

Appendix A
**Notice of Preparation (NOP),
Initial Study, Scoping Meeting
Materials, and Comments on
the NOP**



Appendix A-1
Notice of Preparation



Culver CITY

CURRENT PLANNING DIVISION

(310) 253-5710

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253-5721

MICHAEL ALLEN

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

Current Planning Manager

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND COMMUNITY MEETING/EIR SCOPING MEETING

11111 JEFFERSON BOULEVARD MIXED-USE PROJECT

NOTICE IS HEREBY GIVEN to all responsible agencies and interested parties that the City of Culver City (City), as the Lead Agency, will be preparing an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082. This Notice of Preparation (NOP) has been prepared to describe the Project and identify the scope of environmental issues recommended to be addressed in the EIR, and to seek your comments on what environmental effects and alternatives the EIR should study. You are being notified of the City's intent, as Lead Agency, to prepare an EIR for this Project, as it is located in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by consultants under direction of the City and submitted to the Planning Division for independent review and certification.

PROJECT TITLE: 11111 Jefferson Boulevard Mixed-Use Project

APPLICANT/OWNER: Jefferson Park LLC

PROJECT ADDRESS: 11111 Jefferson Boulevard, Culver City, CA 90230

DUE DATE FOR PUBLIC COMMENTS ON THE NOP: 5:30 P.M. on Friday, October 16, 2020

COMMUNITY MEETING/EIR SCOPING MEETING: 6:00 P.M.–8:00 P.M. on Tuesday, October 6, 2020

PROJECT LOCATION: The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230. See attached figure.

PROJECT DESCRIPTION: The 3.43-acre (149,553 square feet [sf]) Project Site, is located in the Studio Village neighborhood and is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct up to 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of up to 244,609 sf of residential area including the residential lobby and amenity room); up to 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants, and a 1,950 sf gym; and up to 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). Vehicular access to the Project Site would be provided from three driveways: one on Sepulveda Boulevard at Janisann Avenue and two on Machado Road. The driveway on Sepulveda Boulevard and the east driveway on Machado Road (closer to Jefferson Boulevard) would serve retail, market, and office uses. The west driveway on Machado Road opposite Heritage Place would provide access for resident and resident guest parking, and for ECF parking all located below grade. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard. The Project also includes private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard, a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard, and an open air courtyard at the third level of the development to serve the residential units. Project construction would occur in one phase and is anticipated to commence as early as the second quarter of 2022 and be completed by the third quarter of 2024 for a total of approximately 26 months.

ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIR: The Culver City Current Planning Division has determined based on an Initial Study that an EIR will be required to analyze the environmental effects of the proposed Project. Environmental issues identified as having the potential to result in significant impacts that require further evaluation in the EIR include: Air Quality, Cultural Resources, Energy, Geology and Soils (Paleontological Resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise, Population and Housing, Public Services (Fire and Police Protection), Transportation, and Tribal Cultural Resources. The Initial Study is available for review on the Culver City Planning Division website (<https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects>), or City Hall at the Current Planning Division counter, and the Culver City Julian Dixon Library.

PUBLIC COMMENT PERIOD FOR NOP: The Current Planning Division welcomes and will consider all comments regarding the potential environmental impacts of the Project and issues and alternatives to be addressed in the EIR. All comments will be considered in preparation of the EIR. The comment period for the NOP begins on **Thursday, September 17, 2020 and ends on Monday, October 19, 2020**. Written comments should be received on or before **Monday, October 19, 2020 at 5:30 P.M.** Written comments should refer to the Project by name and be addressed to:

Michael Allen, Current Planning Manager
City of Culver City Current Planning Division
9770 Culver Boulevard, Culver City, CA 90232
Phone: (310) 253-5727 Email: Michael.Allen@culvercity.org

COMMUNITY MEETING/EIR SCOPING MEETING: A virtual Community Meeting and EIR Scoping Meeting will be held on **Tuesday, October 6, 2020**. In accordance with the City of Culver City Community Meeting Guidelines, the purpose of the 2nd Official Community Meeting (rescheduled from March 12, 2020 due to COVID-19 emergency orders) is for the Applicant to present the Project, solicit the community's comments on the Project, and receive feedback on the Project prior to submitting entitlement applications to the City. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meetings will be held in an online format using Zoom to share information regarding the Project and the environmental review process. You may join, view, and participate in the meeting by using the Zoom application, by your web browser, or by phone. Register for the virtual meeting by visiting: <http://bit.ly/11111JeffersonBlvdPublicMeeting>. This will provide you with a confirmation and join link, as well as call-in numbers. City staff, environmental consultants, and Project representatives will be available during these meetings, with the Community Meeting being held first, followed by the EIR Scoping Meeting. Each meeting will each begin with a presentation and be followed by a question and answer session. The meetings will be open to the public and all stakeholders. Questions may be submitted via email in advance of the meeting at Michael.allen@culvercity.org, however there will also be opportunities for verbal questions taken at the meetings. A separate more detailed instructions page is included in this communication.

The Community Meeting will begin at 6:00 P.M. and end at approximately 7:00 P.M. and will be followed by the EIR Scoping Meeting at approximately 7:00 P.M. to 8:00 P.M.

Copies of the documentation can be reviewed online using the above link, or by requesting copies from the Current Planning Division Office, City Hall, Second Floor, 9770 Culver Boulevard, Culver City, CA 90232-0507 (handicapped accessible location). City Hall business hours are 7:30 A.M. – 5:30 P.M., Monday through Friday, except alternate Fridays. Please telephone in advance to assure staff availability at (310) 253-5710.

Michael Allen
Michael Allen, Planning Manager

September 17, 2020
Date



SOURCE: Mapbox, 2019.

11111 Jefferson Boulevard Mixed-Use Project

Regional and Site Location Map



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11111 Jefferson Boulevard Community Meeting/EIR Scoping Meeting

Virtual Meeting Instructions

A virtual Community Meeting/EIR Scoping Meeting will be held on the proposed Project and the scope of environmental documentation on **Tuesday, October 6, 2020**. In accordance with the City of Culver City Community Meeting Guidelines, the purpose of the 2nd Official Community Meeting (rescheduled from March 12, 2020 due to COVID-19 emergency orders) is for the Applicant to present the Project, solicit the community's comments on the Project, and receive feedback on the Project prior to submitting entitlement applications to the City. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meetings will be held in an online format using Zoom to share information regarding the Project and the environmental review process. City staff, environmental consultants, and project representatives will be available during these meetings, which will each begin with a presentation and be followed by a question and answer session. The meetings will be open to the public and all stakeholders. **Questions may be submitted via email in advance of the meeting at Michael.allen@culvercity.org, however there will also be opportunities for verbal questions.**

The Community Meeting will be from 6:00–7:00 PM and will be followed by the Scoping Meeting between approximately 7:00–8:00 PM.

How to Participate

Joining, viewing and participating in the virtual meeting can be done a few different ways. Below are instructions on joining using the Zoom application, by your web browser or by phone. Instructions about providing oral comment during the meeting, as well as how to receive tech support prior to and during the virtual meeting, are also outlined.

Register for the virtual meeting through Zoom by visiting: bit.ly/11111JeffersonBlvdPublicMeeting. This will provide you with a confirmation and join link as well as call-in numbers.

Joining the Community/EIR Scoping Meeting

Zoom Application (Preferred Method)

- For the best experience we recommend downloading and installing Zoom on your computer before the meeting begins. You can download the Zoom software in advance or at the moment you join the meeting for free at <https://zoom.us/download>.

Zoom Through Web Browser

- You do NOT need to install Zoom software on your computer to participate and provide comments. When you click on the meeting link provided at registration a new browser tab or window will open (depending on your browser settings). To join the meeting, click the link near the bottom of the window that states “start from your browser”. We recommend Google Chrome, Safari or Firefox.

Join by Phone

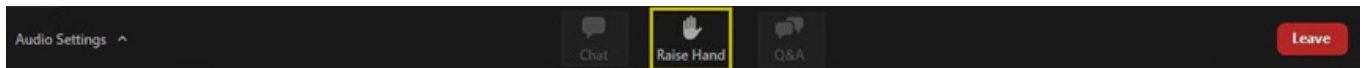
- **Dial:** (877) 853-5247
- **Webinar ID:** 835 7553 2747
- **Phone Shortcuts:**
 - *6 to mute and unmute yourself
 - *9 to raise your hand
- Note: if you are calling into the meeting you will not be able to see the visual content presented, but you can listen and participate. Copies of the presentation will be provided on the City's website after the meetings.

Providing Oral Comments

As you enter the Zoom meeting you will be automatically put on mute. To speak during the session, you will need to virtually raise your hand and a moderator will unmute you. Here's how to raise your hand and speak during the meeting:

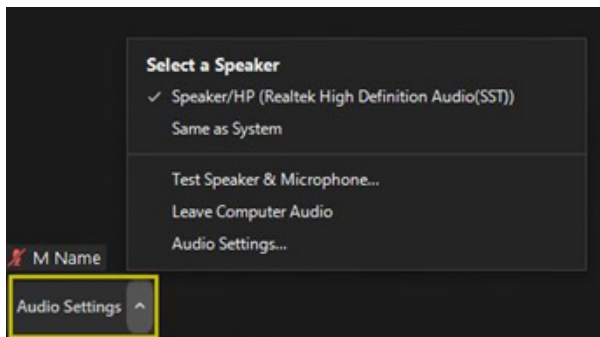
1. Mouse over the bottom of the **Zoom** application and locate the **hand icon**.
2. Select the **hand icon** to virtually raise your hand or **dial *9** if you are joining by phone.
3. A moderator will call your name and unmute you to speak.

Once you have been called on your hand will be lowered and if you would like to speak again you will need to press the **hand icon or press *9** to be placed back in the queue.



Audio Check

You are encouraged to test your audio connection prior to joining the meetings. Click the “Audio Settings” on the lower left and make sure the microphone and speaker are assigned to the correct device. You also can do your audio check while you are waiting for the meeting to start.



Tech Support

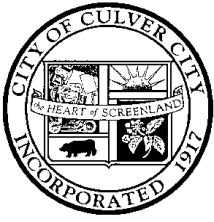
To provide a seamless experience for all users there will be tech support prior to the virtual meetings as well as during. If you are having issues before and would like assistance, please contact **meetingsupport@esassoc.com**.

During the virtual meetings there will be support on hand to assist in a technical issues that may arise. To contact support during the meetings you can utilize the chat function and message to the support team where someone will contact you separately to resolve the issue.



Appendix A-2

Initial Study



Culver CITY

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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY

Project Title: 11111 Jefferson Boulevard Mixed-Use Project

Preliminary Project Review Number: PPR P2019-0242

Project Location: The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230.

Project Sponsor: Jefferson Park LLC

Project Description: The 3.43-acre (149,553 square feet [sf]) Project Site, is located at the southern corner of the Studio Village neighborhood of Culver City (City). The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of 244,609 sf of residential area (including the residential lobby and amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an open air courtyard located at the third level of the development to serve the residential units.

Environmental Determination: This is to advise that the City of Culver City, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this INITIAL STUDY based on the following finding:

- The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- The Initial Study identified potentially significant effects, and an ENVIRONMENTAL IMPACT REPORT is required.

A copy of the Initial Study and any other material which constitute the record of proceedings upon which the City based its decision may be obtained at:

**City of Culver City, Planning Division,
9770 Culver Boulevard, Culver City, CA 90232**

www.culvercity.org

Contact: **Michael Allen, Planning Manager, City of Culver City Planning Division
9770 Culver Blvd, Culver City, CA 90232
(310) 253-5755 (Tel); (310) 253-5721 (Fax)**

The public is invited to comment on the INITIAL STUDY during the review period, which ends **October 16, 2020, at 5:30 P.M.**

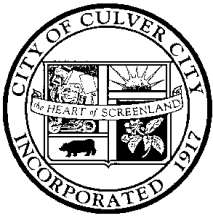


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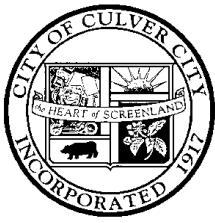
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Culver CITY

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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	11111 Jefferson Boulevard Mixed-Use Project		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person & Phone No.:	Michael Allen, Planning Manager (310) 253-5755 (Tel); (310) 253-5721 (Fax)		
Project Location/Address:	The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230.		
Nearest Cross Street:	Jefferson Boulevard and Sepulveda Boulevard	APN:	4215-001-010 4215-001-013 4215-001-016 4215-001-020
Project Sponsor's Name & Address:	Jefferson Park LLC 151 N. Franklin, Suite 300 Chicago, IL 60606		
General Plan Designation:	General Corridor Commercial	Zoning:	Commercial General (CG) and Single-Family (R-1)
Overlay Zone/Special District:	Not Applicable		
Project Description and Requested Action: The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of 244,609 sf of residential area including the residential lobby and amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an open air courtyard with residential amenities located at the third level of the development to serve the residential units. Requested entitlements would include: General Plan Amendment; Zoning Code/Map Amendment; Adoption of a Comprehensive Plan for the Project, which would establish the development standards for the Project Site; Community Benefits Request; Density Bonus Request; Vesting Tentative Tact Map; Certification of the EIR; Demolition Permits to remove the existing on-site structures to allow for construction of the Project; Construction Permits, including building, grading, excavation, foundation, and associated permits; Haul Route Permit, as may be required by Culver City; and other discretionary and ministerial approvals as needed and as may be required. Please refer to Attachment A, Project Description, for a detailed discussion of the proposed Project.			

