air Quality (page 4.2-37), General Plan policy CHEJ-2.7, Sensitive land uses, limits siting new sensitive land uses, such as schools, daycare centers, and playgrounds within 500 feet of freeways and the IOF. For sensitive land uses that cannot be sited at least 500 feet away, design mitigations are required, which include but are not limited to:

- Locate air intake systems for HVAC systems as far away from existing air pollution sources as possible.
- Use HEPA filters in the heating, ventilation, and air conditioning systems and develop a maintenance plan to ensure the filtering system is properly maintained.

- For nonresidential buildings, consider using only fixed windows next to any existing sources of pollution.
- Plant landscape barriers between highways and residential areas to reduce noise and air pollution for residents.

Specific projects developed under the General Plan and Zoning Code Update would follow the siting guidelines of General Plan policy CHEJ-2.7, and if required, an HVAC and MERV analysis would be conducted. Therefore, discussion of the HVAC and MERV analysis is not appropriate in this PEIR as there is not a specific development project being evaluated. The appropriate analysis will be conducted, if necessary, in subsequent environmental documents for specific projects.

Comment 1-4

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

Response to Comment 1-4

The comment states that permits from the SCAQMD would be required if new stationary or portable sources are required, and that the SCAQMD would become a Responsible Agency under CEQA instead of a Commenting Agency. As indicated in Response to Comment 1-3, the Draft PEIR is a program-level document and as such does not evaluate project-specific impacts of individual developments since no development is proposed at this time. Therefore, the details regarding the use of stationary or portable sources that would occur with future development under the General Plan and Zoning Code Update are unknown. As necessary, subsequent environmental documents for specific projects will include an analysis of stationary and portable sources. In addition, Chapter 1 indicates that the SCAQMD would be a Responsible Agency for future development projects under the General Plan 2045 and Zoning Code Update. Therefore, while analysis of stationary and portable sources is not appropriate in this PEIR, future development would be required to comply with CEQA and obtain applicable permits.

Comment 1-5

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

Response to Comment 1-5

This comment states that the Final EIR should include calculations and analyses for construction and operation emissions of new stationary and portable sources. However, as discussed above in Response to Comment 1-4, the Draft PEIR is a program level document and there are no specific projects proposed at this time. Therefore, the specifics of development, including the use of stationary or portable sources, are unknown. Environmental documents prepared for future development projects will provide an analysis, as needed, including calculation of construction and operational emissions of stationary and portable sources that would require a permit from the SCAQMD.

Comment 1-6

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Response to Comment 1-6

In accordance with California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the City, as lead agency, has addressed environmental issues raised in this letter as well as other letters received. The issues raised by the SCAQMD are addressed in detail and in good faith. In addition, the City will provide written responses to all public agencies, including the SCAQMD, at least 10 days prior to certification of the PEIR.

Letter 2

Gabrieleño Tribe of Mission Indians – Kizh Nation
PO Box 393
Covina, CA 91723
Dated March 22, 2024

Comment 2-1

Thank you for your letter dated March 28, 2024. Regarding the project above. This is to concur that we agree with the Specific Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

Response to Comment 2-1

The City assumes the comment is referring to the NOA for the Draft PEIR for the General Plan 2045 and Zoning Code Update, which was circulated on March 28, and not a proposed Specific Plan Amendment as stated in the comment. As indicated in Draft PEIR Section 4.17, Tribal Cultural Resources, the City sent notification and request to consult letters to seven individuals and organizations pursuant to AB 52 and SB 18. On March 4, 2022, February 28, 2024, and March 6, 2024, the City received responses from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The Kizh Nation indicated they are in agreement with the General Plan 2045. As part of the consultation and as indicated in the comment, the Tribal government would like to request consultation for all future projects in the City, but it is the City's assumption that this would apply only in instances where there would be the potential for ground disturbance.

As indicated in Section 4.17, future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. General Plan Policy C-1.16 also reinforces the continuation of consultation with Native American groups per the requirements of SB 18 and AB 52. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction in support of the City's goals for protection of cultural resources. As indicated in the Draft PEIR, with adherence to the regulations and consistency with the proposed General Plan policies and implementation actions, impacts with respect to tribal cultural resources would be less than significant.

Letter 3

Los Angeles County Metropolitan Transportation Authority (LA Metro)
One Gateway Plaza
Los Angeles, CA 90012
Dated May 10, 2024

Comment 3-1

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

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

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

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

Project Description

The Project includes an update to the General Plan to respond to the changing needs and conditions of the conditions of the City and region to reflect new state laws. The General Plan will consist of 14 Elements. In addition to Elements required by the state, the General Plan Update (GPU) will also include Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.

Response to Comment 3-1

This comment provides an introduction to LA Metro and a description of the Project. Responses to the specific comments raised are provided below in Responses to Comments 3-2 through 3-11.

Comment 3-2

Recommendations for EIR Scope and Content

Transit Services and Facilities

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

Response to Comment 3-2

The comment states that the EIR should include updated information on existing and planned transit services and facilities within the Plan area, utilizing Metro’s transportation plans. Draft PEIR Section 4.16, Transportation, provides a description of the existing and planned transit within the Transportation section, under “Transit Conditions.” Specifically, the section details existing transit centers, fixed-route transit services, bus, and shuttle services.

The City is aware of NextGen network recommendations and expressed interest in partnering with LA Metro to increase the number of high frequency routes operating on proposed MOVE Culver transit priority corridors (particularly Sepulveda). A description of NextGen Bus Plan has been added to PEIR Subsection 4.16.3.

The General Plan designates Transit Priority Corridors that reallocate public right-of-way to support high-frequency transit service and other alternative modes. Improvements along these roadways may include installing transit priority lanes or other transit speed and reliability treatments. These corridors include Washington Boulevard, Sepulveda Boulevard, and Jefferson Boulevard. The Plan also calls for the City to explore candidate corridors that already serve local and regional high-frequency transit service recommended in subsidiary plans and studies including regional transit plans (like Next Gen), and the Transit Oriented Development Visioning Plan.

Impact Statement TR-1 in Draft PEIR Section 4.16 addresses any conflicts with adopted circulation programs, plans, ordinances, or policies. More specifically, Mobility Element Policy M-3.4 would prioritize transit capital investments and improvements that align with local plans as well as regional studies, and LA Metro’s Long Range Transportation Plan (LRTP). In addition, Mobility Element Policies M-3.4 (High-quality transit service), M-4.5 (Equitable transit access), and M-6.2 (Coordination with other jurisdictions to improve arterials, including neighboring jurisdictions, LA Metro, Southern California Association of Governments, and Caltrans) support

coordinating connections to Metro regional bus and rail services. The Threshold TR-1 discussion has been revised to address NextGen Bus Plan. Please see Chapter 3, *Revisions, Clarifications, and Corrections to the Draft PEIR*, of this Final PEIR for the revisions regarding NextGen Bus Plan. These clarifications added to Section 4.16 do not affect the conclusions in the PEIR.

Comment 3-3

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

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

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

Response to Comment 3-3

Draft PEIR Section 4.16, Transportation, provides information regarding transit facilities, including buses lines, rail lines, and the E Line (pages 4.16-6 through 4.16-10). Culver City acknowledges connectivity to Metro Rail stations and Transit Centers as a high priority for the Culver CityBus network as well as other modes of transportation. In addition, as discussed in the Draft PEIR, in 2017 the City completed the Transit-Oriented Development Visioning Study and Recommendations, which aims to provide more and better choices for circulation by increasing the viability of alternative mobility mode choices to allow people to drive less and walk, bike, and take transit more. Please see Response to Comment 3-4 below for a discussion regarding connectivity.

Draft PEIR Section 4.16 includes a consistency analysis with adopted circulation programs, plans, ordinances, or policies. The analysis included a review of the Culver City Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and the Local Road Safety, which encourage use of active transportation and connections to Metro facilities. Policy M-3.1 addresses regional mobility coordination and prescribes that the City continue to coordinate with Metro and other municipal mobility service providers. In addition, Policy M-3.4 directs the City to prioritize capital investments and improvements to achieve high-quality transit service that aligns with the City's Short Range Mobility Plan, regional studies, and LA Metro's Long Range Transportation Plan. The Draft PEIR concludes that the Project would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and the impact would be less than significant.

The General Plan's Governance and Leadership Element addresses regional partnerships with outside agencies, including LA Metro, that the City has formed and will continue to strengthen. Culver City actively participates in and maintains its regional partnerships. The City will continue to coordinate with LA Metro regarding the regional transportation system and will ensure coordination with Metro when development applications are submitted that are within proximity of Metro infrastructure.

Comment 3-4

Transit Supportive Planning: Recommendations and Resources

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

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of the Culver City Station within the Plan area and include strategies in proposed developments to orient pedestrian pathways towards the Station.

Response to Comment 3-4

The City acknowledges the benefits of locating commercial and residential properties near transit stations. The comment encourages Culver City to include strategies in proposed developments to orient pedestrian pathways towards Culver City Station. As discussed in Draft PEIR Section 4.10, Land use and Planning, the land use patterns associated with the General Plan 2045 help establish a clear multimodal network throughout the City by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in areas with mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities. The Project identifies planned pedestrian, multimodal, and transit improvements for the City, which would improve mobility between neighborhoods and allow residents to travel throughout the city. The General Plan 2045 includes policies to allow higher residential density and intensity in mixed use developments to support walkability and transit use (Policy LU 1.1); and incentivize jobs and housing growth around high-quality transit stops and along transit corridors (Policy LU 1.3).

With regard to connectivity, policies in the General Plan 2045 aim to connect transit-oriented communities through strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities (Policy LU 1.4). Further, the General Plan 2045 would ensure that new project applications foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage (Policy LU 9.5). The General Plan 2045 also includes policies to create walkable connections in multifamily development (Policy LU 2.6); encourage more variety of public- and neighborhood-serving uses and affordable housing (Policy LU 8.1); and create community

gathering spaces in mixed use districts to provide publicly accessible, centrally located private open space (Policy LU 8.2).

The Mobility Element also contains policies that address the benefits of locating commercial and residential properties near transit stations and connectivity. Draft PEIR Section 4.16, Transportation, includes a discussion of existing and proposed pedestrian facilities as well as the Culver City Bicycle and Pedestrian Action Plan, which establishes a long-term vision for improving walking in Culver City. In addition, the Draft PEIR provides a discussion of the Transit-Oriented Development (TOD) Visioning Study and Recommendations, which was adopted in 2017 to foster multimodal connectivity and provide pedestrian connections at the Metro E Line Culver City Station. As discussed in Draft PEIR Section 4.16, the General Plan 2045 contains Goal M-5, which calls for a sustainable and accessible transportation system and transit-oriented communities. The City's goal, as expressed in M-5, is to establish and promote a sustainable and accessible transportation system that provides great multimodal travel experiences for residents, workers, and visitors through mobility planning, transportation demand management, and transit-oriented districts, corridors, and developments. This goal is supported by policies, including Policy M-5.1 to continue to implement the 2017 TOD Visioning Study and Recommendations. With regard to connectivity, the General Plan 2045 includes policies that would improve connections to local and regional transit services (Policy M-2.3) and encourage the use of alternative modes of transportation (Policy M-5.2), including walking and biking through supportive land use development.

The comment does not raise any issues with respect to the content or adequacy of the Draft EIR, and thus no further response is necessary.

Comment 3-5

2. Transit Connections and Access: Given the Plan area's proximity to Culver City Station, the Plan should include policies and/or design standards to accommodate transfer activity between bus and rail customers that will occur along the sidewalks and public spaces. Metro completed the Metro Transfers Design Guide, a best practice document on transit improvements. This can be accessed online at <https://www.metro.net/about/station-design-projects/>

Response to Comment 3-5

The City concurs with the comment. Metro's Culver City Station provides transfers at street level on Metro Routes 33 and 617 to E Line light rail service. In addition, the station is designed to accommodate transfer activity to Culver CityBus, LADOT Commuter Express, and Santa Monica Big Blue Bus service.

The Mobility Element provides policies to prioritize transit transfers for future stop designs and station area enhancements. For example, Policy M- 2.5 would transform traditional bus stops into mobility-centric locations that facilitate connectivity between modes of transportation, and Policy M-3.1 would improve and influence regional mobility service quality through coordination with Metro and other municipal mobility service providers. Further, Policy M-3.4 aims to

prioritize capital investments and improvements to enhance transit reliability and rider experience to make transit competitive with driving, Policy M-4.2 would prioritize investments to reduce first/last mile transit barriers, and Policy M-4.6 would construct accessible and compliant pedestrian facilities.

The comment does not raise any issues with respect to the content or adequacy of the Draft EIR, and therefore, no further response is necessary.

Comment 3-6

4. [sic] Walkability: Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhances crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the Culver City Station. The City should consider requiring the installation of such amenities as part of the conditions of approval of projects within the Plan area.

Response to Comment 3-6

Draft PEIR Section 4.16, Transportation, addresses consistency of the Project with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities under Impact Statement TR-1. As discussed in Section 4.16, in the past, transportation analysis focused on the level of service metric, which measured congestion at local intersections and roadway segments, with an emphasis on ensuring that the street grid network functioned well and allowed for the efficient movement of vehicles. The current focus is to encourage active transportation (e.g., walking, biking, etc.) and transit, and to limit increases in vehicle miles traveled. This analysis was also conducted with review of the Culver City Short Range Mobility Plan, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and the Local Road Safety Plan. Implementation of the General Plan 2045 would improve connections to local and regional transit services (Policy M-2.3) and encourage the use of alternative modes of transportation (Policy M-5.2), including walking and biking through supportive land use development. The General Plan 2045 would enhance pedestrian infrastructure by providing improvements to existing pedestrian facilities, constructing planned pedestrian facilities, and prioritizing pedestrian safety. More specifically, Policy M-1.3 would improve transportation network safety as improvements would be designed with the most vulnerable users in mind to ensure accessibility to all travelers regardless of age, race, gender, or ability. In addition, Policy M-4.6 would construct pedestrian facilities, including sidewalks and controlled crossings, that are ADA-compliant and connect with key land uses and regional and local transit services. The General Plan 2045 also includes an implementation action (IA.M-4) which directs the City to complete and adopt complete streets guidelines in coordination with City Departments and stakeholders.

Comment 3-7

5. Access: The Plan should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the

First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:
http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

Response to Comment 3-7

This comment addresses inclusion of first-last mile connections to transit which encourage development that is transit-accessible. The Mobility Element provides several policies to prioritize first/last-mile connectivity and access to transit stops. These include policies which would provide multimodal connectivity through transformation of traditional bus stops (Policy M-2.5) and align with the Bicycle and Pedestrian Action Plan to facilitate and interconnected citywide bicycle network (Policy M-8.5). In particular, Policy M-4.2 would prioritize investments that reduce first/last-mile barriers to transit stops and encourage alternative transportation, and Policy M-4.7 would prioritize the expansion of alternative mobility services and resources to communities with limited access to transit. Further, the proposed General Plan 2045 mobility network identifies segments of National Boulevard, Robertson Boulevard, and Washington Boulevard around the Culver City E Line station which could become special designated Active Transportation Corridors.

The comment does not raise any issues with respect to the content or adequacy of the Draft EIR, and thus no further response is necessary.

Comment 3-8

6. Active Transportation: Metro encourages the City to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or a secured bike room, for guests, employees, and residents. Bicycle parking facilities should be designed with best practices in mind, including: high visibility siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. Additionally, the Plan should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transfer users to/from the destinations within the Plan area.

Response to Comment 3-8

The comment encourages the City to promote bicycle parking and facilities as well as the provision of safe and convenient connections for people walking, biking, and rolling. As discussed in Draft PEIR Section 4.16, the City's Municipal Code (CCMC) Section 7.05.015, Transportation Demand and Trip Reduction Measures, includes bicycle parking and pedestrian pathway. In addition, the City requires short-term and long-term bicycling parking for multi-family residential and non-residential developments (Municipal Code Section 17.320.045).

As discussed in Section 4.16, in June 2020 the City adopted the Bicycle and Pedestrian Action Plan, which establishes a long-term vision for improving walking and bicycling in Culver City. (The 2020 Plan updates the previous Bicycle and Pedestrian Master Plan adopted by the City Council in 2010.) The 2020 Plan, like the previous plan, seeks to ensure comfortable, safe, and attractive places to hike and walk so that these forms of active transportation become first

choices for travelling around the City. The plan’s vision is that “Culver City will be a community where bicycling and walking provide affordable, safe, and healthy mobility options for all residents. New projects and programs will work to enhance multi-modal mobility.” Goals include access and connectivity, healthier and safer communities, affordability, collaboration, and equitability.