Existing Conditions of the Project Site: The Project Site includes four parcels from north to south. The northernmost parcel (APN 4215-001-020) consists of a surface parking lot with 34 parking spaces used by ECF as off-site parking. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces. The northern central parcel (APN 4215-001-016) is occupied by a United States Post Office (27,225 sf) built in the early 1960s. The next parcel to the south (APN 4215-001-010) is occupied by Coco's Casual Restaurant chain (6,064 sf) built in the late 1960s. The southernmost parcel (APN (4215-001-013) is occupied by Valvoline Instant Oil Change (1,722 sf) built in the 1990s.

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

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

Other public agencies whose approval may be required: *(e.g., permits, financing approval, or participation agreement)*

- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District
- Other agencies as needed.

Consultation with California Native American tribes: *(Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?)*

The City will comply with applicable requirements regarding consultation with California Native American tribes.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages:

- | | |
|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Geology /Soils | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Land Use / Planning | |

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Michael Allen
Planning Manager, City of Culver City

September 15, 2020

Date

PURPOSE OF THE INITIAL STUDY

The project is analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the City of Culver City. The City of Culver City is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project.

EVALUATION OF ENVIRONMENTAL IMPACTS:

The impact columns heading definitions in the table below are as follows:

- “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- “Less than Significant Impact with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.
- “Less than Significant Impact” applies where the project creates no significant impacts, only Less Than Significant impacts. An impact may be considered “less than significant” if “project design features” would be implemented by the project or if compliance with applicable regulatory requirements or standard conditions of approval would ensure impacts are less than significant.
- “No Impact” applies where a project does not create an impact in that category. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project would not displace existing residences). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to toxic pollutants, based on a project-specific screening analysis).

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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I. AESTHETICS – Except as provided in Public Resource Code Section 21099, would the Project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the Project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES – Would the Project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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V. CULTURAL RESOURCES – Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VI. ENERGY – Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VII. GEOLOGY AND SOILS – Would the Project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS – Would the Project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

X. HYDROLOGY AND WATER QUALITY – Would the Project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XI. LAND USE AND PLANNING – Would the Project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XII. MINERAL RESOURCES – Would the Project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIII. NOISE – Would the Project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING – Would the Project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XV. PUBLIC SERVICES

a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVI. RECREATION

a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVII. TRANSPORTATION – Would the Project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES

- a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

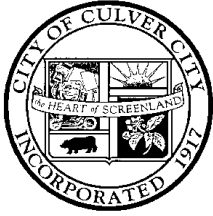
XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?
- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

Jefferson Park LLC, the Applicant, proposes to develop a mixed-use residential and commercial project (Project) on an approximately 3.43-acre (149,553 square feet [sf]) triangular shaped site (Project Site) located in the City of Culver City (Culver City or City). The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west. The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable targeted to very low income households, for a total of 244,609 sf of residential area (including the residential lobby and residential amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an internal, open air courtyard with residential amenities located at the third level of the development to serve the residential units.

B. PROJECT LOCATION AND SURROUNDING USES

The Project Site is located in the Studio Village neighborhood in the southern part of Culver City. The Project Site is surrounded by the Sunkist Park neighborhood to the west and southwest, the Heritage Park and Lindberg Park neighborhoods to the north, the Studio Village Shopping Center to the east, and the Blanco Park neighborhood to the southeast. Primary regional access is provided by the San Diego Freeway (I-405) and the Marina Freeway/Expressway (SR-90), both located approximately 0.7 miles southwest of the Project Site. See **Figure A-1**, *Regional and Site Location Map*, for the location of the Project Site. See **Figure A-2**, *Aerial Photograph of the Project Site and Vicinity*, for an aerial image of the Project Site and surrounding development. As described in Section E.3, below, the Project Site is also served by multiple regional and local bus lines that run along Sepulveda and Jefferson Boulevards.

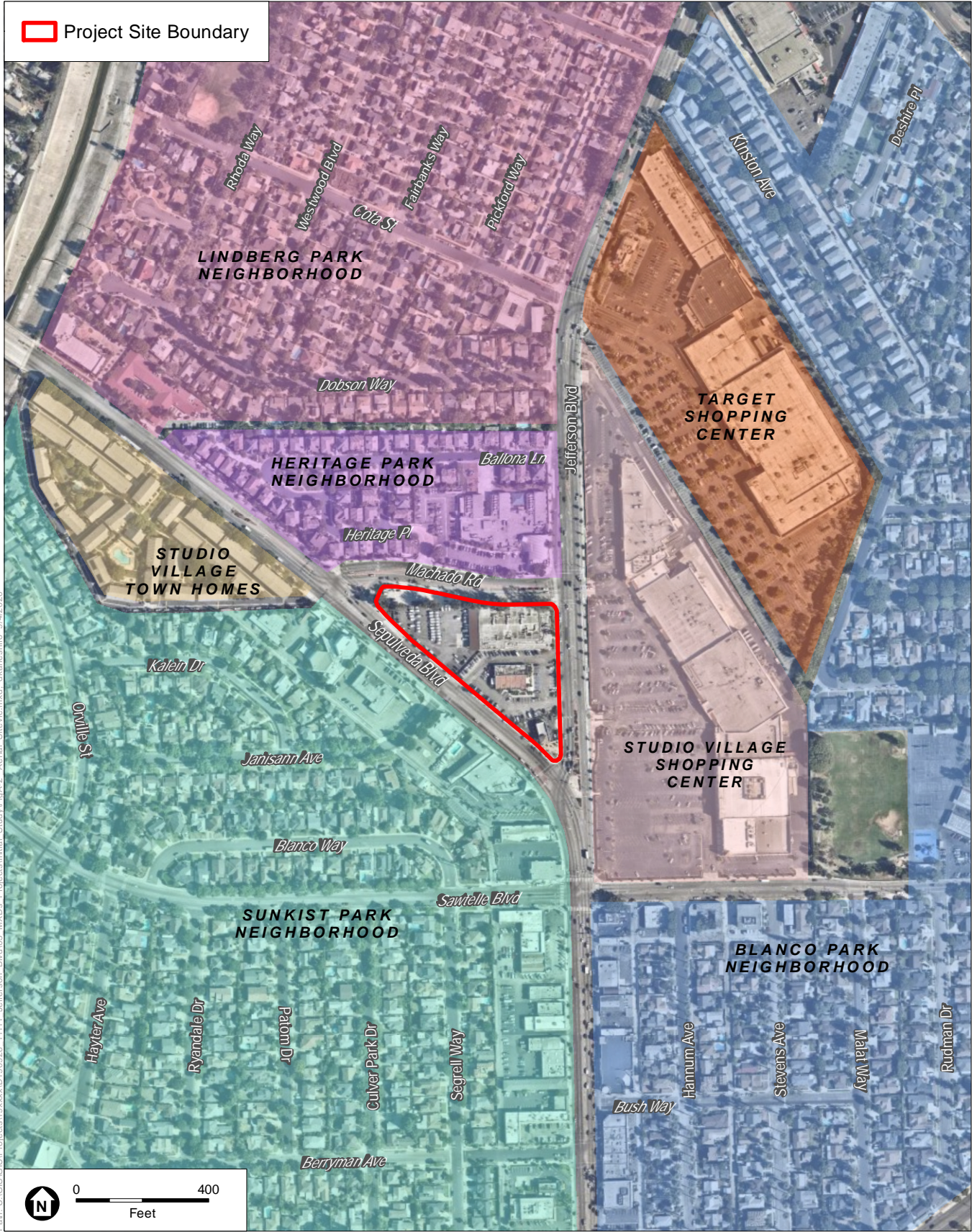


SOURCE: Mapbox, 2019.

11111 Jefferson Boulevard Mixed-Use Project

Figure A-1
Regional and Site Location Map





SOURCE: Mapbox, 2019.

11111 Jefferson Boulevard Mixed-Use Project

Figure A-2
Aerial Photograph of the Project Site and Vicinity



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

C. EXISTING CONDITIONS

The Project Site is relatively flat with elevations ranging from approximately 33 to 35 feet. The Project Site includes four parcels from north to south. The northernmost parcel (APN 4215-001-020) consists of a surface parking lot with 34 parking spaces used by ECF as off-site parking. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces. The northern central parcel (APN 4215-001-016) is occupied by a United States Post Office (27,225 sf) built in the early 1960s. The next parcel to the south (APN 4215-001-010) is occupied by Coco's Casual Restaurant chain (6,064 sf) built in the late 1960s. The southernmost parcel (APN (4215-001-013) is occupied by Valvoline Instant Oil Change (1,722 sf) built in the 1990s.

In addition to the existing buildings and areas of surface parking, there is a mix of ornamental landscaping on the Project Site, including a number of mature eucalyptus and palm trees, with the most concentrated plantings along Machado Road. At the southern end of the Project Site there is a sparsely landscaped open space area with decomposed granite and a decorative fountain. There are also street trees along all three frontages of the Project Site and within the Machado Road landscaped median. In certain areas along the perimeter of the Project Site, there are block walls, chain link fencing and wrought iron fencing. There is monument and other signage for the Coco's Restaurant and oil change facility, as well as parking lot and landscape lighting.

D. EXISTING AND PROPOSED PLANNING AND ZONING

The General Plan Land Use designation for the Project Site is General Corridor Commercial, which allows commercial uses with an emphasis on community serving retail. Per the Culver City Zoning Code (Zoning Code), the Project Site is majority zoned Commercial General (CG). The northern most parcel (APN 4215-001-020) adjacent to Machado Road is split-zoned CG and Single-Family (R-1). The Project is proposing to change the zoning designations for the Project Site to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.¹ To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a Project Site. The proposed PD zoning is consistent with the General Corridor Commercial land use designation, therefore, no change to the Project Site's existing General Plan designation is proposed.

¹ City of Culver City Zoning Code, Title 17, Section 17.560, Comprehensive Plans, [http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:culvercity_ca\\$anc=JD_17.560.005](http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca$anc=JD_17.560.005). Accessed September 3, 2020.

E. DESCRIPTION OF PROPOSED PROJECT

1. Proposed Land Uses

The Project would involve demolition of 35,011 sf of existing buildings on the Project Site to support the new mixed-use development. As shown in **Figure A-3, Conceptual Site Plan**, the Project would consist of five stories of development over one subterranean level for vehicular parking and building infrastructure. The proposed five-story building would be 67 feet tall (70.5 feet including the parapet) with a total building area of 555,221 sf, including all parking areas (subterranean, ground level, and above-ground) and usable building area of 311,109 sf.² The Project would have a 2.08 floor area ratio (FAR).³

As shown in **Table A-1, Development Program Summary**, and as further detailed below, the Project includes 244,609 sf of residential uses (including the residential lobby and amenity room) with 230 residential apartment units (including 19 affordable to very low income units); 66,500 sf of commercial uses, including a market, retail/restaurant uses and office uses; three levels of vehicular parking (653 spaces), including one subterranean level; and public and private open space areas.