The Mobility Element prioritizes active transportation. The Mobility Element supports and complements the measures, objectives, and policies in the City’s Bicycle and Pedestrian Action Plan (Policies M-2.1, M-2.2, M-4.4, M-8.5). In addition, Policies M-2.1, M-4.4, and M-7.4 seek to identify gaps in the existing bicycle network and prioritize multimodal projects, provide additional bicycle parking, and implement bicycle detection at crossing signals.

With regard to connectivity, as discussed in Response to Comment 3-4, the General Plan 2045 would ensure that new project applications foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage (Policy LU 9.5). In addition, policies in the General Plan 2045 aim to connect transit-oriented communities through strong pedestrian, Culver CityBus, other public transit, and bicycle connections to and from transit stops via pedestrian-oriented building design, safe and convenient road crossings, and street furniture and amenities (Policy LU 1.4).

Comment 3-9

7. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design.

Response to Comment 3-9

The comment identifies the importance of wayfinding signage to help people navigate all modes of transportation. The City understands the need for signage. Mobility Element Policy M-8.3 addresses the need for human-scale lighting along pedestrian thoroughfares, trails and at transit stops. If the City develops signage with contract referencing Metro services or using Metro brand or graphics, the City would coordinate with Metro to obtain the necessary approval.

The comment does not raise any issues with respect to the content or adequacy of the Draft EIR, and thus no further response is necessary.

Comment 3-10

8. Multi-modal Connections: With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Plan area and nearby transit services, including pedestrian connections and bike lands/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.

Response to Comment 3-10

This comment encourages an analysis of impacts on non-motorized transportation modes as a result of the anticipated increase in traffic from Project implementation. The comment urges that such analysis should consider improved non-motorized access to the Plan area and nearby transit services. The Mobility Element provides policies to proactively improve person-throughput on arterials and collectors. These policies would prioritize new street designs and transportation modes with higher people-moving capacity such as transit lanes, protected bikeways, and sidewalks (Policy M-6.1), coordinate with other neighboring jurisdictions to improve arterial person-throughput (Policy M-6.2), and evaluate multimodal project performance based on Key Performance Indicators (Policy M-8.6). Additionally, Policy M-3.3 would aim to improve existing mobility services including CityBus and CityRide, Policy M-5.2 would shift the mobility paradigm toward sustainable modes, and Policies M-5.3 and M-5.4 would deploy transportation demand management measures, among others.

Additionally, the Project includes Implementation Action recommendations in support of increasing active transportation trip production. These include IA.M-8 and IA.M-9, which would establish a comprehensive Transportation Demand Management (TDM) Plan and TDM Ordinance update.

Draft PEIR Section 4.16, Transportation, includes a discussion of impacts to non-motorized transportation under Impact TR-1, which addresses any conflicts with programs, plans, ordinances, or policies addressing the circulation system. The analysis concluded that the Project supports the improvement and expansion of non-motorized transit within the Plan area. The analysis includes a discussion of the policies listed above.

Comment 3-11

9. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimal parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment 3-11

This comment encourages the incorporation of parking provision strategies to reduce automobile-orientation in design and travel demand. The Draft PEIR discusses Mobility Element policies such as Policy M-5.7, which would deploy parking management strategies to manage parking, improve transit-oriented districts, and support the mobility paradigm shift away from single-occupancy vehicles. Further, the Draft PEIR discusses adherence to the Culver City Municipal Code, which states that no minimum parking is required for any use except as may be determined through a Comprehensive Plan. These regulatory guidelines would ensure that future development under the Plan would incorporate transit- and pedestrian-oriented parking provision strategies.

Comment 3-12

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

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

Response to Comment 3-12

This comment provides a general conclusion as well as additional information regarding LA Metro. In accordance with Public Resources Code Section 21092.5(a), the City will provide written proposed responses to comments from public agencies, including LA Metro, at least 10 days prior to certification of the Final PEIR.

Letter 4

Jon Bridgeman

Received May 13, 2024

Comment 4-1

I am an environmental consultant who lives in Fox Hills and works across Los Angeles. I understand housing is an issue for all Culver City residents and with that in mind, I want to stress these responses to the General Plan EIR.

Here are my concerns:

Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need to account for the density bonus (doubles the allowed density)

Response to Comment 4-1

The comment is introductory and expresses an opinion regarding the proposed density in Fox Hills. The comment will be forwarded to the decision makers for consideration. The comment does not raise an issue on the content of the Draft EIR. Therefore, no further response is warranted.

Comment 4-2

Fox Hills' current buildings are older and either have no capability of adding AC systems or are cost-prohibitive. The current cooling system for Fox Hills relies on natural ocean breeze. In my unit, our windows and sliding doors are open over 12 hours a day, sometimes 24 hours a day to make use of the ocean breeze. It is the most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. There needs to be a study to assess the effect these new developments will have on the ocean breeze by a climate/weather expert. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

Response to Comment 4-2

The comment raises concerns regarding the potential effects resulting from the increase in density and building height in Fox Hills that would occur as a result of the Project relative to ocean breezes and requests a study be undertaken. As indicated in Draft PEIR Section 4.1, Aesthetics, the City received comments during the scoping process regarding ocean breezes. The comments were specific to the Fox Hills neighborhood and concern that the increase in density and building height could affect ocean breezes. A study and more detailed analysis was

not provided in the Draft PEIR since the CEQA Guidelines do not provide a threshold pertinent to ocean breezes.

For informational purposes, a review of wind rose maps from the National Oceanic and Atmospheric Administration (NOAA) for the Santa Monica Airport and Los Angeles International Airport show that wind patterns during the warmer summer months (July to September) primarily hail from a southwesterly direction in the coastal region of Los Angeles, but it is also acknowledged that a minor percentage of the wind comes directly from the west. Some of the roads in Fox Hills run generally in a southwesterly to northeasterly direction, which would allow the majority of the winds out of the southwest to pass through the area without significant obstruction. As indicated in the Draft PEIR, the City anticipates that given the topography as well as the setbacks and building articulation required in the Zoning Code Update standards, breezes would not be notably obstructed. Regardless, as this is not considered an impact under CEQA, no further response is necessary on this topic.

Comment 4-3

The EIR shows “Unavoidable Significant Impact” (air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.

Response to Comment 4-3

As indicated in Draft PEIR Executive Summary, Section ES.4, the Project would result in significant unavoidable impacts with regard to air quality, cultural resources (historic), noise, and transportation. As discussed in Draft PEIR Chapter 2, Project Description, the Project analyses contained in the PEIR are based on assumptions pertaining to future growth through the horizon year 2045. The growth projections are based on an understanding of historic, current, and projected demographic and economic conditions in the City through 2045, rather than full buildout. The full buildout scenario would assume that every parcel would be developed with the maximum amount allowed under the General Plan 2045. Actual development that may occur by the horizon year is typically less than the theoretical maximum of development. The growth projections are not done on a parcel-by-parcel basis but rather, the projections allocate a total amount of growth for the City overall and by TAZ zone. These projections are used for planning and analysis purposes.

Table 2-3 in Draft PEIR Chapter 2 provides the growth projections for population, housing, and jobs under the General Plan 2045. The General Plan 2045 is projected to result in a population of 62,400 persons in 2045 (an increase of 21,600 persons compared to the 2020 population); 28,310 households (an increase of 11,310 households compared to 2019 household count; and 84,300 jobs (an increase of 16,260 jobs compared to 2019 job count). The Draft PEIR evaluates this level of growth through the year 2045. In addition, it should be noted that the General Plan 2045 assumes residential growth to meet the next three Regional Housing Needs Assessment (RHNA) cycles that will occur during the timeframe of this General Plan.

With regard to the density bonuses, it is unknown whether a developer would choose to apply a density bonus to a particular project. While one developer may choose to do that, another developer may not develop a property to its maximum allowed density. Therefore, it is speculative to assume that density bonuses would be used in all projects throughout the City.

Comment 4-4

The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

Response to Comment 4-4

As discussed above, the growth projections are based on an understanding of historic, current, and projected demographic and economic conditions in the City through 2045. As acknowledged in Chapter 2, Project Description, in the discussion regarding residential land use designations (page 2-16), under limited circumstances, an increase in density above the maximum allowable density can occur, such as density bonuses for affordable housing, as well as other incentive-based local ordinances that implement the goals of the General Plan. As indicated above, it is unknown whether a developer would choose to apply a density bonus to a particular project. Since there is no specific project at this time it would be speculative to assume particular densities at the parcel level.

Comment 4-5

Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 3 to 6 times from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

Response to Comment 4-5

Under the adopted General Plan, the Fox Hills area of the City currently has various land use designations, with the area south of Slauson including Planned Residential Development, Regional Center, Cemetery and Open Space and the north of Slauson General Corridor, Low Density Multiple Family and Industrial Park. The adopted Land Use Element acknowledges that the Planned Residential Development designation average densities exceed the densities allowed in the current General Plan and are up to 72 du/ac in Fox Hills and up to 43.5 du/ac along Jefferson Boulevard.

Draft PEIR Figure 2-6 shows the proposed General Plan Land Use Map and Table 2-2 provides the proposed land use designations and general development parameters, such as maximum residential density and non-residential FAR. The residential and mixed use designations allow varying ranges of residential density. As shown in Figure 2-6, the Mixed Use High designation, which would allow 100 dwelling units per acre (du/ac), is located primarily in the Culver City Metro E Line station area and existing larger commercial and office centers. In Fox Hills, this

designation would occur primarily in areas that are designated Regional Center in the existing Land Use Map. Other areas within Fox Hills south of Slauson Avenue are designated as Medium Density Multifamily, which would allow a maximum of 50 du/ac, and High Density Multifamily, which would allow a maximum of 70 du/ac, as well as Open Space and Cemetery. The Fox Hills area north of Slauson would be designated Mixed Use Corridor 2 and Medium Density Multifamily, which would allow a maximum of 50 du/ac.

The Draft PEIR evaluates at a program level the projected growth that would likely occur based on an understanding of historic, current, and projected demographic and economic conditions in the City through 2045. Individual developments are not proposed at this time and whether or not a site would be developed to the maximum density or intensity allowed by the General Plan 2045 is unknown. The comment provides a list of environmental issues, including air quality, noise, traffic, street parking, ocean breeze, infrastructure and services. Please see Draft PEIR Section 4.2, Air Quality; 4.12, Noise; 4.16, Transportation; 4.18, Utilities and Service Systems; 4.14, Public Services; and 4.15, Recreation for analyses of these issues. As discussed in Response 4-2, ocean breezes is not an environmental issue in the CEQA Guidelines. As indicated in Section 4.16, the City's Municipal Code Section 17.320.020, Number of Parking Spaces Required, no minimum parking is required for any use except as may be determined through a Comprehensive Plan. In addition, parking is not an issue in the CEQA Guidelines.

Comment 4-6

Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

Response to Comment 4-6

The majority of Fox Hills residences are located south of Slauson although there are some existing residences north of Slauson. This comment relates to the General Plan 2045 and does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, no further response is necessary. However, the comment is forwarded to decision makers for their consideration.

Comment 4-7

Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

Response to Comment 4-7

As indicated in Draft PEIR Chapter 2, Project Description, the General Plan 2045 establishes the long-range vision that reflects the aspirations of the community and provides policies to support

that vision by guiding the physical growth of the City. The comment relates to the General Plan and does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, no further response is necessary. However, the comment is forwarded to decision makers for their consideration.

Comment 4-8

We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots to build on. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre. (their plan is 75-100 units affordable units of the 1105 they are planning)

Response to Comment 4-8

The comment expresses an opinion and relates to the General Plan 2045. The comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, no further response is necessary. However, the comment is forwarded to decision makers for their consideration.

Letter 5

Anna Budevaska

Received May 13, 2024

Comment 5-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)

Response to Comment 5-1

The comment expresses an opinion with regard to the density in Fox Hills and relates to the General Plan. The comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, no further response is necessary. However, the comment is forwarded to decision makers for their consideration.

Comment 5-2

2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

Response to Comment 5-2

The comment raises concerns regarding the potential effects resulting from the increase in density and building height in Fox Hills that would occur as a result of the Project relative to ocean breezes and requests a study be undertaken. As indicated in Draft PEIR Section 4.1, Aesthetics, the City received comments during the scoping process regarding ocean breezes. The comments were specific to the Fox Hills neighborhood and concern that the increase in density and building height could affect ocean breezes. A study and more detailed analysis was not provided in the Draft PEIR since the CEQA Guidelines do not provide a threshold pertinent to ocean breezes.

For informational purposes, a review of NOAA wind rose maps for the Santa Monica Airport and Los Angeles International Airport show that wind patterns during the warmer summer months (July to September) primarily hail from a southwesterly direction in the coastal region of Los

Angeles, but it is also acknowledged that a minor percentage of the wind comes directly from the west. Some of the roads in Fox Hills run generally in a southwesterly to northeasterly direction, which would allow the majority of the winds out of the southwest to pass through the area without significant obstruction. As indicated in the Draft PEIR, the City anticipates that given the topography as well as the setbacks and building articulation required in the Zoning Code Update standards, breezes would not be notably obstructed. Regardless, as this is not considered an impact under CEQA, no further response is necessary on this topic.

Comment 5-3

3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.

Response to Comment 5-3

As indicated in Response 4-3, the Project would result in significant unavoidable impacts with regard to air quality, cultural resources (historic), noise, and transportation. As discussed in Draft PEIR Chapter 2, Project Description, the Project analyses contained in the PEIR are based on assumptions pertaining to future growth through the horizon year 2045. Table 2-3 provides the growth projections for population, housing, and jobs under the General Plan 2045. In addition, it should be noted that the General Plan 2045 assumes residential growth to meet the next three Regional Housing Needs Assessment (RHNA) cycles that will occur during the timeframe of this General Plan. With regard to the density bonuses, it is unknown whether a developer would choose to apply a density bonus to a particular project. While one developer may choose to do that, another developer may not develop a property to its maximum allowed density. Therefore, it is speculative to assume that density bonuses would be used in all projects throughout the City. Please see Response 4-3 and Draft PEIR Chapter 2 for more detail.

Comment 5-4

4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

Response to Comment 5-4

This comment is the same as Comment 4-4. Please see Responses to Comment 4-4.

Comment 5-5

5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air

quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

Response to Comment 5-5

This comment is the same as Comment 4-5. Please see Response 4-5.

Comment 5-6

6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should beno more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

Response to Comment 5-6

This comment is the same as Comment 4-6. Please see Response to Comment 4-6.

Comment 5-7

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

Response to Comment 5-7

This comment is the same as Comment 4-7. Please see Response to Comment 4-7.

Comment 5-8

8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.

Response to Comment 5-8

This comment is the same as Comment 4-8. Please see Response to Comment 4-8.

Comment 5-9

9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 5-9

The comment seems to refer to the 2021-2029 Housing Element, which was adopted by the City on August 8, 2022 and certified by California Department of Housing and Community Development (HCD) on October 10, 2022. At this time, no amendments are being proposed to the adopted 2021-2029 Housing Element.

Letter 6

Yihui Gould

Received May 12, 2024

Comment 6-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 6-1

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

Letter 7

Gloria Mortitz

Received May 12, 2024

Comment 7-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact” (air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

- should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
 8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
 9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 7-1

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

Letter 8

Melissa Korc

Received May 13, 2024

Comment 8-1

This is a response to the General Plan EIR.

Here are my concerns:

Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need to account for the density bonus (doubles the allowed density)

Response to Comment 8-1

The comment expresses an opinion regarding the proposed density in Fox Hills. The comment will be forwarded to the decision makers for consideration. The comment does not raise an issue on the content of the Draft EIR. Therefore, no further response is warranted.

Comment 8-2

The CA law for composting is very difficult to meet in our buildings. Our buildings were built so long ago that we don't have enough space for trash, recycling and organic bins. This requires us to get the small cart which is not ideal in large buildings.