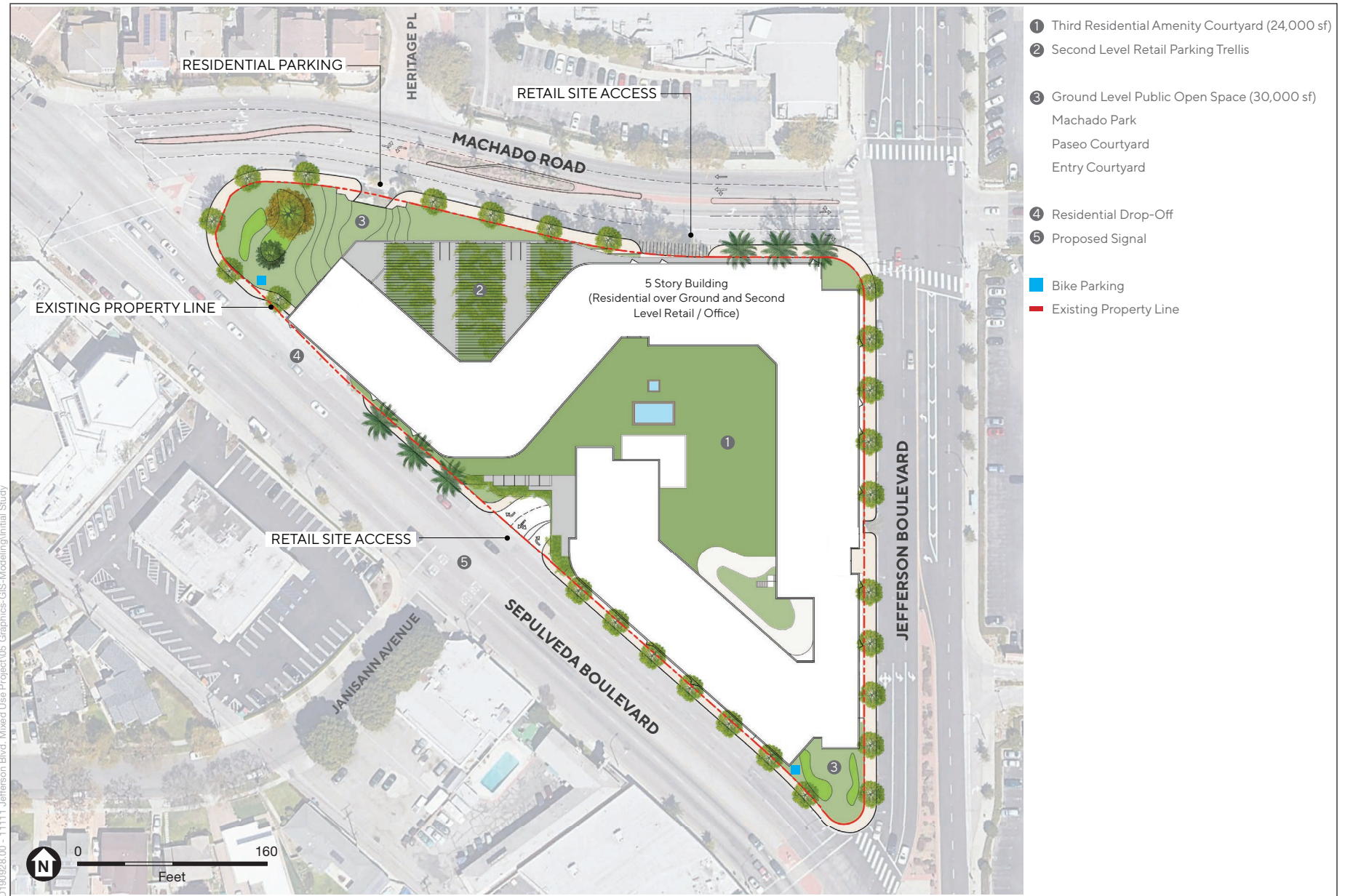
As shown in **Figure A-4, Ground Level Plan**, the ground floor level of the building would include a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, 1,950 sf gym, a 2,500 sf residential lobby and leasing office, and 81 vehicle parking spaces for retail uses, with a significant amount of outdoor landscaped open space. As shown in **Figure A-5, Second Level Plan**, the second level would include 11,450 sf of office space, and 230 vehicle parking spaces for commercial uses. The office uses would wrap around the parking garage area to shield the parking from the street. As shown in **Figure A-6, Third Level Plan**, the third level would include 76 residential units, one residential amenity courtyard at 24,000 sf, and a 2,500 sf amenity room. The fourth level would include 77 residential units, and the fifth level would include 77 residential units. An additional 241,256 sf would be developed for parking (subterranean, ground level, and second level).

² The building height is measured pursuant to Culver City Municipal Code Section 17.300.025, which requires that height be measured as the vertical distance from the existing grade of the site to an imaginary plane located the allowed number of feet above and parallel to the grade. The existing grade has been established here as 34.8 feet.

³ FAR is calculated by using the usable square footage of 311,109 sf divided by the 149,553 sf Project Site area.

**Table A-1
 Development Program Summary**

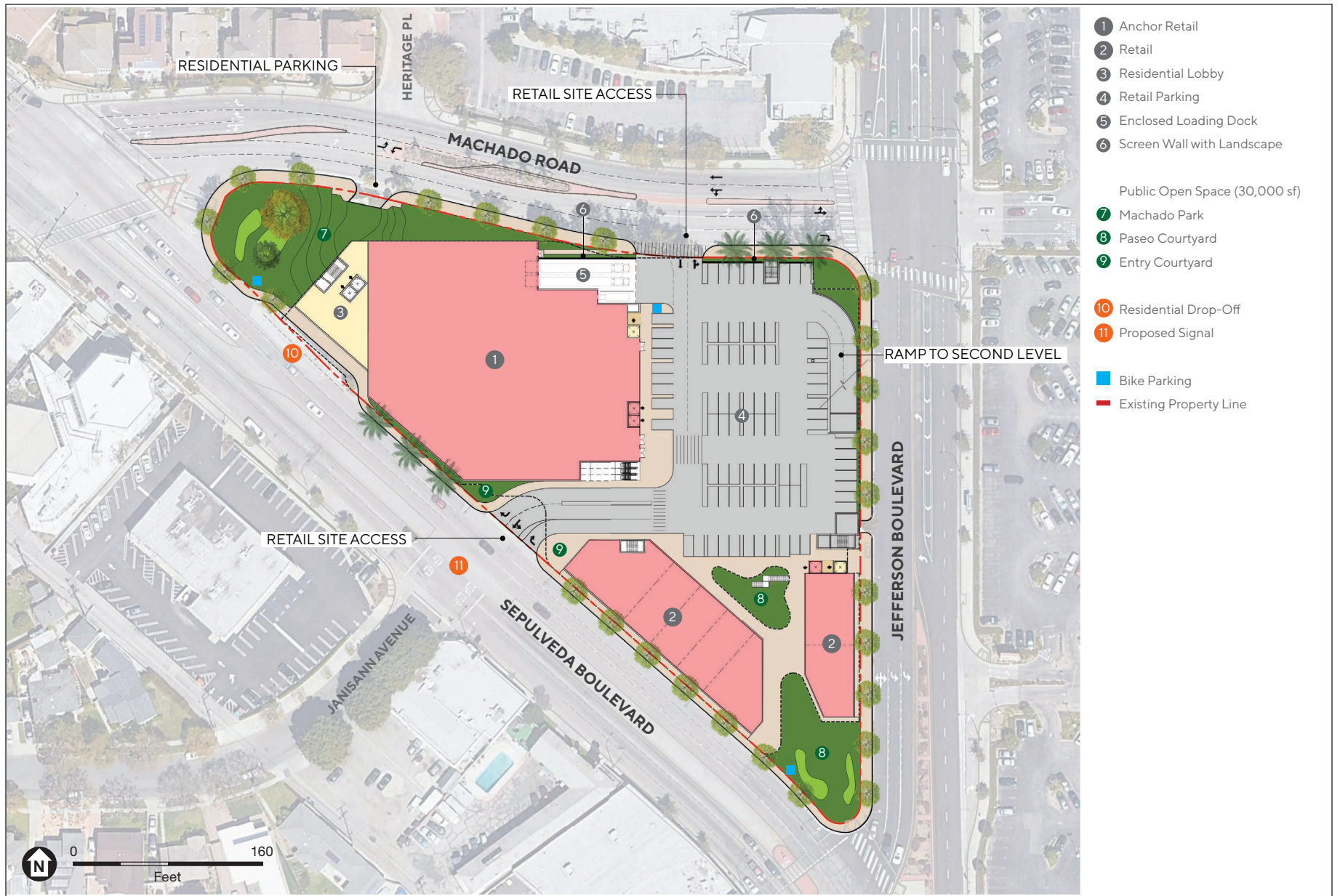
Use	Size/Units
Site Area (sf/ac)	149,553 sf/3.43 ac
Residential Component	
Studios	54 units
1-Bedrooms	112 units
2-Bedrooms	64 units
Residential Lobby	2,500 sf
Residential Amenity (Third Level)	2,500 sf
<i>Subtotal Residential Units</i>	<i>230 units</i>
	<i>244,609 sf</i>
Commercial Component	
Market	38,600 sf
Restaurant (High Turnover Sit-Down)	3,300 sf
Restaurant (Fast Casual)	4,900 sf
Coffee & Bakery	2,400 sf
Office	11,450 sf
Retail	3,900 sf
Gym/Fitness	1,950 sf
<i>Subtotal Commercial Square Footage</i>	<i>66,500 sf</i>
Total Residential and Commercial Square Footage	311,109 sf
Subterranean Parking	118,680 sf
Ground Level Parking	33,916 sf
Second Level Parking	88,660 sf
Loading Dock	2,856 sf
Total Project Square Footage	555,221 sf
Parking	
Residential Parking	308 spaces
Commercial Parking	311 spaces
ECF Parking	34 spaces
<i>Total Vehicle Parking Provided</i>	<i>653 spaces</i>
Bicycle Parking Spaces (Short/Long-Term)	71 / 26 spaces
Open Space	
Publicly Accessible Open Space	
Machado Park	15,000 sf
Paseo Courtyard	13,000 sf
Entry Courtyard	2,000 sf
<i>Subtotal Publicly Accessible Open Space</i>	<i>30,000 sf</i>
Common Open Space (for Residents)	
Courtyard (Third Level)	24,000 sf
Private Open Space (Balconies)	13,560 sf
<i>Total Open Space Provided</i>	<i>70,060 sf</i>
SOURCE: 3MR Capital, 2020.	



SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-3
Conceptual Site Plan



SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-4
Ground Level Plan



SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-5
Second Level Plan



SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-6
Third Level Plan

2. Open Space and Landscaping

Open space and landscaping would be provided in accordance with the CCMC. The Project would incorporate publicly accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests. As shown in Figure A-4 above, the Project would provide an approximately 15,000 sf Machado Park, which would be publicly accessible but privately maintained, that is expected to include such amenities as a children’s play area, and terraced landscaping and seating. The City also intends to include a bicycle share facility adjacent to Machado Park, as further described below. The Machado Park would link the publicly accessible open space areas along Machado Road from Sepulveda Boulevard to Jefferson Boulevard. An approximately 13,000 sf Paseo Courtyard at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site would welcome pedestrian, bike, bus and other foot traffic through and into the Project Site. An additional 2,000 sf courtyard (Entry Courtyard) at the entrance on Sepulveda Boulevard across from Janisann Avenue would also be provided to welcome patrons to enjoy both corner food offerings as well as a direct path to both the grocer entrance and the courtyard spaces internally sheltered from area traffic. All publicly accessible open space areas on the ground floor would be accessed from Machado Road, Sepulveda Boulevard, and Jefferson Boulevard, as well as from the interior of the Project Site from the ground-floor parking level or via escalators from the above- and below-ground parking levels.

As shown in Figure A-6 above, the third story of the building would offer common open space for the Project’s residents in the form of a centrally located 2,500 sf amenity room and a large 24,000 sf open air courtyard. The amenity room and courtyard would include a pool and sun deck which would be set back from and screened by the building, a fitness center, BBQ area, conference room/business center, and storage facilities in the residential leasing office and parking garage. Bicycle lockers and a repair station would be provided in the subterranean parking level for residents. Balconies with a minimum size of 52 sf for studios, 62 square feet for one bedroom units, and 72 square feet for two bedroom units would be provided for the residential uses.

The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site. Landscaping would emphasize native, Mediterranean and drought tolerant plants (e.g., Agave, Aloe, ornamental grasses, leafy groundcovers, colorful shrubs, and soft textured plants).

3. Vehicular and Bicycle Access, Circulation, and Parking

Vehicular Access

Vehicular access to the Project Site would be provided from three driveways: one on Sepulveda Boulevard at Janisann Avenue and two on Machado Road. The driveway on Sepulveda Boulevard and the east driveway on Machado Road (closer to Jefferson Boulevard) would serve retail, market, and office uses. The west driveway on Machado Road opposite Heritage Place would provide access for resident and resident guest parking, and for ECF parking all located below grade. Access for trucks and deliveries would be off of Machado Road where they would access a 2,856 sf loading dock within the Project Site via the eastern-most retail entrance. The loading dock would be set back from Machado Road and would be screened and enclosed to reduce potential noise effects on residents located north of the Project Site. A separate loading and drop-off area is planned in front of the residential lobby entrance on Sepulveda Boulevard. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard.

Machado Road Improvements

Machado Road currently includes an 8-foot sidewalk, two eastbound vehicle through lanes which expand to three lanes at the intersection to accommodate the turn pockets (10 feet, 10 feet, and 13 feet wide), an eight-foot landscaped median, two westbound vehicle through lanes that transition into three lanes at the intersection to accommodate the turn pockets (10 feet, 10 feet, and 13 feet wide), and then another sidewalk.

The Project would provide new 8-foot sidewalk, curb, and street trees on the Western edge of Machado Road.

Bicycle Access

Bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level. Separate from the Project, the City intends to implement a bicycle share facility adjacent to the Machado Park. The bicycle share facility would allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Bicycle & Pedestrian Action Plan.

Pedestrian Circulation

The Project Site is oriented such that visitors and residents would be able to walk through and around the Project Site. New 8-foot wide sidewalks would be installed on Sepulveda and Jefferson Boulevards, as well as on Machado Road. The ground floor retail uses at the corner of Sepulveda Boulevard and Jefferson Boulevard, along with the market, would serve as pedestrian points of interest on the Project Site. The Paseo Courtyard, located between the retail uses at Sepulveda Boulevard and Jefferson Boulevard would provide open space for people to gather and interact with the retail. People would be able to access the residential lobby through the Machado Park along Machado Road. Pedestrians would also be able to easily access the retail market from Sepulveda Boulevard or from Machado Road. Pedestrians would also be able to access the market from the Paseo Courtyard by walking past the retail uses.