Response to Comment 8-2

The comment indicates that due to space constraints in older buildings in Fox Hills, it is difficult to meet state requirements for composting. Since the comment describes an existing condition and does not raise any issues with respect to the content or adequacy of the Draft EIR, no further response is necessary. However, the Greenhouse Gas Reduction Element acknowledges the role of composting in waste diversion from landfills. Goal GHG-5, Zero waste, is to increase resource capture and decrease waste sent to landfills. Implementation Action GHG-18 and GHG-19 include steps to increase organics and food waste diversion.

Comment 8-3

Our older buildings do not allow for EV charging. We tried adding it our building through a program with SCE. However, we were told it would require a transformer outside and the city denied the request. It makes us homeowners trying to keep our value of condo and help the environment be put in a tough spot. The new buildings would be built this [sic] with no consideration for us in older buildings.

Response to Comment 8-3

The comment raises challenges that exist with retrofitting older buildings with EV charging stations. Since the comment describes an existing condition and does not raise any issues with respect to the content or adequacy of the Draft EIR, no further response is necessary. However,

the Infrastructure Element and Greenhouse Gas Element acknowledge the importance of renewable energy. As discussed in the Infrastructure Element, the transition to all-electric infrastructure powered by renewable, carbon-free energy and associated energy conservation will require phased in requirements for new development and existing residences and businesses (General Plan 2045, page 177).

Comment 8-4

Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. There needs to be a study to assess the effect these new developments will have on the ocean breeze by a climate/weather expert. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

Response to Comment 8-4

This comment is the similar to Comment 5-2. Please see Response to Comment 5-2.

Comment 8-5

The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

Response to Comment 8-5

This comment is the same as Comments 4-3 and 4-4. Please see Responses to Comment 4-3 and 4-4.

Comment 8-6

Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 3 to 6 times from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,....), city services, schools, etc). In summary, our quality of life.

Response to Comment 8-6

This comment is the same as Comment 4-5. Please see Response to Comment 4-5.

Comment 8-7

Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

Response to Comment 8-7

This comment is the same as Comment 4-6. Please see Response to Comment 4-6.

Comment 8-8

Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

Response to Comment 8-8

This comment is the same as Comment 4-7. Please see Response to Comment 4-7.

Comment 8-9

We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots to build on. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre. (their plan is 75-100 units affordable units of the 1105 they are planning)

Response to Comment 8-9

This comment is the same as Comment 4-8. Please see Response to Comment 4-8.

Comment 8-10

FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 8-10

This comment is the same as Comment 5-9. Please see Response to Comment 5-9.

Letter 9

Yumi Mandt-Rauch

Received May 13, 2024

Comment 9-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.

Response to Comment 9-1

This letter is identical to Comments 5-1 through 5-8 within Letter 5. Please see Responses to Comments 5-1 through 5-8 for detailed responses.

Letter 10

Karyn Marks

Received May 12, 2024

Comment 10-1

I know it's easier to just throw all housing to Fox Hills. Fox Hills has ALWAYS been the "Redheaded Stepchild" of Culver City.

When you throw ALL of the housing to our area. You Clearly destroy our quality of life.

There is NO WAY the traffic will be acceptable. It is already impossible.

The architects told us to "fight all you want but this is a done deal." They said (and I quote) "The City Council plans to pack Fox Hills with housing."

This is a blatant disregard for all who live here, for all who supported you!

Response to Comment 10-1

The comment expresses an opinion regarding the General Plan 2045 and the increase in housing that would occur in Fox Hills. For clarification, the General Plan 2045 would introduce greater flexibility of uses, such as mixed-use, and allow residential uses in more areas of the City, including within industrial areas of the City. New mixed-use designations in activity centers and along commercial corridors would also enable greater opportunities for future residential development. Draft PEIR Figure 2-6 shows the proposed General Plan Land Use Map and Table 2-2 provides the proposed land use designations.

Comment 10-2

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver

City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,....), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should beno more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 10-2

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

Letter 11

Gil Ramirez

Received May 24, 2024

Comment 11-1

I am writing in response to the concerns raised about the General Plan EIR regarding the proposed zoning density changes in Fox Hills. It's my understanding that I missed the May 13th deadline to submit such comments, but I thought it best to submit them nonetheless. While I understand and appreciate the apprehensions of my fellow residents, I believe there are significant benefits to the proposed plan that warrant consideration. Below, I address the specific concerns highlighted.

Response to Comment 11-1

The comment is introductory and expresses support for the Project. Responses to the specific comments are provided below in Responses to Comments 11-2 through 11-9.

Comment 11-2

1. **Zoning Density:** The proposed density increase to 100 units/acre with the potential for a density bonus may seem excessive at first glance. However, it is essential to recognize the pressing need for housing in Culver City and the broader region. Higher density zoning can help address the housing shortage, reduce housing costs, and provide more affordable housing options. Moreover, modern urban planning techniques can mitigate the potential negative impacts on infrastructure and quality of life.

Response to Comment 11-2

The comment provides support for the density of up to 100 du/ac allowed by the Mixed Use High proposed in Fox Hills south of Slauson. As the comment does not raise an issue with the content or adequacy of the Draft PEIR, no further response is needed. The comment will be forwarded to the decision makers for their review and consideration.

Comment 11-3

2. **Cooling Systems and Ocean Breeze:** The concern about blocking ocean breezes and increasing temperatures is valid, but it is important to note that new developments can be designed to minimize these effects. Architects and planners can incorporate designs that allow for airflow and utilize advanced cooling technologies that are energy-efficient and environmentally friendly. Additionally, a study by climate and weather experts can be conducted to ensure that new developments do not significantly impact the natural cooling benefits currently enjoyed by residents.

Response to Comment 11-3

The comment indicates that future developments can incorporate designs to allow airflow and use cooling technologies that are energy-efficient and environmentally friendly. The comment

suggests that a study could be prepared to ensure that future developments do not significantly impact the ocean breezes. For informational purposes, a review of NOAA wind rose maps for the Santa Monica Airport and Los Angeles International Airport show that wind patterns during the warmer summer months (July to September) primarily hail from a southwesterly direction in the coastal region of Los Angeles, but it is also acknowledged that a minor percentage of the wind comes directly from the west. Some of the roads in Fox Hills run generally in a southwesterly to northeasterly direction, which would allow the majority of the winds out of the southwest to pass through the area without significant obstruction. As indicated in the Draft PEIR, the City anticipates that given the topography as well as the setbacks and building articulation required in the Zoning Code Update standards, breezes would not be notably obstructed. However, as indicated in Draft PEIR Section 4.1, Aesthetics, comments received during the scoping process regarding ocean breezes were specific to the Fox Hills neighborhood and concern that the increase in density and building height could affect ocean breezes. A study and more detailed analysis were not provided in the Draft PEIR since the CEQA Guidelines do not provide a threshold pertinent to ocean breezes.

Comment 11-4

3. Environmental Impact: The Environmental Impact Report (EIR) acknowledges “Unavoidable Significant Impact” in areas such as air quality, noise, and transportation. It is crucial to ensure that the EIR fully accounts for maximum development scenarios, including potential density bonuses. This transparency allows for better planning and the implementation of mitigation strategies to minimize these impacts. However, increased density can also lead to more efficient land use, reducing sprawl and preserving open spaces elsewhere.

Response to Comment 11-4

As indicated in Draft PEIR Executive Summary, Section ES.4, the Project would result in significant unavoidable impacts with regard to air quality, cultural resources (historic), noise, and transportation. As discussed in Draft PEIR Chapter 2, Project Description, the Project analyses contained in the PEIR are based on assumptions pertaining to future growth through the horizon year 2045. The growth projections are based on an understanding of historic, current, and projected demographic and economic conditions in the City through 2045. The growth projections are not done on a parcel by parcel basis but rather, the projections allocate a total amount of growth for the City overall and by TAZ zone.

Table 2-3 provides the growth projections for population, housing, and jobs under the General Plan 2045. The General Plan 2045 is projected to result in a population of 62,400 persons in 2045 (an increase of 21,600 persons compared to the 2020 population); 28,310 households (an increase of 11,310 households compared to 2019 household count; and 84,300 jobs (an increase of 16,260 jobs compared to 2019 job count). The Draft PEIR evaluates this level of growth through the year 2045.

With regard to the density bonuses, it is unknown whether a developer would choose to apply a density bonus to a particular project. While one developer may choose to do that, another developer may not develop a property to its maximum allowed density. Therefore, it is

speculative to assume that density bonuses would be used in all projects throughout the City. Rather growth is projected for the City overall and assumes residential growth to meet the next three Regional Housing Needs Assessment (RHNA) cycles that will occur during the timeframe of this General Plan.

As indicated in Draft PEIR Chapter 2, Project Description, the General Plan 2045 establishes the long-range vision that reflects the aspirations of the community and provides policies to support that vision by guiding the physical growth of the city. The Land Use and Community Design Element articulates the vision and strategies relative to the proposed land use pattern.

Comment 11-5

4. Quality of Life and Community Character: While concerns about losing Fox Hills's unique character are valid, it is important to recognize that neighborhoods' character naturally evolves over time. Fox Hills has undergone numerous changes over the years, adapting to its residents' needs and the broader societal trends. This evolution is a testament to our community's resilience and dynamism.

Historically, Fox Hills has seen various phases of development, from its early days with single-family homes to the introduction of multifamily units and commercial spaces. Each phase brought new amenities, infrastructure improvements, and a broader mix of residents, enhancing the area's vibrancy and economic diversity. This continuous evolution has enriched the community, making it more inclusive and dynamic.

Response to Comment 11-5

The comment addresses the evolution of areas that occur over time. As indicated in Draft PEIR Chapter 2, the underlying purpose of the Project is to comprehensively update the General Plan to establish a long-range vision that reflects the unique needs of the City and provides clear direction to improve the quality of life for residents, businesses, and visitors. Land Use and Community Design Element Goal LU-7 focuses on Fox Hills to address the changes that are anticipated under the General Plan 2045. The comment does not raise an issue with the content or adequacy of the Draft PEIR and no further response is needed.

Comment 11-6

Cities are living entities that must evolve to meet the changing needs of their inhabitants. With the current housing crisis and increasing urban populations, higher-density developments are essential to provide affordable housing, reduce urban sprawl, and promote sustainable living. Thoughtful urban planning can ensure that these developments are integrated seamlessly with the existing environment, preserving the unique character of Fox Hills while accommodating new growth.

Additionally, higher-density housing can bring numerous benefits to the community, such as:

- **Increased Economic Activity:** More residents can support local businesses, leading to a more vibrant local economy.

- **Enhanced Public Amenities:** Higher density can justify the development of better public amenities, including parks, community centers, and public transportation, improving the quality of life for all residents.
- **Sustainability:** Concentrating development within existing urban areas helps preserve open spaces and reduces the environmental impact of suburban sprawl. Modern construction techniques and green building standards can further mitigate environmental concerns.

It is also worth noting that other cities that have embraced higher-density development have successfully maintained their unique character while providing much-needed housing and amenities. Examples from cities like Portland, OR, and Vancouver, BC, demonstrate that with careful planning and community involvement, it is possible to balance growth with preservation.

Response to Comment 11-6

The comment addresses the need for housing and provides benefits that can occur as a result of higher-density housing. The comment does not raise an issue with the content or adequacy of the Draft PEIR, and no further response is needed.

Comment 11-7

5. **Development Location and Density Allocation:** The proposal to concentrate higher density north of Slauson and limit density south of Slauson is a reasonable compromise. However, it is essential to balance this with the need for equitable development across the city. Ensuring that new developments include a mix of market-rate and affordable housing is crucial. Incentivizing developers to provide affordable units through density bonuses can be an effective strategy if properly managed.

Response to Comment 11-7

Draft PEIR Figure 2-6 shows the proposed General Plan Land Use Map. The Mixed Use High designation, which would allow up to 100 du/ac, is located south of Slauson. In addition, areas south of Slauson would be designated Medium Density Multifamily (maximum of 50 du/ac) and High Density Multifamily (maximum of 70 du/ac). The Fox Hills area north of Slauson would be designated Mixed Use Corridor 2 and Medium Density Multifamily, both of which allow a maximum of 50 du/ac. Land Use and Community Design Element Goal LU-1 and associated policies address affordable housing.

Comment 11-8

6. **State Compliance and Developer Incentives:** It is true that state regulations require cities to plan for adequate housing across all income levels. Reducing density too much could jeopardize compliance with these requirements. However, the city has leverage in negotiating with developers to ensure that new projects meet community needs while still providing sufficient housing units.

Response to Comment 11-8

The Housing Element, which was adopted by the City on August 8, 2022 and certified by HCD on October 10, 2022, addresses the provision of adequate housing across all income levels. The Project would amend the land use designations and zoning to implement the adopted Housing Element. The comment does not raise issue with respect to the content or adequacy of the Draft EIR and no further response is necessary.

Comment 11-9

In conclusion, while the concerns raised about the proposed density increases in Fox Hills are valid, they can be addressed through careful planning and community engagement. Increased density, if managed well, can bring numerous benefits, including more affordable housing, better land use, and a more vibrant community. It is crucial for the city to conduct thorough studies, engage with residents, and implement measures to mitigate any adverse impacts, ensuring that the development benefits all members of the community.

Response to Comment 11-9

The comment is conclusionary and provides a general summary of the issues raised. The comment does not raise issue with respect to the content or adequacy of the Draft EIR and no further response is necessary.

Letter 12

Pouran Saeedi

Received May 12, 2024

Comment 12-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 12-1

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

Letter 13

Judi Sherman

Comment 13-1

Per the Advance Planning Division, the 100 units/acre density designation was not put on the north side of Slauson, which presently has no housing and far less traffic than the south side of Slauson, because of **developer preference for larger parcels**, thus the south side of Slauson is presently designated for 100 units/acre under the city's Draft GP. This decision resulted in thus far, 3 developers, proposing a total of 1706 units with most likely more proposals to be submitted to include a probable large development in the former site of CVS on Bristol Parkway, adding most likely another proposed 700 to 1000 units. All these proposals are concentrated on the south side of Hannum, which is even a smaller area of concentration than just the south side of Slauson. Presently all of the 2800 units in 26 complexes in Fox Hills, located south of Hannum, make it the densest housing area in Culver City.

Response to Comment 13-1

The majority of Fox Hills residences are located south of Slauson although there are some existing residences north of Slauson. As discussed in Draft PEIR Chapter 2, Project Description, the Project analyses contained in the PEIR are based on assumptions pertaining to future growth through the horizon year 2045. The growth projections are based on an understanding of historic, current, and projected demographic and economic conditions in the City through 2045. The total housing unit number was calculated by considering existing housing units as of 2019, the City's ADU permitting history, the Housing Element's projection of SB 9 unit construction, pipeline projects (projects that are under construction, have been entitled, or are in the planning stage), and projected new housing units.

This comment relates to the General Plan 2045 and does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, no further response is necessary. However, the comment is forwarded to decision makers for their consideration.

Comment 13-2

According to the results of the EIR, there will be a potential for **Unavoidable Significant Impact** on several areas to include air quality, noise and transportation. Based on the above results of the EIR, please clarify, if the same significant impact on air quality would occur with development of 100 units per acre as with 50 units per acre? Or, let's say, that a bulk of the units would be on the north side of Slauson. Would that also produce the same unavoidable impact on air quality for the south side of Slauson, where all the building is being proposed now? Please be specific with documented proof.

Response to Comment 13-2

As indicated in the comment, the Draft PEIR identifies a potential for significant unavoidable air quality, noise, and transportation impacts as a result of buildout of future development that would occur under the Project. For clarification, as indicated in the Draft PEIR Executive

Summary, Section ES.4, the Project would also result in a significant unavoidable impact with regard to cultural resources (historic).

The construction air quality analysis is based on the size of the construction site, the number of construction equipment operating at a time, distance to sensitive receptors, as well as other variables. The operational air quality analysis is based on the operational intensity of the development and if there are any new stationary or portable sources. As indicated in Draft PEIR Chapter 1, Introduction, the document provides a program-level analysis and as such does not evaluate the project-specific impacts of individual developments that would be allowed under the Project.

With regard to construction, as discussed in Draft PEIR Section 4.2, Air Quality (page 4.2-39), there are no specific projects currently proposed under the General Plan and Zoning Code Update and the timing of construction, location or the exact nature of future projects is unknown. Therefore, a project-specific analysis of construction emissions would be speculative. In addition, at a program level the analysis is a general analysis of impacts that could occur in a large geographical area as a result of buildout within the area, and not specific impacts that would occur in a smaller area from a specific project. Information regarding specific development projects, including buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other related information is necessary in order to provide a detailed estimate of emissions. Absent this information, emissions modeling is not feasible.