Vehicle and Bicycle Parking

Structured parking containing 653 vehicular parking spaces would be provided on the Project Site with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for ECF. The subterranean parking level would include 292 parking spaces for residential tenants, 16 parking spaces for residential guests, and 34 parking spaces for ECF. The vehicle parking spaces for residential guests would be clearly identified either by specific ground painting or wall signage/decals and would be located within the residential garage in the subterranean parking level only. All subterranean parking would be secured under an access control system. The 34 vehicular parking spaces for ECF would be located within the subterranean parking level and would be identified as being fully dedicated to ECF. The ground floor parking level would include 81 vehicle parking spaces for the retail uses, and the second floor parking area would include 230 vehicle parking spaces for both ground floor retail and second level office use. There would be 71 long-term and 26 short-term bicycle parking spaces provided in various locations throughout the Project Site.

Public Transit

The Culver City Bus has multiple stops that travel along the Project Site frontages, including Line 2, which travels east/west along Jefferson Boulevard from Mar Vista to Fox Hills and the Culver City Transit Center; Line 3, which travels north/south along Sepulveda Boulevard and Jefferson Boulevard and provides service to the Los Angeles County Metropolitan Transportation Authority (Metro) E Line (Expo) Light Rail at Westwood/Rancho Park Station; Line 4, which travels north/south along Jefferson Boulevard and provides service to the Metro E-Line (Expo) Light Rail at the La Cienega Station; Line 5, which travels east/west along Braddock Drive from Culver City to Marina Del Rey; Line 6, which travels north/south along Sepulveda Boulevard from UCLA to the Metro Green Line Station; and Rapid 6, which travels north/south along Sepulveda Boulevard and provides service to the Metro E-Line (Expo) Light Rail at Expo/Sepulveda Station.

The Project includes the proposed relocation of the bus stop for Culver City Bus Line 6 on Sepulveda Boulevard. As currently proposed, the northbound bus stop would shift approximately 100 to 200 feet south from its current location at the intersection of Machado Road and Sepulveda Boulevard, to just north of the newly signalized intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes the proposed relocation of the bus stop for Culver City Bus Lines 3 and 4 on Jefferson Boulevard. As currently proposed, the southbound bus stop would shift approximately 100 to 200 feet north from its current location on Jefferson Boulevard, to just south of the signalized intersection of Machado Road and Jefferson Boulevard.

Transportation Demand Management Program

Transportation demand management (TDM) and mobility components may include a City-implemented bicycle-share parking area, traffic calming, traffic signal and pedestrian safety enhancements, employee incentives to reduce vehicular traffic to the Project Site, dedicated ride-share drop off locations, rideshare matching, and TDM education and awareness programs for residents, employees, and visitors. In accordance with the California Green Building Standards Code (CALGreen Code), infrastructure for electric vehicle (EV) charging stations would be provided.

4. Lighting and Signage

Lighting for the Project is intended to minimize light trespass and glare from buildings and the Project Site onto adjacent properties, to provide comfort, safety, and nighttime visibility through shielded, focused and directed illumination. Project materials would also be selected to avoid highly reflective surfaces that would result in adverse glare effects on motorists or adjacent uses. Signage for the Project's residential, office and market/retail uses would be provided in accordance with the CCMC. There would be wayfinding signage for Project residents, employees and visitors, as well as public signage identifying access to parking facilities. Additional signage would be available to ensure that routes to rideshare, bus stops, and other transportation is clear for those accessing and departing from the Project Site.

5. Site Security

The Project would incorporate a security program to ensure the safety of Project residents, employees, and visitors. Controlled access to the building interiors would be provided as appropriate. For example, controlled access would be provided to the residential areas of the Project Site at all times. Access to retail uses and publicly accessible open space areas would be unrestricted during business hours. Public access would be available to those who wish to use or interact with these spaces, including the Machado Park, after business

hours; however, on-site security would be available to ensure that residents and visitors are not disturbed. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include the provision of 24-hour video surveillance and security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings, including parking; managing and monitoring fire/life/safety systems; and patrolling the property. Project design would also include lighting of entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.

6. Sustainability Features

Energy efficiency, water conservation, and the reduction of greenhouse gas emissions would be considered in the design, construction, and operation of the building and its proposed new uses. Some of the Project's proposed design features that would contribute to energy efficiency include energy-efficient appliances, water-efficient plumbing fixtures and fittings, and water-efficient landscaping. All Project components would, at a minimum, meet Culver City's mandatory Green Building Program requirements. The Project would supply 1 kilowatt (kW) of solar photovoltaic power. In accordance with the CALGreen Code, infrastructure for EV charging stations for both the residential and retail uses on the Project Site would be provided and meet local applicable Codes. The Project would include 132 EV capable spaces, 66 of which would be EV-ready and 66 of which would have full EV chargers and stations.

7. Construction Schedule/Activities

A Construction Management Plan would be prepared which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, to ensure minimal impacts to neighboring land uses and to avoid interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management Plan, would require regular oversight by the City and would facilitate communication and coordination with residents and others in the neighborhood. A final comprehensive Construction Traffic Management Plan would be subject to review and approval by the City prior to starting of any construction activity. The Plan would include but not necessarily be limited to: name and telephone number of a contact person regarding traffic complaints or emergency situations; community notification procedures; contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity; procedures for training the flag person(s) used in implementing the plan; the location, times, and estimated duration of any temporary lane closures; managing the approved haul route plan; and a construction parking management plan.

The Project would comply with CCMC Section 9.07.035's allowable construction hours of:

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00 PM

In the event that special construction activities such as concrete pours, oversized equipment delivery, or mobile crane placement are required after permitted hours of construction, a Temporary Use Permit would be required from the City pursuant to CCMC Section 9.07.035.

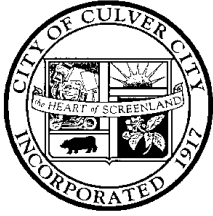
The Project would require excavation to accommodate subterranean parking, building foundations, utilities and other improvements. Up to approximately 88,000 cubic yards of earthwork would be excavated and exported from the Project Site. The Project would excavate to a maximum depth of 25 feet below grade.

Project construction would occur in one phase and is anticipated to commence as early as the second quarter of 2022 and be completed by the third quarter of 2024 for a total of approximately 26 months.

F. NECESSARY APPROVALS

Discretionary entitlements, reviews, and approvals required or requested for the Project may include, but would not necessarily be limited to, the following:

- General Plan Amendment;
- Zoning Code/Map Amendment;
- Adoption of a Comprehensive Plan for the Project, which would establish the development standards for the Project Site;
- Community Benefits Request;
- Density Bonus Request;
- Vesting Tentative Tract Map;
- Certification of the EIR for the Project;
- Demolition Permits to remove the existing on-site structures to allow for construction of the Project;
- Construction Permits, including building, grading, excavation, foundation, and associated permits;
- Haul Route Permit, as may be required by Culver City; and
- Other discretionary and ministerial approvals as needed and as may be required.



ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Project Site is located in a highly urbanized area, with a mix of commercial and residential uses in the nearby vicinity. The topography surrounding the Project Site is relatively flat with no ocean, or notable mountain or other scenic vistas that would be affected by the Project. More specifically, the ocean is approximately 4.2 miles to the west across flat topography with intervening development, and areas of Baldwin Hills and Culver Crest which can be viewed from the Project Site and surrounding areas have been altered from their natural condition by residential and oil field development. Further, the Project Site is not located in a scenic resource area or area with protected views designated by the City. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a three single-story commercial buildings, large areas of asphalt-paved surface parking, and landscaping. The Project Site is not located in the vicinity of a City or State-designated scenic highway. In addition, the Project Site does not contain any unique or locally recognized, natural (i.e., rock outcroppings and trees), features or designated historic buildings.¹

In addition to street trees surrounding the Project Site, there is a mix of ornamental landscaping on the Project Site, including a number of mature eucalyptus and palm trees, with the most concentrated plantings along Machado Road. All landscaping and trees on the Project Site would be removed as part of the Project. The Project would include a substantial amount of open space, including a Machado Park, a Paseo Courtyard area at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site, and an Entry Courtyard at the entrance on Sepulveda Boulevard across from Janisann Avenue. These areas would incorporate landscaping and trees that would offset the loss of landscaping on the Project Site. As discussed under Response IV.e, below, the Project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Based on the City's requirements, the Project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the Project Site. Pursuant to CCMC Section 9.08.215, the size and location of the replacement trees would

¹ City of Culver City, Historic Preservation, <https://www.culvercity.org/live/community-neighborhood/historic-preservation>. Accessed September 3, 2020.

be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway.

Overall, based on the above, the Project would not substantially damage scenic resources, including those located within the vicinity of a scenic highway. Accordingly, impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the Project is in an urbanized area, would the Project conflict with applicable zoning or other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in an urbanized area. The aging buildings and surface parking lots within the Project Site have low aesthetic value. The Project Site includes a sparsely landscaped open space area with decomposed granite and a decorative fountain. The Project Site is surrounded by commercial and residential uses. As such, the analysis provided below analyzes whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The Culver City General Plan (General Plan), CCMC, and Residential Parkway Design Guidelines include goals, objectives, and policies, that govern scenic quality.

As part of the Open Space Element of the General Plan, Objective 6 establishes an objective to protect view resources, view corridors, and scenic viewpoints. As previously discussed in Response I.a and I.b, above, development of the Project would have less than significant impacts as it relates to scenic vistas and scenic resources and therefore would not conflict with this objective. In addition, as part of the Land Use Element of the General Plan, Objective 6 establishes an objective to revitalize the physical character and economic well-being of the City's commercial corridors, and Policy 6.A encourages revitalization of commercial corridors in the City through new development and renovation of existing structures with incentives which address development standards and the project approval process. The Project would demolish three single-story commercial buildings and associated surface parking lots and landscaping, and redevelop the Project Site with a five-story mixed-use residential and commercial building with landscaping, the Machado Park, and other amenity areas. Redevelopment of the Project Site with unified high quality architecture and open space areas, as well as elimination of large areas of surface parking, would serve to revitalize the corner of Jefferson Boulevard and Sepulveda Boulevard, which is part of a General Commercial Corridor, in support of this objective and associated policy. Furthermore, as part of the Land Use Element of the General Plan, Objective 12 establishes an objective to ensure that new construction is accomplished with the highest quality of architecture and site design. As previously stated, redevelopment of the Project Site with high quality architecture, landscaping, the Machado Park, and other open space/amenity areas, would support consistency with this Objective.

Section 17.310.030, requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Project would comply with Section 17.310 of the CCMC regarding landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements, and general requirements for the type of landscaping and irrigation. The Preliminary Landscape Plan includes features such as: proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary list of plant materials. The Final Landscape Plan identifies features such as: plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

Additionally, the Project would be subject to CCMC Section 15.02.115, the Urban Tree Requirements, which is a component of the City's Green Building Program. This section requires that when feasible, all existing on-site trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Parks Manager; and when feasible, all existing street trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Engineer. Pursuant to CCMC Section 9.08.215, Removal of Trees in Parkway Related to Private Improvement or Development Project, the Project is required to plant two new street right-of-way trees or parkway trees for each street tree that is removed in the public right-of-way. The size and location of replacement trees would be determined by the Public Works Director based on the street or parkway.

CCMC Section 15.02.1100A.12, requires that all new lighting installed in a garage or parking structure shall be motion-sensor controlled and that minimum base level lighting shall be permitted. CCMC Section 17.330, Signs, provides a comprehensive system for the regulation of signs in the City in order to address community aesthetics, vehicular and pedestrian safety, property values, and the visual environment. CCMC Section 17.330.020.B, Table 3.5, and CCMC Section 17.330.025 identify the types of signs allowed in non-residential zoning districts and the corresponding maximum sign area, maximum sign height, maximum number of signs, location, and additional requirements. Section 17.330.030, General Requirements for All Signs, includes requirements for sign area measurement, sign height measurement, sign location requirements, aesthetic design standards, sign illumination, installation, and maintenance standards.

Overall, based on the analysis provided above, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Light and Glare

Less Than Significant Impact. The Project Site is currently developed with three single-story commercial buildings and associated areas of surface parking. The Project Site is located in a highly urbanized area, with a mix of low-rise commercial and residential. The Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, existing buildings, and surface parking lots on the Project Site, as well as from adjacent commercial properties located south and east of the Project Site. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural enhancement, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the major and secondary surface streets contribute to overall ambient lighting levels as well.

Similar to existing surrounding uses, the Project would include low to moderate levels of interior and exterior lighting for security, parking, signage and architectural enhancement. As stated in Attachment A, Project Description, of this Initial Study, lighting for the Project would be shielded, focused and directed to avoid any substantial light trespass onto adjacent properties. All proposed lighting for the Project's residential, office and market/retail uses would be provided in accordance with CCMC Section 17.300.040, which provides the general standards for outdoor lighting to regulate lighting fixtures and design, energy use, light shielding, light intensity, and lighting placement. Additionally, the Project would comply with CCMC Section 15.02.110A.12, which requires that all new lighting installed in a garage or parking structure shall be motion-sensor controlled and that

minimum base level lighting shall be permitted. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant, and this issue need not be evaluated further in an EIR.