With regard to operations, as shown in Draft PEIR Table 4.2-7 (page 4.2-41), the net change in operational emissions from existing conditions (2019) compared to existing plus buildout of new development under the General Plan 2045 and Zoning Code Update would not exceed the SCAQMD regional significance thresholds, with the exception of VOC emissions that would exceed the threshold. Applicants for future projects developed under the General Plan 2045 and Zoning Code Update would be required to comply with SCAQMD rules and regulations as well as conduct CEQA analyses, if necessary, in order to determine significance based on the individual project specifics. The subsequent environmental documents for specific projects under the General Plan 2045 and Zoning Code Update would include, if necessary, an air quality analysis that will contain the calculations of construction and operational emissions, to determine the significance of impacts. Therefore, at the program level, the analysis of air quality impacts that could occur from specific projects under the Project is not feasible.

Comment 13-3

As verified by the Advance Planning manager, the reason that the 100 unit/acre designation was not placed on the north side of Slauson in Fox Hills is developer preference for larger parcels and that he said that was the only reason he could think of. The Community Development Director stated: **“An EIR requires the study of a reduced density alternative. As there is already a designation of 65 units/acre, 80 units/acre was selected as there needs to be a significant difference between existing densities (in this case, between 65 and 100). ESA, in conjunction with City staff, developed that option.”** This response was emailed to me when I wrote: **“We know about the housing element and that if the land use element is changed to decrease**

density designation in certain areas it would have to be done by City Council. The "option" of 80 units/acre, as you know, would not significantly decrease the density south of Slauson and is not a serious option at all."

Response to Comment 13-3

As indicated in Draft PEIR Chapter 5, Alternatives, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process for an EIR, which is intended to consider ways to mitigate or avoid the significant environmental effects of a project. CEQA Guidelines Section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives but avoid or substantially lessen any identified significant adverse environmental effects of the project. In addition, an EIR is not required to consider every conceivable alternative to a project or alternatives that are infeasible. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

The Draft PEIR discusses the process of the selection of alternatives and describes alternatives that were considered by the City and eliminated from further evaluation. The Draft PEIR describes and evaluates three alternatives: No Project Alternative, Concentrated Growth Alternative, and Modified Mixed Use High Designation Alternative. Table 5-1 provides a comparison of the population, housing units, and jobs that would occur under the Project and the three alternatives.

As described in Draft PEIR Section 5.5.3, the Modified Mixed Use High Designation Alternative would have a maximum density of 80 units per acre (rather than 100 units per acre) in the areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. The Modified Mixed Use High Designation Alternative would result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project.

The Draft PEIR provides a qualitative analysis of the alternatives compared to the Project. Table 5-2 provides a comparison of the impacts of the Project and the alternatives. As shown in Table 5-2, while the reduction in growth that would occur under Alternatives 2 and 3 would reduce potentially significant environmental impacts, significant unavoidable impacts would occur relative to air quality, cultural resources (historic), noise, and transportation.

Comment 13-4

You must give a logical explanation (not developer preference) as to why the 100 units/acre designation will not be changed to the north side of Slauson in Fox Hills. Then, the lower density could go on the south side of Slauson. If the city was really concerned about air quality and its impact on citizens, tell us why it is not being done. 50 units/acre would be most desirable, as we know now that the developers can get their density doubled anyway.

Response to Comment 13-4

The comment expresses an opinion regarding the proposed density in Fox Hills. The comment will be forwarded to the decision makers for consideration.

As indicated in Draft PEIR Chapter 1, Introduction, the document provides a program-level analysis and as such does not evaluate the project-specific impacts of individual developments that would be allowed under the Project. The analyses are based on growth projections, based on an understanding of historic, current, and projected demographic and economic conditions in the City, through 2045.

With regard to air quality, Section 4.2, Air Quality, evaluates the potential construction and operational air quality impacts that would occur as a result of the Project. As discussed in Response to Comment 13-2, at a program level the analysis is a general analysis of impacts that could occur in a large geographical area as a result of buildout within the area, and not specific impacts that would occur in a smaller area from a specific project. Please see Response to Comment 13-2 for a more detailed discussion regarding the air quality analysis in the Draft PEIR.

Comment 13-5

Presently, the residents in Fox Hills have natural breeze to cool their units and the present infrastructure have either no capacity for air conditioning or only for portable air conditioning. Given the air blockage that will occur with these new developments, reaching 7 stories high, this will affect residents tremendously. When I asked how the city is addressing this issue, I received the following comment from Advance Planning: **““CEQA Guidelines do not provide a threshold pertinent to ocean breezes. The City anticipates that given the topography as well as the setbacks and articulation required in the Zoning Code Update standards, that breezes would not be obstructed.” Documented scientific proof from a weather/climate expert is needed and not a general statement. Please address responsibly.**

Response to Comment 13-5

The comment raises concerns regarding the potential effects resulting from the increase in building height in Fox Hills that would occur as a result of the Project relative to ocean breezes. As indicated in the comment and in Draft PEIR Section 4.1, Aesthetics, CEQA Guidelines do not address ocean breezes. As indicated in the Draft PEIR, the City received comments during the scoping process regarding ocean breezes specific to the Fox Hills neighborhood and the concern that the increase in density and building height could affect ocean breezes.

For informational purposes, a review of NOAA wind rose maps for the Santa Monica Airport and Los Angeles International Airport show that wind patterns during the warmer summer months (July to September) primarily hail from a southwesterly direction in the coastal region of Los Angeles, but it is also acknowledged that a minor percentage of the wind comes directly from the west. Some of the roads in Fox Hills run generally in a southwesterly to northeasterly direction, which would allow the majority of the winds out of the southwest to pass through the area without significant obstruction. As indicated in the Draft PEIR, the City anticipates that given the topography as well as the setbacks and building articulation required in the Zoning

Code Update standards, breezes would not be notably obstructed. Regardless, as this is not considered an impact under CEQA, no further response is necessary on this topic.

Letter 13A

Judi Sherman

The following comments were submitted by email over the course of a few days. Please also see written comments above from this individual.

Comment 13A-1

I was under the impression that ESA did the report and they identified the significant impact problems and not the city. Is that correct?

To clarify, for example, the same significant impact on air quality would occur with development of 100 units per acre as with 50 units per acre? FYI: South of Hannum, the tally is up to 1709 units of mixed-use development with more than likely, another 1000 units to be proposed at the Fox Hills Plaza site, which would total 2700 units. Or, let's say, that a bulk of the units would be on the north side of Slauson. Would that also produce the same unavoidable impact on air quality for the south side of Slauson, where all the building is being proposed now?

Response to Comment 13A-1

As discussed in Draft PEIR Chapter 1, Introduction, the City of Culver City is the Lead Agency. The public agency can either prepare the EIR or have a third party prepare the document under contract to the agency in accordance with Public Resources Code Section 21082.1(a). In this case, ESA prepared the PEIR under contract to the City. However, the City, as Lead Agency, is required to review the document and ensure that the document reflects the City's independent judgement. Please also see Response to Comment 13-2 for a discussion regarding the air quality analysis in the Draft PEIR relative to geographic areas.

Comment 13A-2

Also, who in "The City" determined the conclusions regarding the ocean breeze? Were they climate scientists or someone with expertise in the field of weather/climate? Please let us know who actually showed documented proof that ocean breezes would not be obstructed by the magnitude of development proposed in Fox Hills on the south side of Slauson.

Response to Comment 13A-2

Please see Response to Comment 13-5 for a discussion regarding ocean breezes.

Comment 13A-3

So, at this point with air quality, noise, and the other items that have been analyzed by ESA as having significant impact that is unavoidable, what is the city obligated to do regarding these problem areas.

I realize that ESA listed the ocean breeze issue as a concern, so how is the city planning to address this issue? Actually that is the question I meant to ask.

Response to Comment 13A-3

As indicated in Draft PEIR Chapter 1, Introduction, in accordance with CEQA Guidelines Section 15093, if a public agency approves a project that has significant impacts that cannot be mitigated to less than significant levels, the agency must state in writing the specific reasons for approving the project, based on the Final PEIR and any other information in the public record for the project. More specifically, as indicated in CEQA Guidelines Section 15093(a) the Guidelines require "...the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project."

With regard to the ocean breezes, please see Response to Comment 13-5.

Comment 13A-4

As always, thanks so much for your responses.

The blockage of ocean breeze due to the proposed housing projects and its effect on climate control in Fox Hills was included in the comments as a problem (Appendix 3). Is that issue addressed anywhere by the ESA in the EIR? I believe that was not covered in the EIR although maybe I missed it.

Response to Comment 13A-4

As indicated in Draft PEIR Executive Summary, Section ES.3, ocean breezes were raised as an issue in the scoping comments received by the city in response to the Recirculated Notice of Preparation (NOP). The ocean breeze issue was specific to Fox Hills. The comments received are provided in Appendix A-3. Please see Response to Comment 13-5 for a discussion regarding ocean breezes.

Comment 13A-5

Can you please verify that I am interpreting the analysis correctly re: **Air Quality and Noise sections** of the EIR as follows?

When the report is explaining that there is unavoidable significant impact regarding the air quality and noise, I assume they mean to be addressing the General Plan as it is presently. Is that correct?

Then, when they go on to say that any mitigating strategies would not reduce the significant impact on air quality and noise, I am again assuming they mean that as the GP is now, nothing would really result in any improvement in air quality or noise abatement. Is that correct?

Response to Comment 13A-5

Draft PEIR Chapter 2, Project Description, describes the General Plan 2045 and Zoning Code Update (Project) that are evaluated in the Draft PEIR. The analyses in the Draft PEIR evaluate the growth that would occur under the proposed General Plan 2045 and the Zoning Code Update.

Table 2-3 provides the growth projections for population, housing, and jobs under the General Plan 2045. If significant environmental effects are identified, mitigation measures are recommended. As indicated in the Draft PEIR, even with the implementation of mitigation measures the Project would result in significant unavoidable impacts with regard to air quality, cultural resources (historic), noise, and transportation.

Comment 13A-6

Lastly, the section in the Executive Summary regarding “**Issues raised during the preparation process and areas of controversy**” there is a statement that these issues would be addressed later on. When will that be, if you have any idea of that timeline?

Response to Comment 13A-6

As indicated above Draft PEIR Section ES.3 lists the issues raised during the scoping process. The text does not suggest that these issues would be addressed later.

Letter 14

Sequoia Tully

Received May 12, 2024

Comment 14-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 14-1

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

Letter 15

Louise Wechsler

Received May 7, 2024

Comment 15-1

I am a 16 year resident of Fox Hills and condo owner who is opposed to the proposed housing developments planned for our neighborhood. We already have one of the densest housing areas in Culver City. The proposed new housing will only add to our traffic and noise issues. Please reconsider, and move the proposed new housing (which certainly is needed) to the northern side of Slauson, which lacks residential buildings.

Response to Comment 15-1

The comment provides an opinion regarding the proposed density in Fox Hills and indicates that the new housing should be located north of Slauson. The comment expresses concern regarding traffic and noise impacts but does not raise any specific issues related to these topics. Please see Draft PEIR Section 4.12, Noise, and Section 4.16, Transportation, for the respective analyses of these issues.

Letter 16

Jeff Willis

Received May 12, 2024

Comment 16-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows “Unavoidable Significant Impact”(air quality, noise, transportation).Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city’s decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson

- should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
 8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
 9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Response to Comment 16-1

This letter is identical to Letter 5. Please see Responses to Comments 5-1 through 5-9 for detailed responses.

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CHAPTER 3

Revisions, Clarifications, and Corrections to the Draft PEIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132 (a), this Chapter of the Final EIR provides changes to the Draft PEIR that have been made to clarify, correct, or supplement the information provided in that document. The changes described in this Chapter do not add significant new information to the Draft PEIR that would require recirculation of the Draft PEIR. 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. CEQA Guidelines Section 15088.5 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 PEIR, 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 PEIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft PEIR 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.

Executive Summary

1. Subsection ES.6, Summary of Environmental Impacts, Table ES-1, Summary of Project Impacts and Mitigation Measures, the following revisions are made to MM BIO-1 in the first sentence:

MM BIO-1. Baseline Biological Assessment: The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat (see Figure 34, Vegetation, of the Conservation Element) provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats.

2. Subsection ES.6, Summary of Environmental Impacts, Table ES-1, Summary of Project Impacts and Mitigation Measures the following revisions are made to MM BIO-2 in the second sentence:

MM BIO-2. Nesting Bird Surveys: Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any tree and/or vegetation removal within the Project site.

3. Subsection ES.6, Summary of Environmental Impacts, Table ES-1, Summary of Project Impacts and Mitigation Measures the following revisions are made to MM CUL-1:

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

impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.

Chapter 2, Project Description

1. Page 2-16, Subsection entitled High Density Residential, revise the sentence as follows:

High Density Multifamily designation allows a maximum density of ~~70100~~ du/ac. These dwelling units can be configured into a variety of multifamily housing types.

2. Subsection 2.4.2, Zoning Code Update, update Figure 2-15, Proposed Zoning Map, to change the publicly owned land in the northeastern portion of the City, from Single Family to Open Space. This includes the Los Angeles County Stoneview Nature Center and the Baldwin Hills Conservancy hiking trail. In addition, change the color of the Planned Development areas from tan to blue.

See updated Figure 2-15 at the end of this chapter.

Section 4.3, Biological Resources

1. Subsection 4.3.4, Project Impact Analysis, under Mitigation Measures the following revisions are made to MM BIO-1 in the first sentence:

MM BIO-1. Baseline Biological Assessment: The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat (see Figure 34, Vegetation, of the Conservation Element) provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats.

2. Subsection 4.3.4, Project Impact Analysis, under Mitigation Measures the following revisions are made to MM BIO-2 in the second sentence:

MM BIO-2. Nesting Bird Surveys: Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any tree and/or vegetation removal within the Project site.

Section 4.4, Cultural Resources

1. Subsection 4.3.4, Project Impact Analysis, under Mitigation Measures the following revisions are made to MM CUL-1:

MM CUL-1. Prior to development of any individual projects that are subject to CEQA within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center or Built Environment Resources Directory (BERD) search; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified potentially eligible historic resources will

be assessed for the project’s potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be fully evaluated for its potential significance under national and state criteria prior to the City’s approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.

Section 4.16, Transportation

1. Subsection 4.16.3, Regulatory Framework, under Regional the following text is added to the end of the section:

LA Metro NextGen Bus Plan

The NextGen Bus Plan was approved by the Metro Board of Directors in October 2020. The plan was developed to implement a new competitive bus system in Los Angeles County that is fast, frequent, reliable, and accessible. The proposed improvements will double the number of frequent metro bus lines; provide more than 80 percent of current bus riders with 10 minute or better frequency; improve and expand midday, evening, and weekend service, creating an all-day, 7-day-a-week service; ensure a quarter mile walk to a bus stop for 99 percent of current riders; and create a more comfortable and safer waiting environment.

2. Page 4.16-19 under Impact TR-1, the fifth paragraph is revised as follows:

The General Plan 2045 would not preclude the implementation of the Short Range Mobility Plan, and would provide complimentary goals, policies, and implementation actions that would include transit improvements (Goal M-3). Additionally, the Mobility Element would support and complement the measures, objectives, and policies in the City’s Bicycle and Pedestrian Action Plan (Policies M-2.1, M-2.2, M-4.4, M-8.5). Further, the Mobility Element places an emphasis on Complete Streets and a layered transportation network consistent with the City’s Complete Streets Policy (Goal M-2). The City’s Local Road Safety Plan (LRSP) establishes a series of goals and objectives to identify high-risk roadways and create continued safety. The Mobility Element would establish the goal of providing a transportation network that is safe and accessible for all travel modes (Goal M-1). As the Mobility Element aims to provide more reliable, safe, affordable, convenient, clean, and connected mobility options for people of all ages and abilities, it is consistent with the goals and objectives outlined in the CTP 2050 as described above. Lastly, the Mobility Element would provide policies in support of coordinating connections to Metro regional bus and rail services, consistent with LA Metro’s NextGen Bus Plan (Policies M-3.1, M-3.4, M-4.5, M-6.2).