Glare from sunlight reflected off of reflective materials utilized in existing buildings can be substantial and have an adverse effect on motorists and other land uses. As stated in Attachment A, Project Description, of this Initial Study, Project materials would be selected to avoid highly reflective surfaces that might otherwise result in substantial glare effects on motorists or adjacent uses. To the extent some glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Shade and Shadow

Less Than Significant Impact. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures. Sensitive uses include “routinely usable outdoor spaces” associated with residential, recreational, or institutional uses (e.g., schools, convalescent homes), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade-sensitive uses in the Project vicinity include the backyards of the residential uses north of the Project Site and the ECF located north of the Project Site.

In order to determine the extent of shading impacts, shading diagrams of the worst case scenarios (longest shadows) have been prepared that show adjacent off-site shade-sensitive uses on an aerial photograph. The shading diagrams illustrate the shadows cast by the Project on nearby surrounding uses in **Figure B-1, Winter Solstice (December 21) Shadows**, during the winter solstice on December 21 from 9:00 A.M. to 3:00 P.M.; in **Figure B-2, Spring Equinox (March 21) Shadows**, during the spring equinox on March 21 from 9:00 A.M. to 5:00 P.M.; in **Figure B-3, Summer Solstice (June 21) Shadows**, during the summer solstice on June 21 from 9:00 A.M. to 5:00 P.M.; and in **Figure B-4, Fall Equinox (September 21) Shadows**, during the fall equinox from 9:00 A.M. to 5:00 P.M. For purposes of this analysis, a Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.²

No shadow-sensitive uses would be subject to significant new shading by the proposed building for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October. As shown in Figure B-1, during the winter solstice, an overlap of shadows would occur on the eastern side of Machado Road by the ECF. However, as the shadow overlap would only occur on the surface parking lot and on the sidewalk, rather than on the school itself, impacts would be less than significant. As a result, the Project would not significantly increase shading of adjacent shadow-sensitive uses. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

² Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. The City of Culver City relies on the criteria set forth in the City of Los Angeles’ CEQA Thresholds Guide (2006) to determine shade/shadow impacts on shade sensitive uses.



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SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-1
Winter Solstice (December 21) Shadows





SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-2
Spring Equinox (March 21) Shadows





D:\90928.00 - 11111 Jefferson Blvd - Mixed Use Project\05 Graphics-GIS-Modeling\Illustrator

SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-3
Summer Solstice (June 21) Shadows





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SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-4
Fall Equinox (September 21) Shadows



II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with three single-story commercial buildings, surface parking, and landscaping. The Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.³ Furthermore, the General Plan does not identify the Project Site as an area designated for agriculture use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impacts would occur, and this issue need not be evaluated further in an EIR.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The General Plan Land Use designation for the Project Site is General Corridor Commercial and the corresponding zoning designation is Commercial General (CG) and Single-Family (R-1). Per the Culver City Zoning Code, no portion of the Project Site or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur. Therefore, no impacts would occur, and this issue need not be evaluated further in an EIR.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As discussed in the Response II.b, the Project Site is currently developed and is designated as General Corridor Commercial. No forest land or timberland zoning is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, no impact would occur, and this issue need not be evaluated further in an EIR.

³ State of California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed September 3, 2020.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land exists on the Project Site or in the surrounding area. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur, and this issue need not be evaluated further in an EIR.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Since there are no agricultural uses or related operations on or near the Project Site, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts would occur, and this issue need not be evaluated further in an EIR.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current 2016 Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollution control measures needed to meet Federal particulate matter (PM_{2.5}) and Ozone (O₃) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs. The Project would increase the amount of air emissions which could affect implementation of the AQMP due to increased traffic and energy consumption, including potential increases in the amounts of gas and electricity needed to support the Project. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be evaluated further in an EIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O₃) standards, as well as the current particulate matter (PM₁₀ and PM_{2.5}) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard on the basis of source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designated the

Los Angeles County portion of the basin as attainment for lead. The Project would result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O₃, PM₁₀, and PM_{2.5}. As such, implementation of the Project could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Project area. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in the Studio Village neighborhood of Culver City, which includes a low- to medium-density mix of uses, including sensitive residential uses north and northwest of the Project Site and Temple Akiba west of the Project Site. Construction activities and operation of the Project could increase localized air emissions, carbon monoxide (CO) concentrations, and toxic air contaminants (TACs) at these and other sensitive uses in the area above current levels. Therefore, it is recommended that this topic be evaluated further in an EIR.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of volatile organic compounds from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Air Toxics Control Measure (ATCM) that limits diesel-fueled commercial vehicle idling to five minutes at any given location, which was adopted in 2004. The Project would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and State measures, construction activities and materials would not result in other emissions that create objectionable odors. The nearest existing sensitive receptors are residences to the north of the Project Site. Construction of the Project's proposed uses would not be expected to generate emissions leading to nuisance odors that would adversely affect nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve elements related to these types of uses. The Project would otherwise include proper housekeeping practices for trash receptacles and other components or activities such that adverse odor impacts would be avoided similar to other like residential and commercial uses in the City. Impacts with respect to odors would be less than significant, and this issue need not be evaluated further in an EIR.

IV. BIOLOGICAL RESOURCES

Would the Project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with commercial buildings and associated parking. No suitable habitat for candidate, sensitive, or special status species exists, and for this reason and because of the density of development and high levels of human activity in the Project area, there is no potential for the Project Site to support candidate, sensitive, or special status species on the Project Site. The Project would not have a substantial adverse effect on candidate, sensitive, or special status species, no impact would occur, and this issue need not be evaluated further in an EIR.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?**

No Impact. As discussed under Response IV.a, the Project Site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. The Project Site currently supports a limited amount of ornamental landscaping. As such, the Project would not have a substantial adverse effect on riparian habitat or any other sensitive natural community. The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur, and this issue need not be evaluated further in an EIR.

- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. As discussed under Response IV.a, the Project Site is currently developed. The Project Site does not contain any state or federally protected wetlands. As such, the Project would not have a substantial adverse effect on state or federally protected wetlands and no impact would occur, and this issue need not be evaluated further in an EIR.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?**

Less Than Significant Impact With Mitigation Incorporated. The Project Site is currently developed and located in a highly urbanized area of the City. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible. Jefferson Boulevard and Sepulveda Boulevard are highly utilized streets with high levels of ambient noise and human disturbance associated with pedestrian and vehicular traffic.

Nonetheless, the Project Site currently contains ornamental trees and landscaping, and there are adjacent street trees, all of which could support raptor and/or songbird nests for native species tolerant of human disturbance.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 Code of Federal Regulations [CFR] Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). As the Project would include the removal of existing trees on the Project Site and potentially remove adjacent street trees, the removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Accordingly, Mitigation Measure MM-BIO-1 is provided below to reduce potential impacts to protected nesting birds consistent with the Federal MBTA. Impacts would be less than significant with mitigation incorporated and this issue need not be further analyzed in an EIR.

Mitigation Measure

MM-BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either:

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

Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure

that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The Project Site supports only ornamental landscaping; there are no protected trees on site. Project implementation would result in removal of ornamental landscaping and trees, but would also include substantial areas of landscaped open space, including trees. As there are no protected trees or biological resources on the Project Site, such activities would not conflict with local policies or ordinances protecting biological resources.

Project implementation would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.215: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the CCMC, the Project is required to plant two new street right-of-way trees or parkway trees for each street tree that is removed in the public right-of-way. The size and location of replacement trees would be determined by the Public Works Director based on the street or parkway. With compliance to the applicable street tree removal and replacement provisions of the CCMC, impacts on street trees would be less than significant, and this issue need not be evaluated further in an EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As discussed in the Response IV.b, no designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site or the City. The Project would have no impact with respect to these plans, and this issue need not be evaluated further in an EIR.

V. CULTURAL RESOURCES

Would the Project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Potentially Significant Impact. A historical resource is defined in Section 15064.5 of the CEQA Guidelines as:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.

- (3) Any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, resources are considered historically significant if the resources are associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

Based on records at the Culver City Building Department, the Coco's Casual Restaurant chain (building permit issued in October 1967) and the United States Post Office (building permit issued in February 1961 and evidenced on the Project Site on 1963) are both over 45 years in age and pursuant to CEQA, they will be evaluated to determine if they qualify as historical resources. The oil change facility was constructed sometime after 1994 when aerial photographs show that the previous structure at that location had been demolished. Therefore, the oil change facility does not require evaluation under CEQA. A historic resource assessment will be conducted to determine if the United States Post office and Coco's Casual Restaurant Chain qualify for listing in the National Register of Historic Places, California Register of Historical Resources, or City of Culver City Landmarks Register, and would therefore be considered historical resources under CEQA. The assessment and the analysis provided within the Draft EIR will document the construction history and ownership/occupancy for the two buildings, provide historical background research to develop the historic context for evaluation of the buildings, and evaluate eligibility for listing in the abovementioned registers. In the event the buildings are found to qualify as historical resources, impacts associated with their demolition will be assessed as well as any potential for the Project to result in indirect impacts to other historical resources that may exist in the surrounding area. Therefore, this topic will be further analyzed in the EIR to determine potential impacts associated with historical resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with buildings, surface parking and ornamental landscaping. However, because grading or excavation at the time of prior construction was likely limited, the potential existence of extant archaeological resources is unknown, and as with other areas of the City, archaeological resources may be present. Project construction would require grading and excavation activities for building foundations and one level of subterranean parking that could extend into native soils and could disturb existing but as yet undiscovered archaeological resources. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As previously indicated, the Project Site is fully developed. Nevertheless, the Project would require excavation that could extend into native soils, with the potential to encounter previously unknown human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section

7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24-hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant, and this issue need not be evaluated further in an EIR.

VI. ENERGY

Would the Project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Potentially Significant Impact. The Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with electricity, natural gas and transportation fuel. Although the increase in energy consumption is not anticipated to be wasteful, inefficient, or unnecessary and would comply with existing energy conservation plans, it is recommended that this topic be evaluated further in an EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. The Project would be required to comply with the California Green Building Standards (CALGreen Code) pursuant to Title 24, Part 11 of the California Code of Regulations (CCR). In conformance with these requirements, the Project would be designed to incorporate various energy and resource conservation measures. In addition, the Project would implement applicable energy and resource conservation measures such as those described in CARB's Assembly Bill (AB) 32 Climate Change Scoping Plan and supporting documents. However, further evaluation in an EIR is required to determine if the Project would achieve consistency with state or local plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

The following geology and soils discussion is based on the Report of Geotechnical Engineering Services (Preliminary Geotechnical Report), dated April 19, 2019, which was prepared by GeoDesign, Inc. and is available for review at the Culver City Planning Division.

Would the Project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface

displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS has identified earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

The Project Site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Engineering Investigation conducted for the Project indicates that no currently known active or potentially active surface faults traverse the Project Site, and the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the Project Site is the Newport Inglewood Fault Zone is located approximately 1.5 miles east of the Project Site.⁴ In addition, the Overland Avenue Fault is located approximately 2,000 feet east of the Project Site, along Overland Avenue. It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault. As such, the potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered low. Furthermore, Project buildings would be designed and constructed to resist the effects of seismic ground motions as provided in the Culver City Building Code and the 2019 California Building Code. Therefore, the Project would not directly or indirectly cause potential substantial adverse impacts associated with the rupture of a known earthquake fault. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The City, as with all of Southern California, is subject to strong ground shaking. As such the Project Site is located in a seismically active region. As discussed above, two nearby faults include the Newport-Inglewood Fault and Overland Avenue Fault. Earthquakes are unavoidable hazards although the resultant damage can be minimized through appropriate seismic design and engineering.

The City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the 2019 California Building Code for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults. Furthermore, the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. The Project would also be required to comply with applicable seismic-related regulatory requirements. In addition, a final design-level geotechnical report must ultimately be prepared and approved by the City prior to issuance of building permits, and would be based on the final construction and building plans prepared by the Applicant. Implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the final design-level geotechnical report would further ensure that seismic-

⁴ California Department of Conservation, Fault Activity Map of California, 2010, <http://maps.conservation.ca.gov/cgs/fam/>. Accessed September 3, 2020.

related ground shaking impacts would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Liquefaction typically occurs in areas where groundwater is less than 50 feet from the surface, and where the soils are composed of poorly consolidated, fine to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

According to the State of California Seismic Hazard Zone Map of the Venice Quadrangle, provided in the Preliminary Geotechnical Report, the Project Site is located within a liquefaction hazard zone. The Preliminary Geotechnical Report performed a liquefaction analysis for the Project Site based on soil conditions encountered at the Project Site and earthquake hazard mapping as well as the historic high ground water level that was determined to be 9 feet below ground surface. Based on subsurface conditions, laboratory testing, the historic high ground water level, and the analysis provided in the Preliminary Geotechnical Report, it was estimated that up to 1 inch of liquefaction-induced settlement is possible at the existing ground surface. However, the liquefaction potential reduced to negligible amounts for the considerably lower groundwater level at 38 feet to 43 feet below ground surface observed on portions of the Project Site. As there is a potential for liquefaction-induced settlement in portions of the Project Site, the final design-level geotechnical report would provide site-specific design parameters and recommendations to mitigate the effects of liquefaction. Specifically, the Preliminary Geotechnical Report recommends seismic design parameters determined in accordance with Chapter 16, Section 1613 of the California Building Code and American Society of Civil Engineers. In addition, the Project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2019 California Building Code. With compliance of the regulatory requirements as well as implementation of the site-specific design parameters and recommendations of the final design-level geotechnical report, seismic-related ground failure impacts, including liquefaction, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Landslides?

Less Than Significant Impact. The Project Site is relatively flat with elevations ranging from approximately 33 feet to 35 feet. According to the City's GIS Hazards map, the Project Site is located outside the areas identified as susceptible to earthquake-induced landslides.⁵ Based on this information, impacts from landslides would be less than significant, and this issue need not be evaluated further in an EIR.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in a

⁵ City of Culver City. Seismic Hazards, dated February 1, 2007, <http://www.culvercity.org/home/showdocument?id=124>. Accessed September 3, 2020.

Project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

The Project Site is located in a highly urbanized area of Culver City and is currently developed. Negligible, if any, native topsoil is likely to occur on the Project Site as it is currently developed with three single-story commercial buildings and associated surface parking. Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. Specifically, construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the California Building Code and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. Following Project construction, the Project Site would be covered completely by paving, structures, and landscaping, and would generate little if any soil erosion. Thus, impacts due to erosion of topsoil would be less than significant as the Project would comply with applicable regulatory requirements, and this issue need not be evaluated further in an EIR.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed in the Preliminary Geotechnical Report, subsurface conditions consist of 12 to 16 feet of stiff clay with variable sand content underlain by alternating layers and/or lenses of medium dense to very dense sand with variable fines content and medium stiff to very stiff clay with variable sand content. Soft to medium stiff, high plasticity clay was also encountered from 22 to 29 feet below ground surface in Boring B-1 and loose silty sand was encountered from 29 to 33 feet below ground surface in Boring B-4.

Impacts related to liquefaction and landslides are discussed above in Responses VII.a.iii. and VII.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As noted in the Preliminary Geotechnical Report, there are no major open faces close to the Project Site. In addition, as stated in Response VII.a.iii, above, the final design-level geotechnical report would provide site-specific recommendations for Project Site preparation, excavation, foundation design, and shoring/retaining wall specifications to minimize the effects of liquefaction, which would in turn reduce the potential for lateral spreading. Furthermore, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at

the Project Site. Thus, there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site.

The Project construction and design would be required to comply with the 2019 California Building Code, which is designed to assure safe construction, and implementation of the site-specific design measures including foundation design recommendations of the final design-level geotechnical report would further ensure that ground and soil stability hazards would not become unstable as a result of the Project. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. As discussed in the Preliminary Geotechnical Report, expansive soils were not encountered in the borings within close proximity to the existing ground surface; however, an approximately 5- to 7-foot thick layer of high plasticity clay, which would be expansive, was encountered at depths between 21.5 and 40.5 feet below ground surface. Other discontinuous zones of high plasticity clay may also be present at the Project Site. As such, if high-plasticity clay is identified within the upper few feet at the site during construction, the Preliminary Geotechnical Report recommends removal and replacement of high-plasticity clay with non-expansive soil beneath foundations. As such, with the incorporation of recommendations provided in the final design-level geotechnical report, the Project would not create a substantial direct or indirect risk to life or property. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project Site is located in an urbanized area where municipal wastewater infrastructure already exists. The Project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and this issue need not be evaluated further in an EIR.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The 3.43-acre Project Site is currently developed with three single-story commercial buildings, surface parking and landscaping. Although, the Project would not directly or indirectly destroy a unique geologic feature, it would require grading and excavation for building foundations and subterranean parking that could extend into native soils and/or geologic features potentially containing paleontological resources. Therefore, it is recommended that this topic be evaluated further in an EIR.

VIII. GREENHOUSE GAS EMISSIONS

Would the Project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Construction and operation of the Project would generate greenhouse gas (GHG) emissions which have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. Therefore, it is recommended that this topic be further evaluated in an EIR.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The Project would be required to comply with the CALGreen Code. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy and resource conservation measures. In addition, the Project would implement applicable energy and resource conservation measures to reduce GHG emissions such as those described in CARB's AB 32 Climate Change Scoping Plan and supporting documents, which describes the approaches the State will take to reduce GHG emissions to 1990 levels by 2020. CARB adopted the 2017 Climate Change Scoping Plan in response to Senate Bill (SB) 32 that outlines the State strategy for meeting the GHG reduction target for the State of 40 percent below 1990 levels by 2030. Further evaluation in an EIR is required to determine if the Project would achieve consistency with these plans, policies and regulations.

IX. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based on the Phase I Environmental Site Assessment, 5350/5380 Sepulveda Boulevard and 11111 Jefferson Boulevard, Culver City, California 90230 (Phase I ESA), dated March 25, 2019, and the Phase II Environmental Site Assessment, 5350/5380 Sepulveda Boulevard and 11111 Jefferson Boulevard, Culver City, California 90230 (Phase II ESA), dated September 14, 2019, both of which were prepared by Stantec and are available for review at the Culver City Planning Division.

Would the Project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials may be used during the construction phase of the Project. Hazardous materials that may be used include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners, adhesives, surface coatings and possibly herbicides and pesticides. Generally, these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration (OSHA) requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to compliance with applicable and required standards and regulations.

Project operations would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, pesticides for landscaping, and chemicals for pool maintenance. These hazardous materials are commonly used and regulated by federal and state laws mandating their proper transport, use, storage and disposal in accordance with product labeling. Additionally, the use of these materials would be in small quantities and their use and storage is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations. As with construction emissions, any emissions from the use of such materials regarding operation of the Project would be minimal and localized to the Project Site.

Overall, based on the above, construction and operation of the Project would have a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment, and this issue need not be evaluated further in an EIR.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. Construction of the Project could potentially produce hazardous wastes associated with the use of asphalt, paint, petroleum, and other solvents. All hazardous materials would be required to be utilized and transported according to regulations. Due to the ages of the buildings that may be affected during the Project, there is likely to be potential for asbestos and lead-based paint to be encountered. Demolition would require remediation and abatement. Additionally, as discussed within the Phase II ESA, there is potential for soils impacts related to the removal of the hydraulic lift and the exceedances of the Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact. The ECF, which serves as a special education school, is located at 5350 Machado Road, north of the Project Site directly across Machado Road. In addition, El Rincon Elementary School, located at 11177 Overland Avenue, is located approximately 0.20 miles east of the Project Site. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions.

As discussed in Response IX.b, there is potential for soils impacts related to the removal of the hydraulic lift and the exceedances of the RWQCB ESLs in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference

to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

Based on a review of the databases, as provided in the Phase I ESA, the Project Site was identified as EZ Lube LLC, Chevron #9-3666 (FORMER), Valvoline Instant Oil Change, and Savich Ben at 5380 Sepulveda Boulevard in the HAZNET, FINDS, RGA LUST, Los Angeles Co. HMS, AST, SWEEPS UST, HIST UST, CA FID UST, ECHO, EDR Hist Auto, RCRA-SQG, LUST, and HIST CORTESE environmental database reports. According to the listings, the Project Site was occupied by a gasoline service station between 1969 and 2014. There were no violations for the various HAZNET listings for the disposal of waste oil and other organic solids off-site. In addition, according to the SWEEPS UST listings, one 5,000-gallon fuel underground storage tank (UST), two 10,000-gallon fuel USTs, and one 1,000-gallon oil UST were located on the Project Site.

As discussed in Response IX.b, there is potential for impacts related to the removal of the hydraulic lift and the exceedances of the RWQCB ESLs in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 3.15 miles northwest and 3.5 miles south of the Project Site, respectively. Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area. No impacts would occur, and this issue need not be evaluated further in an EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. The Project Site is not located on an established disaster route. The nearest disaster route to the Project Site is Sepulveda Boulevard, beginning at the intersection of Sepulveda Boulevard and Culver Boulevard, located approximately 0.88 miles west of the Project Site.⁶ While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the Project would

⁶ County of Los Angeles Department of Public Works, Disaster Route Map, <https://dpw.lacounty.gov/dsq/DisasterRoutes/map/culver%20city.pdf>. Accessed September 3, 2020.

implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the Project would develop a Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for Project driveways) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area in the case of an emergency would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the Project Site would be provided at grade access from three driveways: one on Sepulveda Boulevard at Janisann Avenue and two on Machado Road. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for employees and visitors. Subject to review and approval of Project Site access and circulation plans by the Culver City Fire Department (CCFD), the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans in the case of an emergency. As such, the Project would not cause significant impediments along a designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of Culver City's emergency response plan. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

g. Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.⁷ The nearest very high fire hazard severity zone is located in Baldwin Hills, approximately 0.55 miles east of the Project Site. As the Project would involve redevelopment of an infill site within a highly urbanized area that is not proximate to wildlands or high fire hazard areas, no impacts would occur, and this issue need not be evaluated further in an EIR.

X. HYDROLOGY AND WATER QUALITY

The following impact analysis pertaining to the Project Site's underlying geology and soils is based on information contained in the Hydrology, Hydraulics, and SUSMP Report (Hydrology Report), prepared by Kimley-Horn & Associates, Inc., dated September 10, 2020, which is available for review at the Culver City Planning Division.

Would the Project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The Project Site is relatively flat and is approximately 32 to 35 feet above mean sea level. As discussed in the Hydrology Report, there are three existing drainage areas. They are described as follows: 1) in Drainage Area 1, runoff sheet flows to various inlets located in the Project Site's western portion at a slope of approximately one percent and the runoff is then routed to various parkway and curb drains and discharged to Sepulveda Boulevard's public storm drain system; 2) in Drainage Area 2, runoff sheet flows to

⁷ Culver City Fire Department, Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012, <https://www.culvercity.org/home/showdocument?id=164>. Accessed September 3, 2020.

various inlets located on the Project Site's eastern portion at a slope of approximately one percent and the runoff is then routed to various curb drains and discharged to Jefferson Boulevard's public storm drain system or the runoff sheet flows directly to the Jefferson Boulevard public storm drain system; and 3) in Drainage Area 3, runoff is predominately roof drain runoff that flows through a downspout system and sheet flows to the Machado Road public storm drain system or connects to a parkway drain and is charged to Machado Road.

Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The Project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The Project is proposing a mix of residential and commercial uses and does not propose any uses that would generate significant point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants cannot be traced to a specific original source. Non-point-source pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas;
- Oil, grease, and toxic chemicals from urban runoff and energy production;
- Sediment from improperly managed construction sites, crop and forest lands, and eroding stream banks;
- Salt from irrigation practices and acid drainage from abandoned mines;
- Bacteria and nutrients from livestock; pet wastes, and faulty septic systems; and
- Atmospheric deposition and hydro modification.

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

The Project would be subject to existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Best Management Practices (BMPs) to minimize pollutant runoff during the Project's construction period would be incorporated by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides.

As discussed under Response VII.a.iii, above, according to the Preliminary Geotechnical Report, groundwater was encountered during exploration at depths between 38 feet to 43 feet below the ground surface. According to the Seismic Hazard Zone Map of the Venice Quadrangle, the historic high groundwater level for the Project Site was approximately 9 feet below the surface. As such, construction activities, which would require excavations down to 20 feet below ground surface could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. Should the samples exceed the NPDES requirements, the developer must submit a Notice of Intent to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit.⁸ The treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, including sampling of groundwater that may be contaminated and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the Culver City Planning Division, Building Safety Division, and Department of Public Works prior to issuance of grading permit. Any removed groundwater that would exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies would be subject to a dewatering plan and would be treated and disposed of in compliance with applicable regulatory requirements. Therefore, compliance with applicable stormwater and groundwater requirements (LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES Construction General Permits) would ensure that impacts to water quality during the Project's construction activities would be less than significant.

With regard to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, the Project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. The preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The surface drainage would be relayed to these structures via roof drains. The Project would also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems such as a Continuous Deflective Separation (CDS) hydrodynamic separator. Once the required treatment volume is stored in the rainwater harvesting system, the excess water for a higher rain event would overflow to the existing storm drain system in the surrounding streets via a high flow bypass system prior to the storage device or internal bypass outlet. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas. As discussed in the Hydrology Report, the proposed storage volume of the rainwater harvesting system would be 10,081 cubic feet, which provides an excess storage of 719 cubic feet. The stormwater system would be subject to review and approval by the City to ensure that it would adequately comply with applicable water quality regulations.

Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The Project would not interfere with the implementation of NPDES water quality regulations and standards. Compliance with applicable SUSMP and long-term water quality

⁸ Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, September 13, 2018, http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf. Accessed September 3, 2020.

requirements would be reviewed by the Culver City Department of Public Works during the plan check phase of the Project. Compliance with applicable stormwater requirements would ensure that development of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a three single-story commercial buildings and associated surface parking. As stated in the Hydrology Report, 87 percent of the Project Site under existing conditions is impervious.⁹ As such, the Project Site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the Project does not propose to use groundwater or to development long-term groundwater production wells, which would lead to decreased groundwater supplies. Given the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be of an extent that would substantially alter groundwater supplies due to shallow depth of excavation and the lower groundwater levels, and the treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.. In addition, with development of the Project, impervious areas on the Project Site would be reduced to 80 percent, which would serve to promote groundwater recharge and improve the existing conditions. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Currently, the 3.43-acre area of the Project Site is currently 87 percent impervious and 13 percent pervious. No streams or rivers occur on-site. With development of the Project, impervious surfaces would be reduced to 80 percent and pervious surface would increase to 20 percent. Site-generated surface water runoff would continue to flow into the City's storm drain system following on-site treatment. Furthermore, the Project would include appropriate drainage improvements on Project Site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the City of Culver City's SUSMP follows closely to the Los Angeles County's Low Impact Development (LID) guidelines. The County LID manual states the following:

“All Designated Projects must retain 100 percent of the Stormwater Quality Design Volume (SWQDv) on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so.”