D:\180517_00 - Culver City General Plan Update\05 Graphics-QIS-Modeling\Illustrator

Residential Uses

- Single Family - 8.7 du/ac
- Two Family - 17.4 du/ac
- Low Density Multifamily - 35 du/ac
- Medium Density Multifamily - 50 du/ac
- High Density Multifamily - 70 du/ac

Mixed Uses

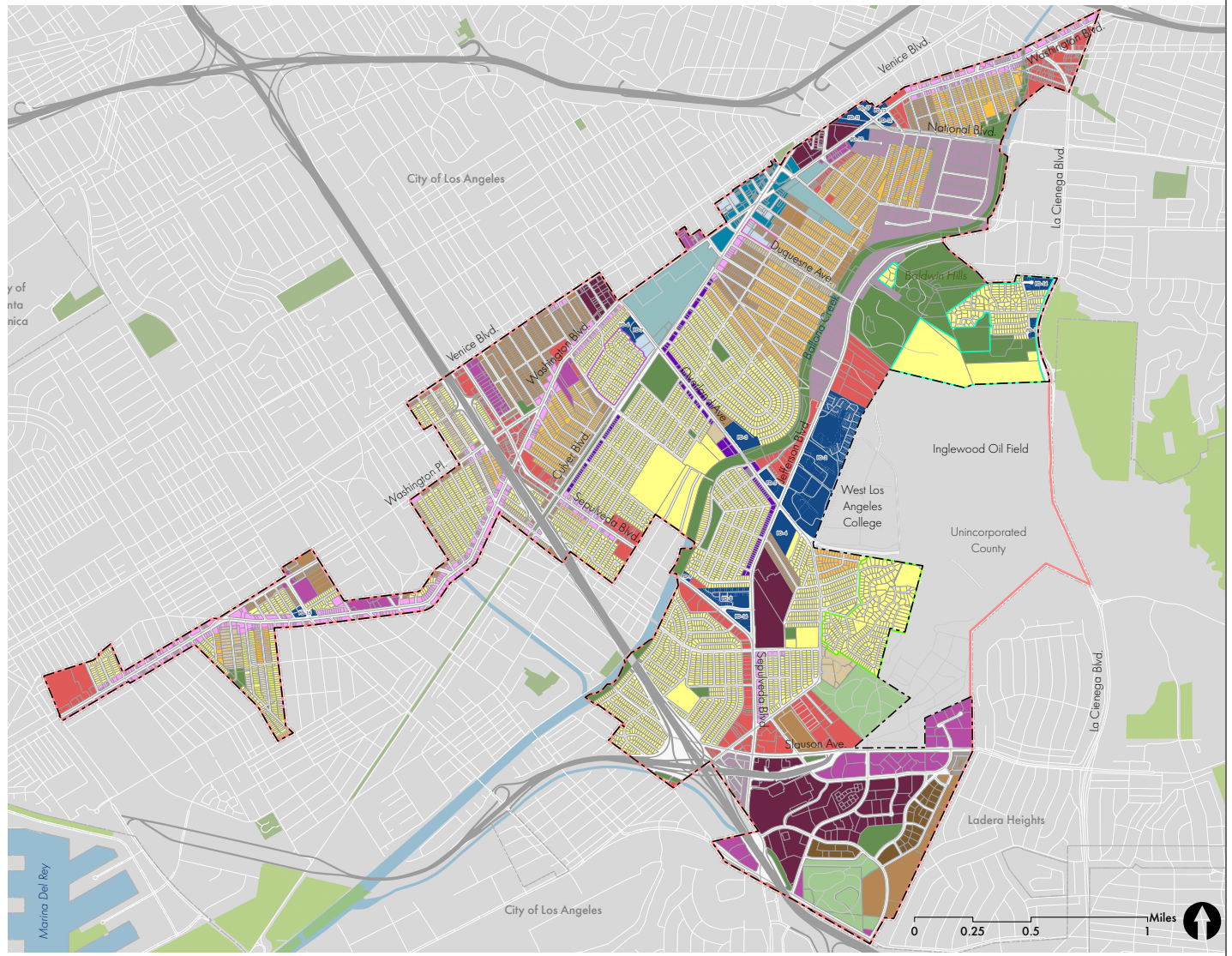
- Mixed Use Neighborhood - 35 du/ac
- Mixed Use Corridor 1 - 35 du/ac
- Mixed Use Corridor 2 - 50 du/ac
- Mixed Use Downtown - 65 du/ac
- Mixed Use Medium - 65 du/ac
- Mixed Use Industrial - 65 du/ac
- Mixed Use High - 100 du/ac

Special Uses

- Planned Development
- Institutional
- Studio
- Open Space
- Cemetery
- Transportation

Overlays

- Residential Hillside Overlay - Culver Crest
- Residential Hillside Overlay - Blair Hills
- Residential Zero Setback Overlay
- Civic Center Overlay
- Waterbody
- City Park
- County and State Park
- City Limits
- Sphere of Influence



SOURCE: City of Culver City, 2024; County of Los Angeles, 2021; ESRI, 2021

Culver City General Plan 2045

Figure 2-15
Proposed Zoning Map
(Revised)



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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, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. The City of Culver City is the Lead Agency for the General Plan 2045 and Zoning Code Update. Collectively referred to as the Project.

The MMP provides the mitigation measures for the Project and the monitoring implementation responsibility for each measure. The MMP for the Project will be in place through all phases of implementation of the Project, including design, construction, and operation.

**TABLE 4-1
MITIGATION MONITORING PROGRAM FOR THE GENERAL PLAN 2045 AND ZONING CODE UPDATE**

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
Air Quality			
<p>MM AQ-1: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of NOX, CO, PM10 and/or PM2.5 shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations. Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.</p>	Project Applicant	Prior to and during construction	Culver City Planning and Development Department
<p>MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.</p>	Project Applicant	Prior to and during construction	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
<p>MM AQ-3: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, show on the building plans that all major appliances (dishwashers, refrigerators, clothes washers, and dryers) to be provided/installed are Energy Star– certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star or equivalent appliances shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p>	Project Applicant	Prior to issuance of a building permit	Culver City Planning and Development Department
<p>MM AQ-4: Applicants for new residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the feature below has been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> For multifamily dwellings, electric vehicle charging shall be provided as specified in Section A4.106.8.2 (Residential Voluntary Measures) of the CALGreen Code (or its successor code). 	Project Applicant	Prior to issuance of a building permit	Culver City Planning and Development Department
<p>MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). 	Project Applicant	Prior to issuance of a building permit	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
<p>MM AQ-6: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.</p>	Project Applicant	Prior to issuance of a building permit	Culver City Planning and Development Department
<p>MM AQ-7: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential health risk impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing health risk impacts. If health risk impacts are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.</p>	Project Applicant	Prior to issuance of a building permit	Culver City Planning and Development Department
Biological Resources			
<p>MM BIO-1: Baseline Biological Assessment. The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat (see Figure 34, Vegetation, of the Conservation Element) provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:</p> <ul style="list-style-type: none"> a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, § 15125(c)]. b. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018); 	Project Applicant	Prior to construction	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
<p>c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;</p> <p>d. A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, § 15380); and,</p> <p>e. Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance.</p> <p>f. Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.</p> <p>g. Avoidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented.</p>			
<p>MM BIO-2: Nesting Bird Surveys. Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any tree and/or vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p>	Project Applicant	Prior to and during construction	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
Cultural Resources			
<p>MM CUL-1: Prior to development of individual projects that are subject to CEQA within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior’s Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center or Built Environment Resources Directory (BERD) search; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified potentially eligible historic resources will be assessed for the project’s potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be fully evaluated for its potential significance under national and state criteria prior to the City’s approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.</p>	Project Applicant	Prior to construction	Culver City Planning and Development Department
<p>MM CUL-2: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project’s potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city’s approval of project plans and publication of subsequent CEQA documents.</p>	Project Applicant	Prior to construction	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
Geology and Soils			
<p>MM GEO-1: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.</p>	Project Applicant	Prior to and during construction	Culver City Planning and Development Department
Noise			
<p>MM NOI-1: Construction Noise. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:</p> <ul style="list-style-type: none"> • Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors. • Equip construction equipment with effective mufflers, soundinsulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT). • Limit non-essential idling of construction equipment to no more than five minutes per hour. <p>This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.</p>	Project Applicant	Prior to issuance of a grading or building permit	Culver City Planning and Development Department

Mitigation Measures	Implementing Party	Monitoring Phase	Responsible Monitoring Agency
<p>MM NOI-2: Construction Vibration. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction. Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:</p> <ul style="list-style-type: none"> • Jackhammer: 23 feet. • Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet. • Roller (for site ground compaction or paving): 75 feet. • Impact pile-driving: 280 feet. <p>This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.</p>	<p>Project Applicant</p>	<p>Prior to issuance of a grading or building permit</p>	<p>Culver City Planning and Development Department</p>

Appendix A
**Original Comment Letters on
the Draft EIR**



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

May 2, 2024

advance.planning@culvercity.org

Troy Evangelho, Advance Planning Manager
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

**Draft Program Environmental Impact Report (Draft PEIR) for the Proposed
Picture Culver City: General Plan 2045 and Zoning Code Update (Proposed Project)
(SCH No. 2022030144)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Culver City is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff’s Summary of Project Information in the Draft PEIR

1-1

Based on the Draft PEIR, the Proposed Project would replace the existing General Plan in its entirety to establish a long-term vision.¹ The land use designations in the Proposed Project are residential, mixed-use, and special purpose.² The residential designation ranges from single-family homes to multi-family housing; mixed-use designations provide areas for a range of residential and commercial uses; and the special purpose designations are for a range of institutional uses and public facilities.³ The Proposed Project would result in an estimated 12,700 new housing units⁴ and a net increase of 3.7 million square feet of non-residential development by 2045.⁵

South Coast AQMD Staff’s Comments on the Draft PEIR

Emission Reductions from Health Risk Strategies

When certifying an EIR for a project, retain the authority to include any additional information deemed relevant to assessing and mitigating the environmental impacts. South Coast AQMD is concerned about the potential public health impacts of sitting sensitive populations within the proximity of existing air pollution sources (e.g., freeways and railroads). For this reason, prior to approving future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in a new project and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the guidance provided in 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook:

1-2

¹ Draft PEIR. Page 2-8.

² *Ibid.* Page 2-13.

³ *Ibid.*

⁴ *Ibid.* Page 2-19.

⁵ *Ibid.* Page 2-20.

A Community Health Perspective,⁶ which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions; and 2) CARB’s technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.⁷

1-2
cont.

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are able to screen out greater than or equal to 50% of DPM,⁸ but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,^{9,10} a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft PEIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in Draft PEIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

1-3

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. In addition,

1-4

⁶ California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

⁷ CARB’s Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

⁸ U.S. EPA, “What is a MERV rating?” Available at: <https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating>

⁹ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>

¹⁰ International Journal of Indoor Environment and Health, Pilot Study of High-Performance Air Filtration for Classroom Applications, November 2012. Available at: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>



CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

1-4
cont.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD’s webpage at <http://www.aqmd.gov/home/permits>.

1-5

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency’s position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

1-6

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

LAC240402-04

Control Number



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

March 22, 2024

Project Name: General Plan 2045 and Zoning Code Update, Culver City

Thank you for your letter dated March 28, 2024. Regarding the project above. This is to concur that we agree with the Specific Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation

2-1

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 10, 2024

Troy Evangelho
City of Culver City
Advance Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Sent by Email: advance.planning@culvercity.org

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

Dear Mr. Evangelho:

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

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

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

Metro and the City have collaborated closely on several projects, including the Ivy Station Joint Development, Platform Greenspace, and active transportation improvements. We are

3-1

committed to continuing a collaborative approach with respect to this Plan and future development projects adjacent to the E Line (Expo) in the City.

Project Description

The Project includes an update to the General Plan to respond to the changing needs and conditions of the City and region to reflect new state laws. The General Plan will consist of 14 Elements. In addition to Elements required by the state, the General Plan Update (GPU) will also include Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure.

3-1
cont.

Recommendations for EIR Scope and Content

Transit Services and Facilities

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

3-2

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

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

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

3-3

Transit Supportive Planning: Recommendations and Resources

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

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of the Culver City Station within the Plan area and include strategies in proposed developments to orient pedestrian pathways towards the Station.

3-4

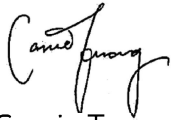
2. Transit Connections and Access: Given the Plan area’s proximity to Culver City Station, the Plan should include policies and/or design standards to accommodate transfer activity between bus and rail customers that will occur along the sidewalks and public spaces. Metro completed the Metro Transfers Design Guide, a best practice document on transit improvements. This can be accessed online at <https://www.metro.net/about/station-design-projects/> 3-5
4. Walkability: Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the Culver City Station. The City should consider requiring the installation of such amenities as part of the conditions of approval of projects within the Plan area. 3-6
5. Access: The Plan should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf 3-7
6. Active Transportation: Metro encourages the City to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or a secured bike room, for guests, employees, and residents. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. Additionally, the Plan should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the destinations within the Plan area. 3-8
7. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design. 3-9
8. Multi-modal Connections: With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Plan area and nearby transit services, including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc. 3-10
9. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. 3-11

These strategies could be pursued to reduce automobile-orientation in design and travel demand.

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

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

Sincerely,



Cassie Truong
Senior Transportation Planner
Transit Oriented Communities

cc: Shine Ling, AICP, Director, Development Review Team

Attachments and links:

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

↑
3-11
cont.

3-12

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

February 2021



Metro and Regional Rail Map

Metro & Regional Rail

metro.net
 pacificsurfliner.com
 metrolinktrains.com



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: <https://jpropublic.metro.net/in-take-form>

Additional Information & Resources

- Metro Development & Construction Coordination website: <https://www.metro.net/devreview>
- Metro GIS/KML ROW Files: <https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures: <https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro’s [NextGen Bus Plan](#) re-visions bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team

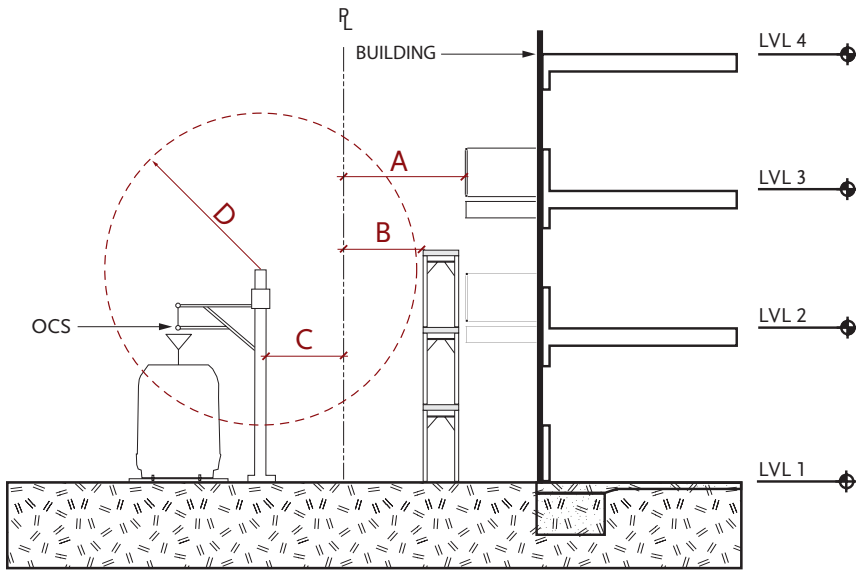
Website: <https://www.metro.net/devreview>

Online In-take Form: <https://jpublic.metro.net/in-take-form>

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



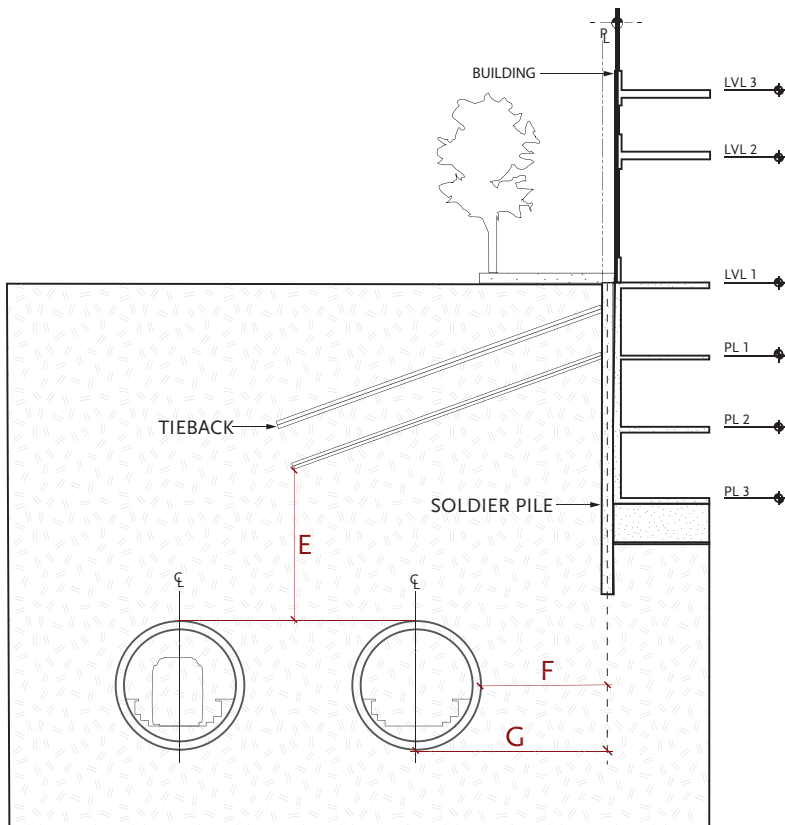
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process. Download Metro's ROW files [here](#).
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



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Site Plan & Conceptual Design

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1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.