⁹ Kimley Horn and Associates, Inc., Hydrology, Hydraulics, and SUSMP Report, dated September 10, 2020, page 2.

As discussed under Response X.a, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The surface drainage would be relayed to these structures via roof drains. The Project will also consider a combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator. Once the required treatment volume is stored in the rainwater harvesting system, the excess water for a higher rain event would overflow to the existing storm drain system, in the surrounding streets via high flow bypass system prior to the storage device or internal bypass outlet. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas. As discussed in the Hydrology Report, the proposed storage volume of the rainwater harvesting system would be 10,800 cubic feet, which provides an excess storage of 719 cubic feet. The proposed drainage facilities would capture and treat the design storm for which the SWQDV is calculated, which for the Project Site is the 85th percentile. With the proposed drainage system in place, the existing off-site drainage patterns would be maintained.

With the Project Site entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. While the Project Site is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate because exposed soils could absorb rainfall that currently leaves the Project Site as surface flow. However, the construction period is temporary and compliance with applicable regulations discussed above would preclude fluctuations that result in flooding on-or off-site.

As discussed in Responses X.a and X.c.i, above, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The 3.43-acre are of the Project Site is currently 87 percent impervious and 13 percent pervious. As the Project would decrease impervious surfaces to 80 percent and increase pervious surfaces to 20 percent, the analysis provided in the Hydrology Report indicates that the overall runoff flow rate would decrease from 7.72 cubic feet per second in the existing condition to 6.64 cubic feet per second under the Project condition. Therefore, development of the Project, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the Project, overall existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the Project Site, as well as any connections to the existing system in the area. Furthermore, the Project would not alter the course of any stream or rivers. Because runoff would not significantly increase over existing conditions, and rain harvesting systems would be implemented to capture and treat runoff, the Project would not result in on- or off-site flooding. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in Response X.c.i, above, the 3.43-acre Project Site is currently 87 percent impervious and 13 percent pervious. As the Project would decrease impervious surfaces to 80 percent and increase pervious surfaces to 20 percent, the analysis provided in the Hydrology Report indicates that the overall runoff flow rate would decrease from 7.72 cubic feet per second in the existing condition to 6.64 cubic feet per second under the Project condition. Runoff will ultimately discharge to the existing Jefferson Boulevard storm drain system and be conveyed to the south, similar to existing conditions. As such, development of the Project not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, the proposed drainage facilities would capture drainage from the proposed roof drain system and catch basins/area drains and treat the design storm for which the SWQDv is calculated, which for the Project Site is the 85th percentile, within the proposed stormwater treatment system and associated overflow structure.¹⁰ Therefore, stormwater flows from the Project Site would not increase due to the Project. In terms of polluted runoff, the Project's proposed uses would be typical of residential and commercial uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. Moreover, the Project will also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planers, fossil filter inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator, which would serve to address any potential polluted runoff generated by the Project. Therefore, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system or provide substantial sources of polluted runoff. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. As discussed in Response X.c.i, above, impervious surface areas on the Project Site would be reduced from 87 percent impervious under the existing condition to 80 percent impervious under the Project. In addition, runoff from the Project Site would be directed to existing drainage facilities. Furthermore, the Project Site is mapped by the Federal Emergency Management Agency (FEMA) as located within an "Area of Minimal Flood Hazard".¹¹ The Project Site is also not located in a 100-year or 500-year flood zone as delineated by the City of Los Angeles or Culver City.¹² Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner which would impede or redirect flood flows. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Less Than Significant Impact. A seiche is an temporary disturbance or oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes.

¹⁰ Kimley Horn and Associates, Inc., Hydrology, Hydraulics, and SUSMP Report, dated September 10, 2020, page 3.

¹¹ FEMA Flood Map Service Center. FEMA Flood Map 06037C1760F, effective on 09/26/2008, <https://msc.fema.gov/portal/search?AddressQuery=11111%20Jefferson%20Boulevard%20Culver%20City#searchresultsanchor>. Accessed September 3, 2020.

¹² Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007, <https://www.culvercity.org/home/showdocument?id=126>. Accessed September 3, 2020.

As discussed in Response X.c.iv, the Project Site is mapped by FEMA as an “Area of Minimal Flood Hazard”. As such, the Project would have a less than significant impact related to risk of pollutants for a project within a flood hazard zone.

According to the Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles Venice Quadrangle, the Project Site is not located within mapped tsunami inundation boundaries.¹³ Therefore, the Project would not be subject to flooding hazards associated with tsunamis.

As provided in the Culver City Natural Hazards – Fire and Flooding Map, the Project Site is within the inundation area for the Mulholland Dam, Silverlake Dam, and the Stone Canyon Dam. Additionally, the Los Angeles County’s General Plan indicates that a large portion of Culver City, including the Project Site, is located within the potential inundation area.¹⁴ However, a breach of the dam facilities is very unlikely. The Project Site is located approximately 9.1 miles away from the Mulholland Dam/Stone Canyon Dam and 9.9 miles from the Silver Lake Dam with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the Project Site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Reservoir water, were it to reach the Project Site, would generally flow along roadways adjacent to or within the vicinity of the Project Site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

Based on the above, the Project would not release of pollutants due to Project inundation. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As required by Section 303(d) of the Clean Water Act, the State and the Regional Water Boards assess water quality data for California’s waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.¹⁵ The LARWQCB most recently prepared a list of impaired waterbodies in the region as part of the 2016 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The nearest water body to the Project Site that has been identified as an impaired water body is Ballona Creek Reach 2, located between National Boulevard and Centinela Avenue, approximately 0.75 miles west of the Project Site. Impairment for Ballona Creek Reach 2 include trash, toxic pollutants, bacteria, metals, and sediment.

As previously discussed, in terms of polluted runoff, the Project’s proposed uses would be typical of residential and commercial uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. Moreover, the Project will also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planers, fossil filter

¹³ Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles, Venice Quadrangle, dated March 1, 2009, https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami_Inundation_Venice_Quad_LosAngeles.pdf. Accessed September 3, 2020.

¹⁴ Los Angeles County General Plan, Safety Element, December 6, 1990, Plate 6 – Flood and Inundation Hazards, http://planning.lacounty.gov/assets/upl/project/gp_web80-tech-plates-01-to-08.pdf. Accessed September 3, 2020.

¹⁵ State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed September 3, 2020.

inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator, which would serve to address any potential polluted runoff generated by the Project. With implementation of the rainwater harvesting system and implementation of the pre-treatments, polluted runoff would be minimized under the Project Site and would provide an improvement in the surface water quality runoff as compared to the existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans for Ballona Creek Reach 2. No other water quality control plans or sustainable groundwater management plans would be affected by development of the Project. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XI. LAND USE AND PLANNING

Would the Project:

a. Physically divide an established community?

Less than Significant Impact. The Project Site is currently developed with three commercial buildings, including a United States Post Office, a Coco's Bakery Restaurant, and a Valvoline Instant Oil Change. The Project Site also currently includes associated surface parking and ornamental landscaping. The Project vicinity is highly urbanized and generally built out, is characterized by a blend of commercial, residential, restaurant, office, and includes a fully developed roadway system. As such, the Project would represent redevelopment and infill development of an already fully developed site, with some combination of residential, retail, market, and office uses, in keeping with the varied character of the surrounding area. Furthermore, the Project would not close any public streets or otherwise notably alter established infrastructure in the area. In fact, the Project would improve the Machado Road right-of-way adjacent to the current northern property boundary, develop the Machado Park to provide north-south connections through the Project Site and to link the Project Site's publicly accessible open space areas along Machado Road from Sepulveda Boulevard to Jefferson Boulevard. The Project would encourage multiple modes of travel by providing bicycle access from all three Project frontages and by providing bicycle racks for visitors at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level. Separate from the Project, the City intends to implement a bicycle share facility adjacent to the Machado Park. The bicycle share facility would allow for multimodal connections to the future proposed bike lanes along Jefferson Boulevard and Sepulveda Boulevard that are proposed as part of the City's Bicycle & Pedestrian Action Plan. Lastly, the Project would provide improved pedestrian environment and circulation by including publicly accessible open space and landscaped pedestrian corridors that provide pedestrian access through the Project Site, streetscape improvements along all street frontages, and other amenities which would increase access through/along the Project Site and encourage community use of the Project Site. For all these reasons, the Project would not physically divide an established community, the impact would be less than significant, and this issue need not be evaluated further in an EIR.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project proposes a Zone Change from CG and R-1 to Planned Development (PD) and General Plan Amendment. A Comprehensive Plan is proposed as the overarching entitlement mechanism for the Project Site. Per Section 17.560 of the CCMC, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site

planning and design and to support more effective responses to the settings of such properties and other environmental considerations. Furthermore, as described in Attachment A, Project Description, Table 1, Development Program Summary, the Project would consist of 230 residential units; 38,600 sf of market; 10,600 sf of restaurants and café, 11,450 sf of office, 3,900 sf of retail, and 1,950 sf gym/fitness uses. Therefore, the Project would increase the height, density, and configuration of development at the Project Site, which could potentially conflict with City land use plans, polices, and regulations adopted for the purpose of avoiding or mitigating environmental effects. Therefore, it is recommended that this topic be evaluated further in an EIR.

XII. MINERAL RESOURCES

Would the Project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact (a–b). Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans.

The Inglewood Oil Field (Oil Field) is located within the City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within the City. The Oil Field is located approximately 0.90 miles northeast of the Project Site. The Project Site is located in a highly urbanized area of the City and is currently developed with three single-story commercial buildings and associated asphalt-paved surface parking lot. As such, the potential of uncovering mineral resources during Project construction is considered low. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents nor would it result in the loss of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral resources or mineral resource recovery sites on or near the Project Site. No impact would occur, and this issue need not be evaluated further in an EIR.

XIII. NOISE

Would the Project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Impact. Existing land uses in the Project vicinity include: nearby residential uses within the Heritage Park and Sunkist Park neighborhoods, Studio Village Townhomes, a private school K-12 (Exceptional Children’s Foundation [ECF]), the Studio Village Shopping Center, and Temple Akiba. Construction of the Project could require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, loading and unloading of trucks, parking area noise (e.g., car alarms, slamming of car doors, etc.), and the

carrying out of outdoor activities and special events (if any). Therefore, construction and operation of the Project could generate a temporary or permanent increase in ambient noise levels in excess of applicable standards for nearby residential, hotel, and park/mortuary uses, which are considered noise-sensitive uses. Therefore, it is recommended that this issue be evaluated further in an EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and groundborne noise due to Project Site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile driving. As such, the Project would have the potential to generate excessive groundborne vibration and groundborne noise levels during short-term construction activities. Therefore, vibration monitoring and other actions may be warranted to reduce any potential groundborne vibration and groundborne noise effects. It is recommended that this topic be further analyzed in an EIR.

Operation of the Project could potentially generate groundborne vibration or groundborne noise at levels beyond those which currently occur under the three existing buildings if increased numbers of trucks would travel to, from, and within the Project Site. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. For a Project located within the vicinity of a private air strip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 3.15 miles northwest and 3.5 miles south of the Project Site, respectively. Therefore, the Project would not expose people to excessive noise levels from such uses and no impact would occur, and this issue need not be evaluated further in an EIR.

XIV. POPULATION AND HOUSING

Would the Project:

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Potentially Significant Impact. The Project would replace the existing commercial buildings with 230 residential units and 66,500 sf of commercial uses, including a market, gym, retail/restaurant uses and office uses. The Project proposes a General Plan Amendment, a Zone Change/Map Amendment and Comprehensive Plan. Therefore, the potential population growth that could occur will be evaluated further in an EIR.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with three commercial buildings with no residential uses on-site. As such, Project implementation would not displace existing people or housing. Therefore, no impact would occur to local populations or existing housing such that the construction of replacement housing would be necessary, and this issue need not be evaluated further in an EIR.

XV. PUBLIC SERVICES

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

Potentially Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the CCFD. Construction activities associated with the Project could temporarily increase the demand for fire protection and emergency medical services, and could potentially involve temporary lane closures and construction traffic that slows emergency response in the Studio Village neighborhood. Project operation would increase the density of development and include some combination of residential, retail, and office uses, resulting in an increase of on-site population that would increase the demand for fire protection and emergency medical services from CCFD. Therefore, it is recommended that this topic be evaluated further in an EIR.

ii. Police Protection?