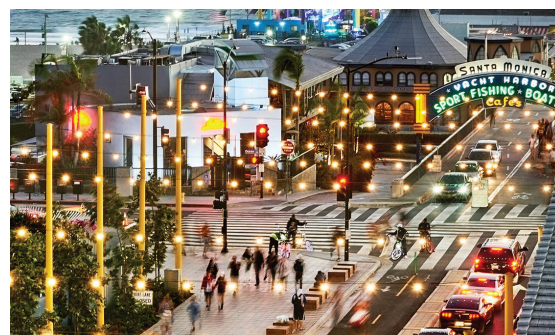


1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

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1.3 Building Setback

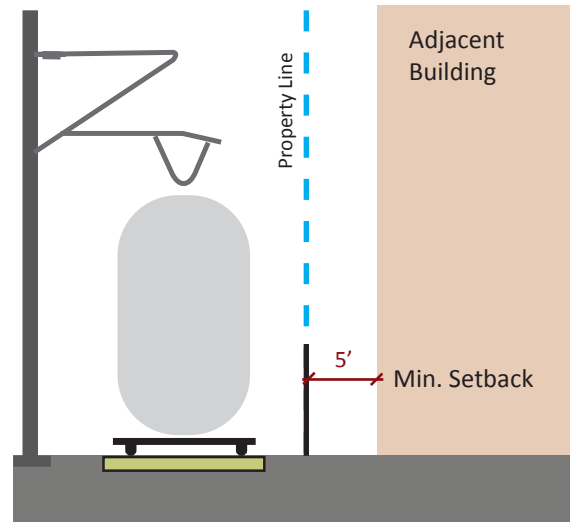
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

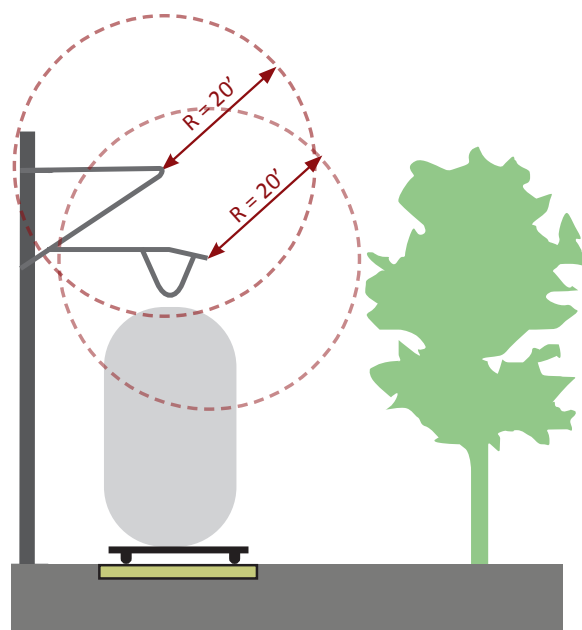


1.4 Overhead Catenary System (OCS) Clearance

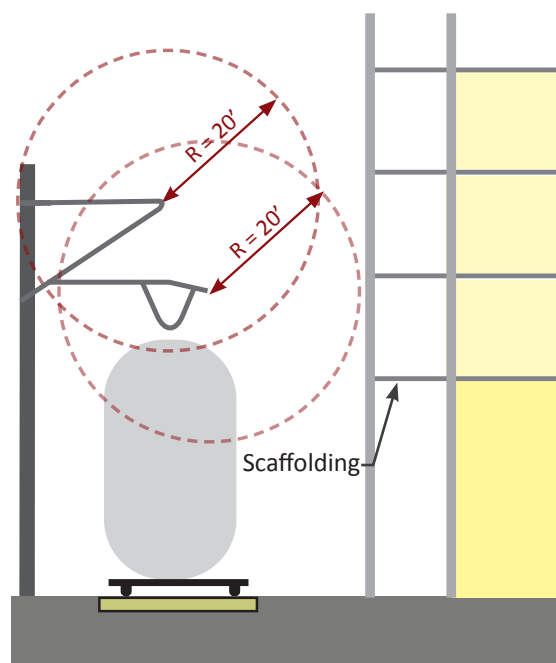
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

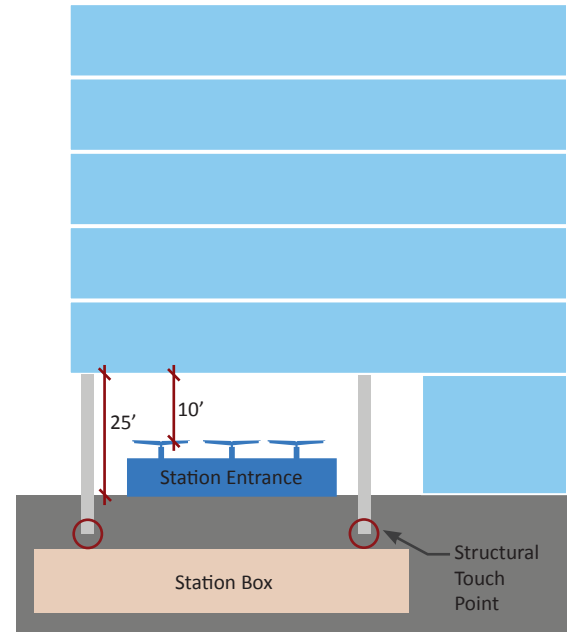
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1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.



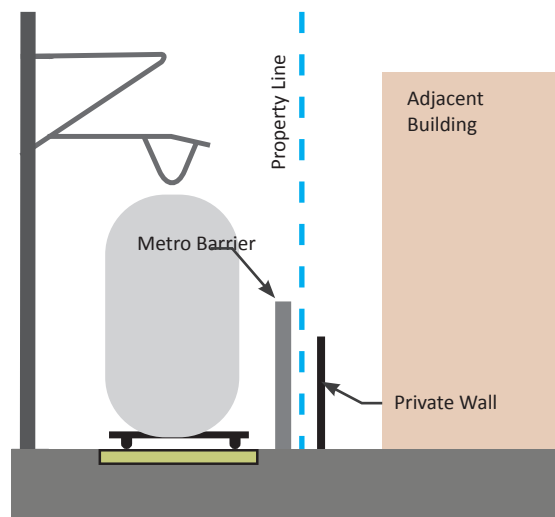
1.6 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

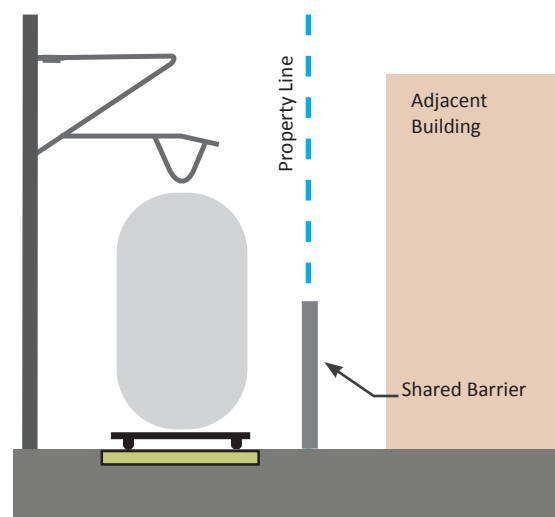
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

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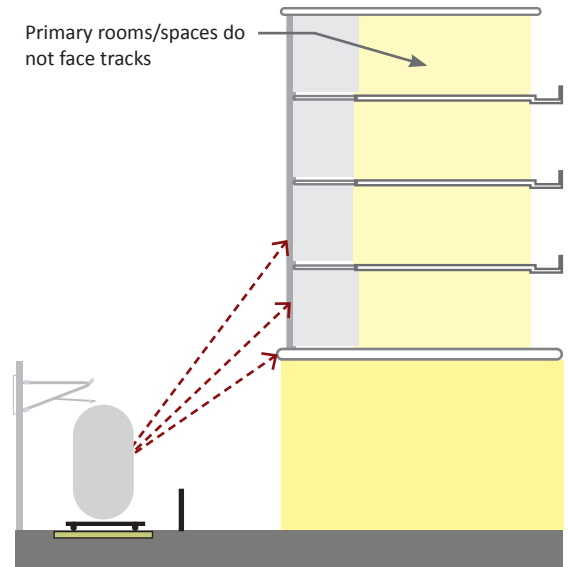
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

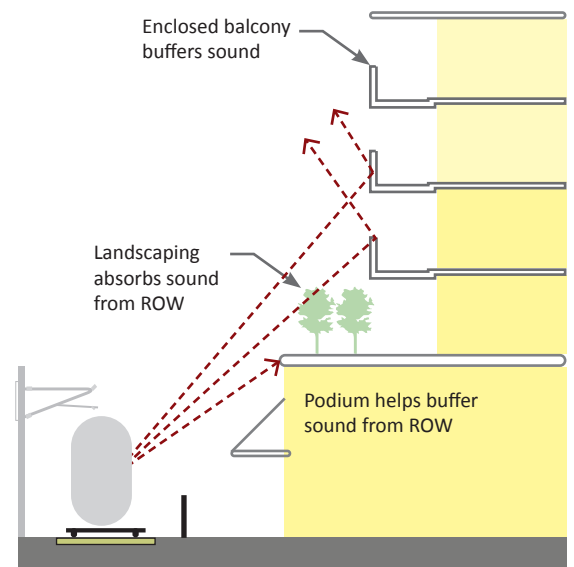
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.



1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

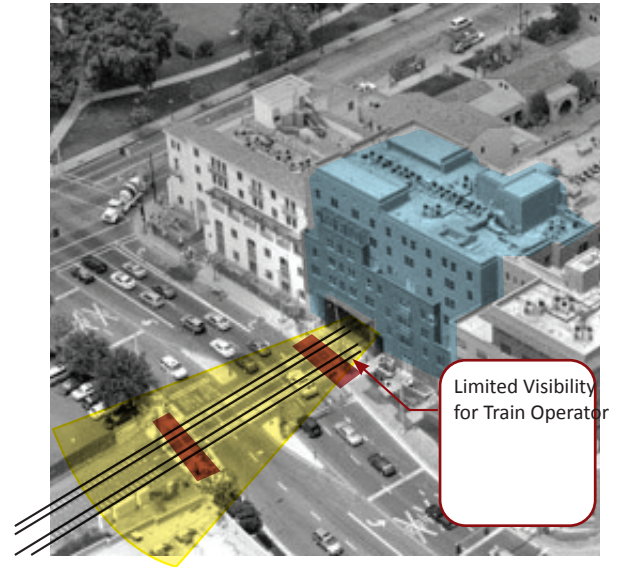
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1.9 Sight-Lines at Crossings

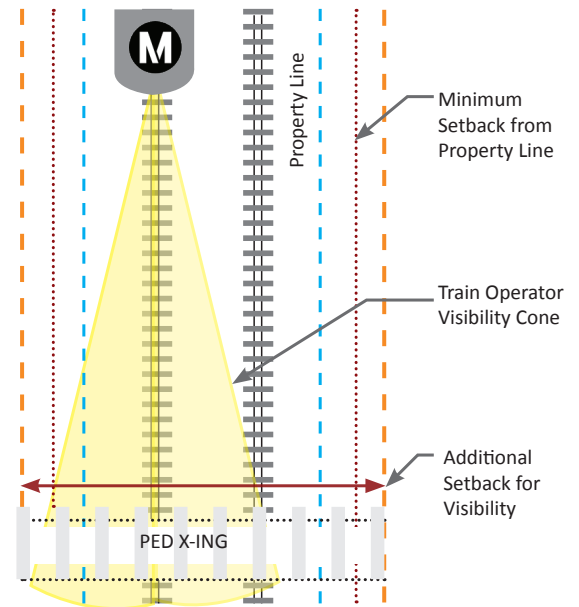
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

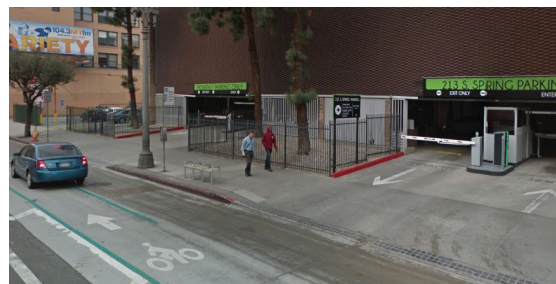


1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

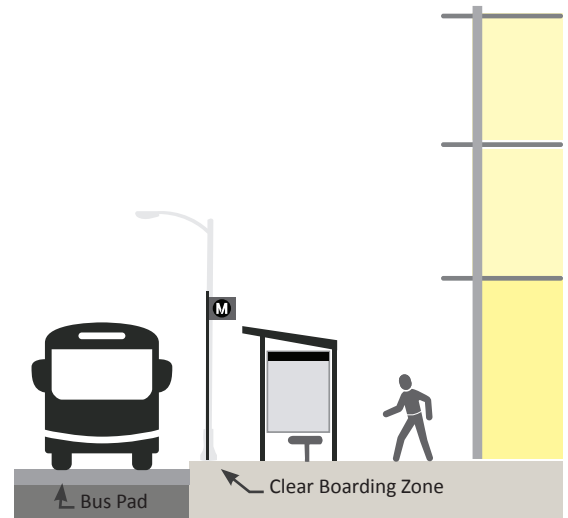
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1.11 Bus Stop & Zones Design

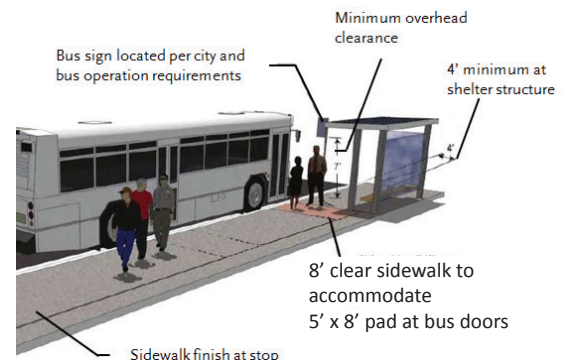
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.



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GORBEL, NEW YORK, U.S.A.
DANGER! DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

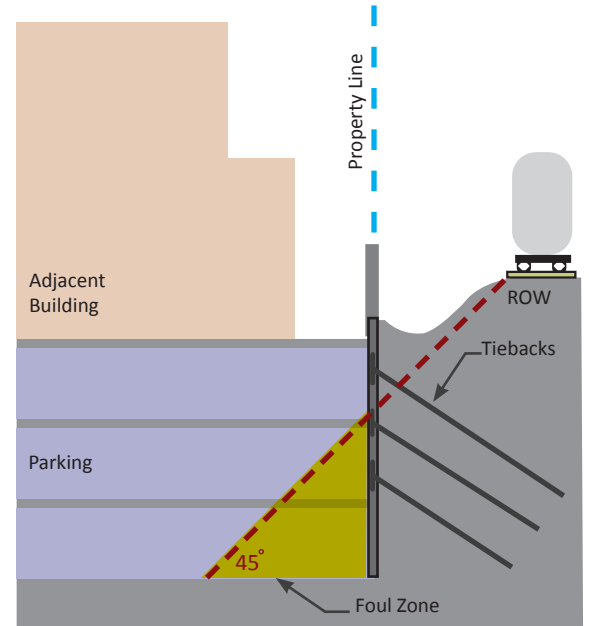
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

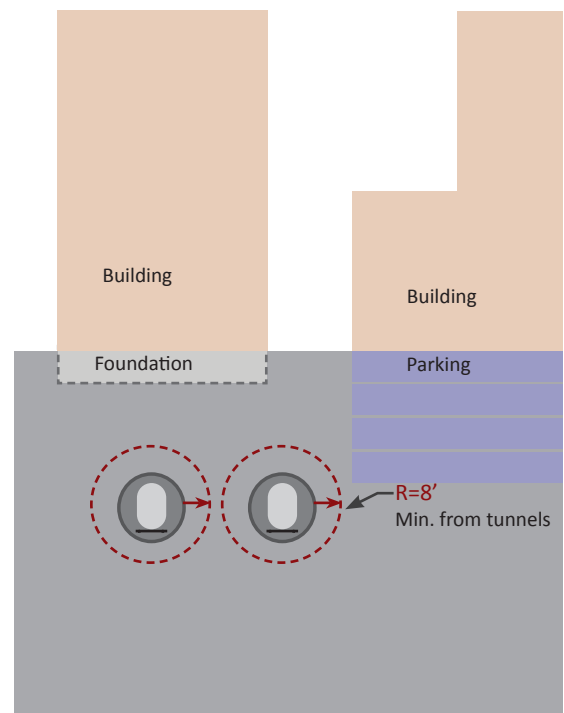
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

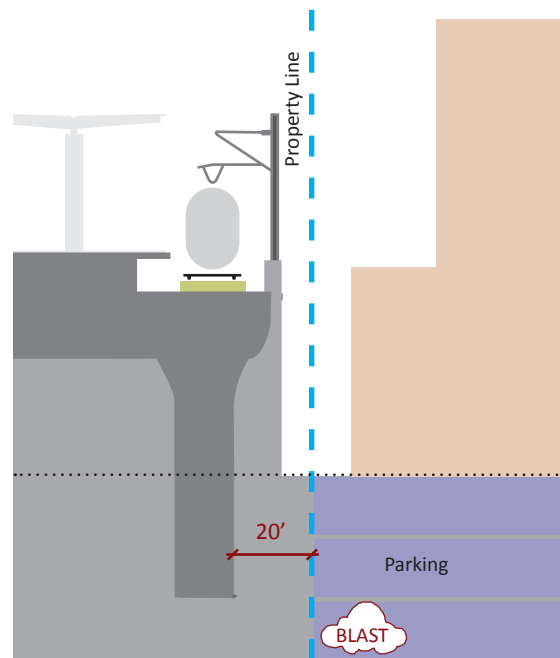


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

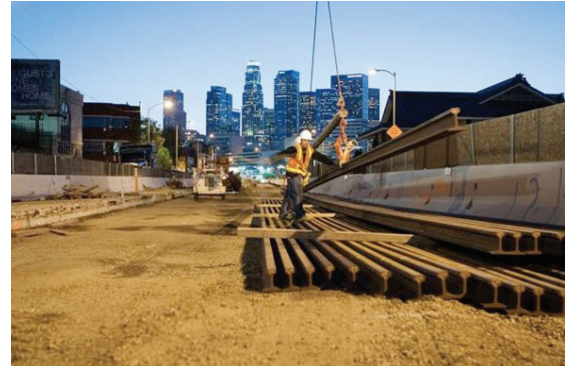
Construction Safety & Management

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.



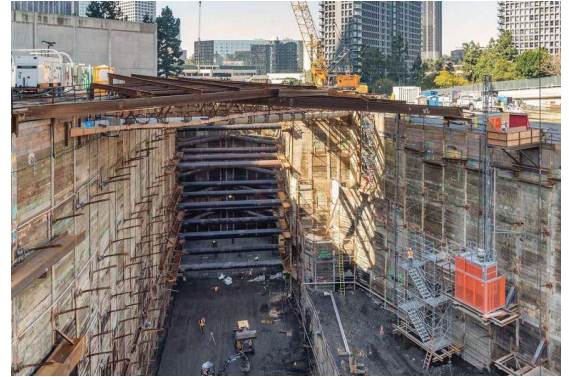
3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

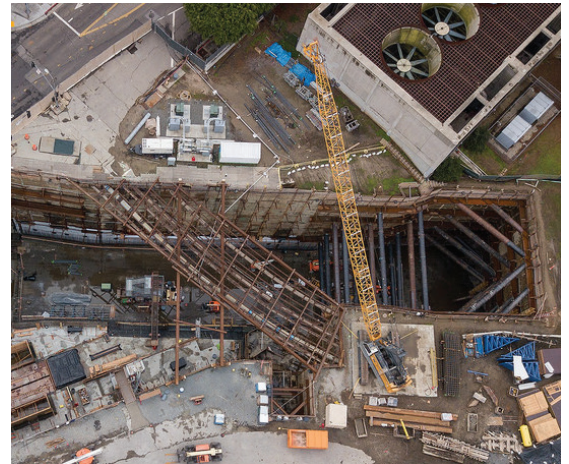
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

Construction Safety & Management

3.5 Crane Operations

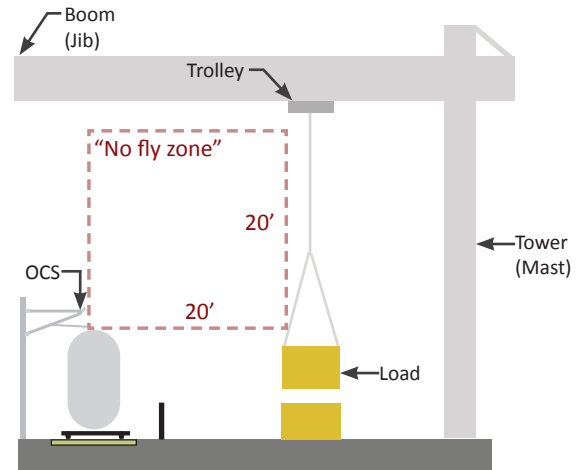
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

RECOMMENDATION:

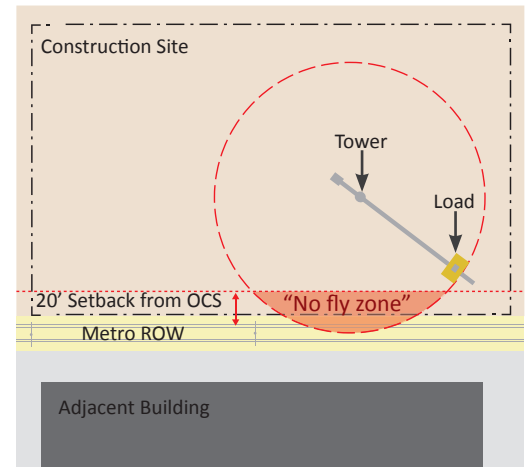
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the "no fly zone" (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

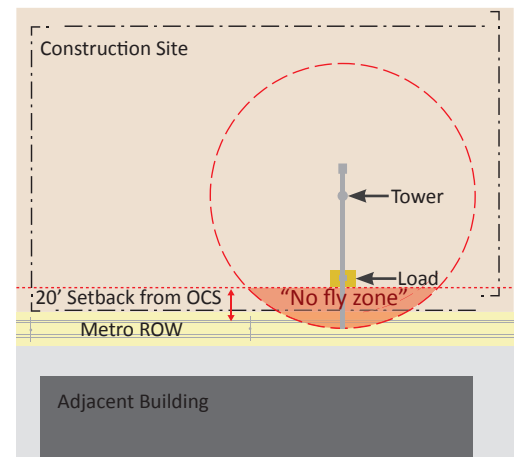
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

Construction Safety & Management

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.



3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

Construction Safety & Management

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down “Utility Project Coordination.”



Coordination of underground utilities is critical to safely and efficiently operate Metro service.



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/



General Plan EIR Comments

Jon Bridgeman <jgbridgeman@gmail.com>

Mon 5/13/2024 5:49 PM

To: O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>

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To Advance Planning, City Council and Planning Chairperson,

I am an environmental consultant who lives in Fox Hills and works across Los Angeles. I understand housing is an issue for all Culver City residents and with that in mind, I want to stress these responses to the General Plan EIR.

Here are my concerns:

Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need to account for the density bonus (doubles the allowed density)

Fox Hills' current buildings are older and either have no capability of adding AC systems or are cost-prohibitive. The current cooling system for Fox Hills relies on natural ocean breeze. In my unit, our windows and sliding doors are open over 12 hours a day, sometimes 24 hours a day to make use of the ocean breeze. It is the most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. There needs to be a study to assess the effect these new developments will have on the ocean breeze by a climate/weather expert. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.

The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 3 to 6 times from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots to build on. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre. (their plan is 75-100 units affordable units of the 1105 they are planning)

Jonathan Bridgeman

4-1

4-2

4-3

4-4

4-5

4-6

4-7

4-8



5/14/24, 8:01 AM

Mail - Reyes, Oscar - Outlook

Fox Hills resident and proponent of more housing for all Culver City

↑
4-8
cont.

General Plan for Fox Hills

Anna Budevka <anna@gointernetstours.com>

Mon 5/13/2024 11:24 AM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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You don't often get email from anna@gointernetstours.com. [Learn why this is important](#)

Dear City council and city staff,

This is a response to the General Plan EIR. Here are our concerns:

- 1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density) 5-1
- 2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. 5-2
- 3. The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills. 5-3
- 4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre. 5-4
- 5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the 5-5

↑
5-5
cont.

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6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

5-6

7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

5-7

8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.

5-8

9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

5-9

Anna Budevskas
Fox Hills resident

Fox Hills General Plan

YK G <ykgould@gmail.com>

Sun 5/12/2024 6:14 AM

To: Culver City Advance Planning Division <advance.planning@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>; McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>

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6-1

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Yihui Gould
Fox Hills resident

↑
6-1
cont.

Hello

Gloria Ko <gloria.ko@gmail.com>

Sun 5/12/2024 7:37 AM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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7-1

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7-1
cont.

Gloria Moritz
Fox Hills resident

Are we against housing in Fox Hills?

No, we understand that we need housing, but we want equitable distribution of housing. One single neighborhood can not be the answer for all Culver City housing.

What is the total number of housing Culver City is requested by the state to create?

3341 units.

How many current proposed projects in Fox Hills?

1705 units (3 projects) + Bristol Plaza, rumor of 1000 units. Total: 2705 units

What is a General Plan?

A general plan is each local government's blueprint for meeting the community's long-term vision for the future. One of the important things that sets is the zoning parameters. The new Culver City General Plan is for the next 20-30 years.

What is the current density for mix use zoning in Fox Hills?

Density Mix use zoning is 35 units/acre.

What is in the General Plan for Fox Hills?

Proposed mix use is 100 units/Acre. About 300% increase in our density.

Is this the maximum number of units they can develop?

No. Developers can obtain a density bonus doubling the number of units. We could have up to 200 units/Acre. 600% increase in our density.

Fox Hills Planning

MELISSA KORC <melissakorc@me.com>

Mon 5/13/2024 2:35 PM

To: Culver City Advance Planning Division <advance.planning@culvercity.org>
Cc: O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>; McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>

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You don't often get email from melissakorc@me.com. [Learn why this is important](#)

To Advance Planning, City Council and Planning Chairperson,

This is a response to the General Plan EIR.

Here are my concerns:

Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need to account for the density bonus (doubles the allowed density)

8-1

The CA law for composting is very difficult to meet in our buildings. Our buildings were built so long ago that we don't have enough space for trash, recycling and organic bins. This requires us to get the small cart which is not ideal in large buildings.

8-2

Our older buildings do not allow for EV charging. We tried adding it our building through a program with SCE. However, we were told it would require a transformer outside and the city denied the request. It makes us homeowners trying to keep our value of condo and help the environment be put in a tough spot. The new buildings would be built this with no consideration for us in older buildings.

8-3

Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. There needs to be a study to assess the effect these new developments will have on the ocean breeze by a climate/weather expert. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

8-4

The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.

8-5

8-5
cont.

The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

8-6

Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 3 to 6 times from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

8-7

Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.

8-8

Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

8-9

We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots to build on. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre. (their plan is 75-100 units affordable units of the 1105 they are planning)

8-10

FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Melissa Korc
Fox Hills resident

Melissa Korc
Sent from my iPhone

Response for General Plan EIR

yumihomes@me.com <yumihomes@me.com>

Mon 5/13/2024 4:41 PM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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You don't often get email from yumihomes@me.com. [Learn why this is important](#)

Dear City council and city staff,

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the

9-1

environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.

Yumi Mandt-Rauch
Fox Hills resident

↑
9-1
cont.

Throwing ALL housing to Fox Hills

Karyn Marks <karynurse@yahoo.com>

Sun 5/12/2024 9:27 AM

To: Culver City Advance Planning Division <advance.planning@culvercity.org>

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To Whom It May Concern,

I know it's easier to just throw all housing to Fox Hills. Fox Hills has ALWAYS been the "Redheaded Stepchild" of Culver City.

When you throw ALL of the housing to our area. You Clearly destroy our quality of life. There is NO WAY the traffic will be acceptable. It is already impossible.

The architects told us to "fight all you want but this is a done deal." They said (and I quote) "The City Council plans to pack Fox Hills with housing."

This is a blatant disregard for all who live here, for all who supported you!

10-1

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.

10-2



5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Karyn Marks
310-892-3977
Fox Hills resident

10-2
cont.

Comments on GENERAL PLAN - Culver City

Gildardo Ramirez Jr. <gilramirezjr80@gmail.com>

Fri 5/24/2024 2:29 PM

To: Culver City Advance Planning Division <advance.planning@culvercity.org>

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You don't often get email from gilramirezjr80@gmail.com. [Learn why this is important](#)

Dear Members of the City Council and Planning Chairperson,

I am writing in response to the concerns raised about the General Plan EIR regarding the proposed zoning density changes in Fox Hills. It's my understanding that I missed the May 13th deadline to submit such comments, but I thought it best to submit them nonetheless. While I understand and appreciate the apprehensions of my fellow residents, I believe there are significant benefits to the proposed plan that warrant consideration. Below, I address the specific concerns highlighted.

11-1

1. **Zoning Density:** The proposed density increase to 100 units/acre with the potential for a density bonus may seem excessive at first glance. However, it is essential to recognize the pressing need for housing in Culver City and the broader region. Higher density zoning can help address the housing shortage, reduce housing costs, and provide more affordable housing options. Moreover, modern urban planning techniques can mitigate the potential negative impacts on infrastructure and quality of life.

11-2

2. **Cooling Systems and Ocean Breeze:** The concern about blocking ocean breezes and increasing temperatures is valid, but it is important to note that new developments can be designed to minimize these effects. Architects and planners can incorporate designs that allow for airflow and utilize advanced cooling technologies that are energy-efficient and environmentally friendly. Additionally, a study by climate and weather experts can be conducted to ensure that new developments do not significantly impact the natural cooling benefits currently enjoyed by residents.

11-3

3. **Environmental Impact:** The Environmental Impact Report (EIR) acknowledges "Unavoidable Significant Impact" in areas such as air quality, noise, and transportation. It is crucial to ensure that the EIR fully accounts for maximum development scenarios, including potential density bonuses. This transparency allows for better planning and the implementation of mitigation strategies to minimize these impacts. However, increased density can also lead to more efficient land use, reducing sprawl and preserving open spaces elsewhere.

11-4

4. **Quality of Life and Community Character:** While concerns about losing Fox Hills's unique character are valid, it is important to recognize that neighborhoods' character naturally evolves over time. Fox Hills has undergone numerous changes over the years, adapting to

11-5

its residents' needs and the broader societal trends. This evolution is a testament to our community's resilience and dynamism.

Historically, Fox Hills has seen various phases of development, from its early days with single-family homes to the introduction of multifamily units and commercial spaces. Each phase brought new amenities, infrastructure improvements, and a broader mix of residents, enhancing the area's vibrancy and economic diversity. This continuous evolution has enriched the community, making it more inclusive and dynamic.

Cities are living entities that must evolve to meet the changing needs of their inhabitants. With the current housing crisis and increasing urban populations, higher-density developments are essential to provide affordable housing, reduce urban sprawl, and promote sustainable living. Thoughtful urban planning can ensure that these developments are integrated seamlessly with the existing environment, preserving the unique character of Fox Hills while accommodating new growth.

Additionally, higher-density housing can bring numerous benefits to the community, such as:

- **Increased Economic Activity:** More residents can support local businesses, leading to a more vibrant local economy.
- **Enhanced Public Amenities:** Higher density can justify the development of better public amenities, including parks, community centers, and public transportation, improving the quality of life for all residents.
- **Sustainability:** Concentrating development within existing urban areas helps preserve open spaces and reduces the environmental impact of suburban sprawl. Modern construction techniques and green building standards can further mitigate environmental concerns.

It is also worth noting that other cities that have embraced higher-density development have successfully maintained their unique character while providing much-needed housing and amenities. Examples from cities like Portland, OR, and Vancouver, BC, demonstrate that with careful planning and community involvement, it is possible to balance growth with preservation.

5. **Development Location and Density Allocation:** The proposal to concentrate higher density north of Slauson and limit density south of Slauson is a reasonable compromise. However, it is essential to balance this with the need for equitable development across the city. Ensuring that new developments include a mix of market-rate and affordable housing is crucial. Incentivizing developers to provide affordable units through density bonuses can be an effective strategy if properly managed.

6. **State Compliance and Developer Incentives:** It is true that state regulations require cities to plan for adequate housing across all income levels. Reducing density too much could jeopardize compliance with these requirements. However, the city has leverage in

11-5 cont

11-6

11-7

11-8

Fox Hills General Plan

Pouran <pourandokht_s@yahoo.com>

Sun 5/12/2024 8:16 PM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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You don't often get email from pourandokht_s@yahoo.com. [Learn why this is important](#)

Dear City council and city staff,

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 300% to 600% from our current density. The entire EIR should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.
6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will be little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because they make enough profit. They may add a

12-1

few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?

- 8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson(65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
- 9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Pouran Saeedi
Fox Hills resident

Sent from my iPhone

↑
12-1
cont.

COMMENTS TO BE ADDRESSED RE: THE EIR FOR THE CULVER CITY DRAFT GENERAL PLAN:

Per the Advance Planning Division, the 100 units/acre density designation was not put on the north side of Slauson , which presently has no housing and far less traffic than the south side of Slauson, because of **developer preference for larger parcels**, thus the south side of Slauson is presently designated for 100 units/acre under the city’s Draft GP. This decision resulted in thus far, 3 developers, proposing a total of 1706 units with most likely more proposals to be submitted to include a probable large development in the former site of CVS on Bristol Parkway, adding most likely another proposed 700 to 1000 units. All these proposals are concentrated on the south side of Hannum, which is even a smaller area of concentration than just the south side of Slauson. Presently all of the 2800 units in 26 complexes in Fox Hills, located south of Hannum, make it the densest housing area in Culver City.

13-1

According to the results of the EIR, there will be a potential for **Unavoidable Significant Impact** on several areas to include air quality, noise and transportation. Based on the above results of the EIR, please clarify, if the same significant impact on air quality would occur with development of 100 units per acre as with 50 units per acre? Or, let's say, that a bulk of the units would be on the north side of Slauson. Would that also produce the same unavoidable impact on air quality for the south side of Slauson, where all the building is being proposed now? Please be specific with documented proof.

13-2

As verified by the Advance Planning manager, the reason that the 100 unit/acre designation was not placed on the north side of Slauson in Fox Hills is developer preference for larger parcels and that he said that was the only reason he could think of. The Community Development Director stated: **“An EIR requires the study of a reduced density alternative. As there is already a designation of 65 units/acre, 80 units/acre was selected as there needs to be a significant difference between existing densities (in this case, between 65 and 100). ESA, in conjunction with City staff, developed that option.”** This response was emailed to me when I wrote: **“We know about the housing element and that if the land use element is changed to decrease density designation in certain areas it would have to be done by City Council. The "option" of 80 units/acre, as you know, would not significantly decrease the density south of Slauson and is not a serious option at all.”**

13-3

You must give a logical explanation (not developer preference) as to why the 100 units/acre designation will not be changed to the north side of Slauson in Fox Hills. Then, the lower density could go on the south side of Slauson. If the city was really concerned about air quality and its impact on citizens, tell us why it is not being done. 50 units/acre would be most desirable, as we know now that the developers can get their density doubled anyway.

13-4

Presently, the residents in Fox Hills have natural breeze to cool their units and the present infrastructure have either no capacity for air conditioning or only for portable air conditioning. Given the air blockage that will occur with these new developments, reaching 7 stories high, this will affect residents tremendously. When I asked how the city is addressing this issue, I received the following comment from Advance Planning: **““CEQA Guidelines do not provide a threshold pertinent to ocean breezes.**

13-5



The City anticipates that given the topography as well as the setbacks and articulation required in the Zoning Code Update standards, that breezes would not be obstructed.” Documented scientific proof from a weather/climate expert is needed and not a general statement. Please address responsibly.

Thank you.

Judi Sherman

On the board of the Fox Hills Neighborhood Association

Resident of Fox Hills

↑
13-5
cont.

Per the Advance Planning Division:

As stated in the draft EIR, Since “CEQA Guidelines do not provide a threshold pertinent to ocean breezes” The City anticipates that given the topography as well as the setbacks and articulation required in the Zoning Code Update standards, that breezes would not be obstructed.”

FW: EIR for General Plan

Evangelho, Troy <Troy.Evangelho@culvercity.org>

Tue 4/23/2024 4:40 PM

To: Reyes, Oscar <Oscar.Reyes-Zapien@culvercity.org>

Hi Oscar,

Please include this in the EIR comments.

Thank you,

Troy Evangelho, AICP

Advance Planning Manager

Culver City, Planning and Development

9770 Culver Boulevard, Culver City, CA 90232

(310) 253-5744 / Troy.Evangelho@CulverCity.org

From: Fox Hills Neighborhood Association <yourfoxhills@fnacc.org>

Sent: Thursday, April 18, 2024 7:02 PM

To: Evangelho, Troy <Troy.Evangelho@culvercity.org>

Subject: Re: EIR for General Plan

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Good evening Troy,

Thanks, as always for your responses.

I was under the impression that ESA did the report and they identified the significant impact problems and not the city. Is that correct?

To clarify, for example, the same significant impact on air quality would occur with development of 100 units per acre as with 50 units per acre? FYI: South of Hannum , the tally is up to 1709 units of mixed-use development with more than likely, another 1000 units to be proposed at the Fox Hills Plaza site, which would total 2700 units. Or, let's say, that a bulk of the units would be on the north side of Slauson. Would that also produce the same unavoidable impact on air quality for the south side of Slauson, where all the building is being proposed now?

13A-1

Also, who in "The City" determined the conclusions regarding the ocean breeze? Were they climate scientists or someone with expertise in the field of weather/climate? Please let us know who actually showed documented proof that ocean breezes would not be obstructed by the magnitude of development proposed in Fox Hills on the south side of Slauson.

13A-2

Thanks once again for your clarifications and look forward to your responses.

Judi

From: Evangelho, Troy <Troy.Evangelho@culvercity.org>

Sent: Wednesday, April 17, 2024 10:47 AM

To: Fox Hills Neighborhood Association <yourfoxhills@fnacc.org>

Subject: RE: EIR for General Plan

Hi Judi,

You are correct that the City has identified a number of topics that will potentially create a significant unavoidable impact. For next steps there are several options. The City could choose to make a "statement of overriding consideration" where it acknowledges the impacts, but chooses to continue with the project as proposed regardless. Another option would be to choose a less impactful or scaled down option. However, I believe even the less impactful options create potential significant unavoidable impacts.

Regarding ocean breezes, the City does not anticipate making any changes. As stated in the draft EIR, "CEQA Guidelines do not provide a threshold pertinent to ocean breezes. The City anticipates that given the topography as well as the setbacks and articulation required in the Zoning Code Update standards, that breezes would not be obstructed."

Regards,

Troy Evangelho, AICP

Advance Planning Manager

Culver City, Planning and Development

9770 Culver Boulevard, Culver City, CA 90232

(310) 253-5744 / Troy.Evangelho@CulverCity.org

From: Fox Hills Neighborhood Association <yourfoxhills@fnacc.org>

Sent: Wednesday, April 10, 2024 7:16 PM

To: Evangelho, Troy <Troy.Evangelho@culvercity.org>

Subject: Re: EIR for General Plan

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Thank you again Troy.

So, at this point with air quality, noise, and the other items that have been analyzed by ESA as having significant impact that is unavoidable, what is the city obligated to do regarding these problem areas.

I realize that ESA listed the ocean breeze issue as a concern, so how is the city planning to address this issue? Actually that is the question I meant to ask.

Thanks

Judi

From: Evangelho, Troy <Troy.Evangelho@culvercity.org>

Sent: Wednesday, April 10, 2024 5:09 PM

To: Fox Hills Neighborhood Association <yourfoxhills@fnacc.org>

Subject: RE: EIR for General Plan

Hi Judi,

13A-3

Yes there is references and discussion of ocean breezes.

Pg. 14 - Issues raised during notice of preparation process and areas of controversy
Pg. 100 – Aesthetics, listed under the “other” category

Regards,

Troy Evangelho, AICP

Advance Planning Manager
Culver City, Planning and Development
9770 Culver Boulevard, Culver City, CA 90232
(310) 253-5744 / Troy.Evangelho@CulverCity.org

From: Fox Hills Neighborhood Association <yourfoxhills@fhna.org>
Sent: Tuesday, April 9, 2024 11:35 AM
To: Evangelho, Troy <Troy.Evangelho@culvercity.org>
Subject: Re: EIR for General Plan

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Good morning, Troy,

As always, thanks so much for your responses.
The blockage of ocean breeze due to the proposed housing projects and its effect on climate control in Fox Hills was included in the comments as a problem (Appendix 3). Is that issue addressed anywhere by the ESA in the EIR? I believe that was not covered in the EIR although maybe I missed it.

13A-4

Again, thanks for all your responses.

Judi

From: Evangelho, Troy <Troy.Evangelho@culvercity.org>
Sent: Tuesday, April 9, 2024 8:43 AM
To: Fox Hills Neighborhood Association <yourfoxhills@fhna.org>
Subject: RE: EIR for General Plan

Hi Judi,

See my responses to your questions below in red.

Troy Evangelho, AICP

Advance Planning Manager

Culver City, Planning and Development

9770 Culver Boulevard, Culver City, CA 90232

(310) 253-5744 / Troy.Evangelho@CulverCity.org

From: Fox Hills Neighborhood Association <yourfoxhills@fhnacc.org>
Sent: Monday, April 8, 2024 12:48 PM
To: Evangelho, Troy <Troy.Evangelho@culvercity.org>
Subject: EIR for General Plan
Importance: Low

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Good afternoon, Troy,

I hope you had a good weekend and got a chance to see the eclipse today.

Can you please verify that I am interpreting the analysis correctly re: **Air Quality and Noise sections** of the EIR as follows?

When the report is explaining that there is unavoidable significant impact regarding the air quality and noise , I assume they mean to be addressing the General Plan as it is presently. Is that correct? **Yes, the analysis is for the "project", which is the General Plan as proposed.**

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Then, when they go on to say that any mitigating strategies would not reduce the significant impact on air quality and noise, I am again assuming they mean that as the GP is now, nothing would really result in any improvement in air quality or noise abatement. Is that correct? **Correct, as proposed the project would have potentially significant unavoidable impacts to air quality, noise, transportation, and cultural resources.**

Lastly, the section in the Executive Summary regarding "**Issues raised during the preparation process and areas of controversy**" there is a statement that these issues would be addressed later on. When will that be, if you have any idea of that timeline? **I couldn't find any references to issues**

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that will be addressed later. This EIR covers a wide range of all environmental factors, including all those required by CEQA.

As always, your feedback is greatly appreciated.

Sincerely,

Judi

Fox Hills Neighborhood Association

Judi Sherman, President

Paula Keating, Treasurer



www.fhnacc.org

YourFoxHills@fhnacc.org

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Response to General Plan

Sequoia Tully <sequoiatully@gmail.com>

Sun 5/12/2024 1:03 AM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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Dear City Council,

I have concerns regarding the General Plan EIR.

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need to account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All of the new development is in the west or south west of existing buildings and has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
3. The EIR shows "Unavoidable Significant Impact"(air quality, noise, transportation). Question: Is this study accounting for a fully developed new density Fox Hills? Is this study accounting for max density bonus? If not, the city of Culver City MUST do a new study w/ 100 units/acre and 200 units/acre fully developed Fox Hills.
4. The reason we are demanding the 200 units/acre scenario is because the density bonus can not be denied by the city. Is that correct? If this is correct, the worst case scenario is 200 units/acre.
5. Looking at the new density map proposed by the new General Plan, the Fox Hills area is the neighborhood with the largest density proposal than any other area in Culver City. That gives the Fox Hills resident the right to know what is the consequence of the city's decision to up our density 300% to 600% from our current density. The entire EIR

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should use the fully developed Fox Hills with 100 units/acre and 200 units/acre for all the environmental impact, such as air quality, noise, traffic, street parking, ocean breeze, basic infrastructure (sewer, water, electricity,...), city services, schools, etc). In summary, our quality of life.

6. Fox Hills has 2 areas: north of Slauson and south of Slauson. South of Slauson is where the current residents are. We propose that the high density of 100 units/acre be North of Slauson ONLY, where it will have little affect to current residents. South of Slauson should be no more than 50 units/acre, so with the density bonus it could be up to 100 units/acre.
7. Why change the South of Slauson density to 50 units/acre? 100 units/acre gives no incentive for the developers to add affordable housing because of profit. They may add a few affordable housing but not enough. Also, the city is losing all the leverage to incentivise the developers to give us more affordable housing. It makes no sense to make a general plan that caters to what the developer wants. Is the General Plan made for the Culver City residents or for the developers?
8. We asked the top city planning person the reason why we could not switch the high density (100 units/acre) to North of Slauson (65 units/acre proposal) and make south of Slauson 65 units/acre? His answer: because the developers like big lots with high density. Look at the current 5757 Uplander project. The developers are not using much of the density bonus because they do not need it. They make profit w/ the 100 units/acre.
9. FYI: Keep in mind developers may say that the city will be out of compliance with the state if the density designations are lowered on the south side of Slauson, which is inaccurate, as clarified by the Advance Planning Division when the Fox Hills Neighborhood Association asked about it.

Sequoia Tully
Fox Hills resident

14-1
cont.

Concern

Louise Wechsler <louiseaw77@aol.com>

Tue 5/7/2024 10:56 AM

To: Culver City Advance Planning Division <advance.planning@culvercity.org>

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To whom it may concern:

I am a 16 year resident of Fox Hills and condo owner who is opposed to the proposed housing developments planned for our neighborhood. We already have one of the densest housing areas in Culver City. The proposed new housing will only add to our traffic and noise issues. Please reconsider, and move the proposed new housing (which certainly is needed) to the northern side of Slauson, which lacks residential buildings.

Thank you,

Louise Wechsler

6150 Buckingham Pkwy#301

Culver City 90230

Sent from my iPad

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General Plan EIR

Jeff Willis <jeffwillis310@gmail.com>

Sun 5/12/2024 9:04 PM

To:McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>;O'Brien, Dan <Dan.O'Brien@culvercity.org>;Puza, Freddy <Freddy.Puza@culvercity.org>;Vera, Albert <Albert.Vera@culvercity.org>;Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>;Jones, Stephen <stephen.jones@culvercity.org>

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Dear City Council and City Staff,

This is a response to the General Plan EIR. Here are our concerns:

1. Fox Hills new zoning density is too high. We are already the most dense area in Culver City. The General Plan should cut the density to 50 units/acre, because we need account for the density bonus (doubles the allowed density)
2. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the new General Plan. We need to know what happens to our ocean breeze if the entire new mix use zoning is fully developed at 100 unit/acre and another one with 200 units/acre (since this is a possibility w/ the max density bonus). The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.
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16-1

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Jeff Willis
Fox Hills Property Owner
Culver City Resident

16-1
cont.