Potentially Significant Impact. Police protection services for the Project Site are provided by the Culver City Police Department (CCPD). Construction activities associated with the Project could temporarily increase the demand for police protection services to respond to calls associated with theft, graffiti, vandalism and trespassing. Project operation would increase the density of development and include a some combination of residential, retail, and office uses, resulting in an increase of on-site population that would increase the demand for police protection services from CCPD. Therefore, it is recommended that this topic be evaluated further in an EIR.

iii. Schools?

Less than Significant Impact. The Project would be served by the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The Project Site is located within the attendance boundaries of El Rincon Elementary School, Culver City Middle School, and Culver City High School. El Rincon Elementary School is located at 11177 Overland Ave, approximately 0.20 miles to the east of the Project Site. Culver City Middle School is located at 4601 Elenda Street, approximately 0.60 miles north of the Project Site. Culver City High School is located at 4401 Elenda Street, approximately 0.68 miles northwest of the Project Site.

Project construction would create temporary construction jobs, but construction workers would be drawn from an existing work pool and would work at the Project Site for only short durations. There would be no student population associated with Project construction.

Project operation would incrementally increase demand for school services. The Project includes some combination of residential, retail, and office uses, which would increase population to the Project area, both directly and indirectly, in the form of new residents and employees. If Project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a minor increase in the student population in the nearby schools.

The 230 residential units are estimated to generate a new student population of approximately 38 elementary school students, 11 middle school students, and 22 high school students for a total of 71 students.¹⁶ The 66,500 sf of commercial uses on the Project Site would also generate students in the event new employees with school-aged children move into the area. The commercial units are estimated to generate an additional student population of 2 elementary school students, 2 middle school students, and 2 high school students for a total of 6 students.¹⁷

Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of these fees is deemed to constitute full and complete mitigation for impacts to school facilities. Therefore, impacts on school services and facilities would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Parks?

Less than Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility.¹⁸ A joint-use partnership between the City and CCUSD provides additional open space and park facilities for use by residents of the City during non-school hours. The Project Site is located within the vicinity of three park facilities. **Table B-1, *Culver City Park Facilities Located in the Vicinity of the Project Site***, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the Project Site.

Project operation would incrementally increase demand for park services. The Project's new residents would be expected to use the local parks. Pursuant to CCMC Section 17.400.065, each residential unit should have a minimum of 75 sf of common and/or private open space. Based on that requirement, the Project would be required to provide a minimum of 17,250 sf of common and/or private open space. The Project would provide approximately 30,000 sf of publicly accessible open space in the form of a 15,000 sf Machado Park, 13,000 sf Paseo Courtyard, and 2,000 sf Entry Courtyard. The Project would also provide a total of approximately 24,000 sf of residential common open space within a courtyard and a 2,500 sf amenity room on the third level. The amenities available to Project residents on the third floor would include a pool and sun deck on the southern residential courtyard, a fitness center, BBQ area, conference room/business center, and storage facilities in the residential leasing office and parking garage.

¹⁶ Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multifamily residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303.

¹⁷ Student generation for non-residential uses are taken from the Commercial/Industrial Development School Fee Justification Study 2010, LAUSD, September 2010 which provides the most recent data available for non-residential uses. Based on the rate for retail and services uses (which is applied for the Project for all commercial uses excluding the offices): Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. For the offices, the office generation rate was used: Elementary = 0.0278; Middle School = 0.0139; High School = 0.0173.

¹⁸ City of Culver City, Culver City Parks, <https://www.culvercity.org/live/community-neighborhood/parks-recreation-culture/culver-city-parks>. Accessed September 3, 2020.

**Table B-1
 Culver City Park Facilities Located in the Vicinity of the Project Site**

Park/Facility	Location	Size (acres)	Parks Amenities/Activities	Approximate Distance/Direction from Project Site^a
El Marino Park	5301 Berryman Avenue	3.15	After school program, barbeques, child care, basketball courts, handball walls, kitchen areas, open picnic areas, playground, recreation building with room rentals, multi-purpose sports field, softball field	0.32 miles southwest
Blanco Park	5801 Sawtelle Boulevard	3.26	After school program, barbeques, child care, basketball courts, parcourse equipment, covered and open picnic areas, playgrounds, multi-purpose sports field, softball field	0.14 miles east
Lingberg Park	5041 Rhoda Way	4.39	After school program, barbeques, child care, basketball courts, tennis courts, kitchen areas, parcourse equipment, cover picnic area, playground, recreation building with room rentals, multi-purpose sports field, softball field	0.29 miles northwest

a Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

Source: Culver City, Culver City Parks, <https://www.culvercity.org/enjoy/things-to-do/parks-recreation/culver-city-parks>. Accessed September 3, 2020.

Although the Project would exceed the open space requirements, to address potential impacts related to parks the Applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to Culver City’s standard conditions of approval and pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC, as applicable. Therefore, with the proposed open space features and payment of applicable fees, Project demand on recreational facilities would be offset. Accordingly, the Project would not have a have a significant physical impact upon parks and impacts would be less than significant, and this issue need not be evaluated further in an EIR.

v. Other public facilities?

Less than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to Culver City. The Project Site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 0.69 miles north of the Project Site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, View Park Bebe Moore Campbell Library, and Lennox Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 2.8 miles southwest of the Project Site. The View Park Bebe Moore Campbell Library is located at 3854 West 54th Street, Los Angeles, approximately 3.2 miles east of the Project Site. The Lennox Library is located at 4359 Lennox Boulevard, Lennox, approximately 4.8 miles southeast of the Project Site.

The Project would directly increase the residential population of Culver City and would, therefore, increase demand for library facilities and services. To address potential impacts to libraries, the Project applicant would

pay the required fees per the Developer Fee Program for the LACPL as provided in Los Angeles County, Code of Ordinances, Title 22: Planning and Zoning, Division 2: Additional Regulations, Chapter 22.72: Library Facilities Mitigation Fee. Compliance would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service resulting from the Project by payment of development fees per the Los Angeles County Code. As such, impacts regarding library services would be less than significant.

The Project's residents and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, implementation of the Project would result in a minimal population increase compared to the City's population. Therefore, development of the Project would not significantly increase the use of government services beyond current levels. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. The Applicant would need to pay all applicable impact fees of the City. Overall, less than significant impacts to governmental services, including roads, would occur, and this issue need not be evaluated further in an EIR.

XVI. RECREATION

- a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact (a-b). As discussed under Response XV.d, operational activities associated with the Project would increase demand for park services. However, the Project would include the Machado Park, a gym facility and pool for resident use and other open space amenities that would reduce demand for park services, in addition to meeting parkland dedication or fee requirements, as discussed above in Checklist Question XV.iv. Therefore, with the proposed open space features and dedication or payment of parkland fees, the Project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XVII. TRANSPORTATION

Would the Project:

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

Potentially Significant Impact. The Project Site is currently developed with three single-story buildings, associated surface parking, and ornamental landscaping. The Project would replace this development with 230 residential units and 66,500 sf of commercial uses (e.g., retail, restaurant, gym, and office), which would increase the on-site population and associated vehicular, bicycle, and pedestrian traffic in the Studio Village neighborhood as well as increase transit demand. Project construction would also result in a temporary increase in traffic in the Project area as the result of construction-related truck trips and worker vehicle trips, and could necessitate temporary construction-related lane closures and impede vehicular, bicycle, and pedestrian access in the Project vicinity.

The Project Site is located in an area well served by public transportation, including the Culver City Bus and Los Angeles County Metropolitan Transportation Authority (Metro), which provide an extensive system of bus lines in Culver City and links to the larger metropolitan area. Although the Project Site is well served by public transportation, and would also improve pedestrian access and include bicycle facilities and improvements, it would have potential to impact vehicular, bicycle, pedestrian, and public transportation networks during construction and operation. Therefore, it is recommended that consistency with applicable programs, plans, ordinances, and policies, such as the Bicycle and Pedestrian Action Plan and the Culver City General Plan, addressing the circulation system be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. As stated in Response XVII.a, development of the Project would generate additional traffic. Per CEQA Guidelines, Section 15064.3(b), the Project's transportation impacts will be evaluated in an EIR based on vehicle miles traveled analysis. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

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

Potentially Significant Impact. The Project would redevelop the area along Machado Road, to support new park and landscaped areas and multimodal circulation. In addition, the Project would install a new signal at the intersection of Janisann Avenue and Sepulveda Boulevard may increase hazards due to geometric design features or incompatible uses. Therefore, it is recommended that this issue be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

d. Result in inadequate emergency access?

Potentially Significant Impact. Emergency access to the Project Site is currently provided along the three frontages of the Project Site. The Project could result in modification to emergency access to the Project Site by modifying the access points to the Project Site. Also, while it is expected that the majority of Project construction activities would occur on-site, short-term construction activities may temporarily affect emergency access on segments of adjacent streets during certain periods of the day. Therefore, it is recommended that the potential for Project impacts on emergency vehicle access related to construction activities and closures, proposed permanent changes in Project Site access and circulation, and Project-related increases in trip generation be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

XVIII. TRIBAL CULTURAL RESOURCES

- a. **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or**
- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Potentially Significant Impact. AB 52 establishes a formal consultation process for California Native American Tribes to identify potentially significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074, as part of CEQA. As specified in Public Resources Code Section 21080.3.1 (d), within 14 days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Should any information be gained during the consultation process, it would be used to analyze impacts to tribal cultural resources in the EIR. Therefore, it is recommended that this topic be evaluated further in an EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

The following impact analysis pertaining to the Project Site's utilities and service systems is based on information contained in the Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities (Utility Report), prepared by Kimley-Horn & Associates, Inc., dated September 10, 2020, which is available for review at the Culver City Planning Division.

Would the Project:

- a. **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Water

Less Than Significant Impact. During construction activities associated with the future development within the Project Site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

Existing water lines are operated by the water purveyor Golden State Water Company (GSWC). There is an existing 12-inch water line along Sepulveda Boulevard, an existing 12-inch line along Jefferson Boulevard, and an existing 12-inch water line along Machado Road. With regard to fire infrastructure, there are existing fire water service serving the Project Site from Sepulveda Boulevard and Jefferson Boulevard. Additionally, there are two public fire hydrants along the Project Site frontage: one at the intersection of Sepulveda Boulevard and Jefferson Boulevard, and one at the intersection of Sepulveda Boulevard and Machado Road. There are water meters serving the existing buildings on the Project Site on the three frontages.

The Project would require new construction of water service lines to serve the proposed Project. Installation of new water infrastructure would include on-site water distribution improvements, off-site work associated with connections to the public main, new fire hydrants, and upgrades as required by GSWC and the CCFD. Prior to ground disturbance, Project contractors would coordinate with GSWC to identify the locations and depths of all lines. GSWC would be notified in advance of proposed ground disturbance activities to avoid water lines and minimize disruption of water service. A Construction Management Plan would be implemented to reduce temporary pedestrian and traffic impacts, and to ensure emergency vehicle access throughout the construction period.

The Project would propose domestic and fire water connections to the existing 12-inch water mains in both Sepulveda Boulevard and Machado Road. Fire flows have been calculated by the Fire Prevention Bureau of the CCFD, and as provided in Exhibit 6 of the Utility Report, there is available water pressure for the Project. The Project’s plumbing engineer and/or fire service consultant would assess the Project water/fire service design requirements based on the preliminary pressure information provided by GSWC and CCFD. The Project would be required to comply with all CCFD and GSWC requirements.

GSWC purchases water from the West Basin Municipal Water District (WBMWD). The 2015 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments from 2020 through 2040, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2020 WBMWD water demand is 146,105 acre-feet per year (afy) while projected year 2040 water demand is 151,922 afy; refer to **Table B-2, Projected West Basin Service Area Water Demand (afy)**.

Table B-2
Projected West Basin Service Area Water Demand (afy)

Year	2020	2025	2030	2035	2040
Baseline Demand ^a	135,719	136,447	136,466	136,706	136,284
Planned Conservation ^a	32,280	35,190	37,928	40,255	42,773
Final Total Retail Demand	167,999	171,637	174,394	176,961	179,057
Recycled Water Demand ^b	21,894	27,135	27,135	27,135	27,135
Final Potable Demand	146,105	144,502	147,259	149,826	151,922

a Projections based on Metropolitan Demand Forecasting Model.

b Projections based on the Capital Improvement Plan, 2015, (excludes replenishment deliveries to the Barrier and deliveries outside service area).

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-1: Projected West Basin Service Area Retail Demand (AFY).

According to the water supply section of the UWMP, Year 2020 WBMWD water supply is 189,893 afy while projected 2040 water supply is 206,192 afy; refer to **Table B-3, Projected West Basin Service Area Water Supply (afy)**. Year 2020 has a water supply surplus of 43,788 afy while projected year 2040 has a projected water supply surplus of 54,270 afy. The WBMWD is projecting to increase current recycled water supplies as well as invest in over 20,000 afy of ocean-water desalination supply. Coupled with additional conserved water supply through water use efficiency programs, the overall imported water use is expected to be reduced significantly by 2040. According to the UWMP, the water supplies available to the WBMWD in single dry and multiple dry years, will be sufficient to meet all present and future water supply requirements within the WBMWD’s service area for at least the next 20 years.

Table B-3
Projected West Basin Service Area Water Supply (afy)

Year	2020	2025	2030	2035	2040
Groundwater ^a	36,293	36,293	36,293	36,293	36,293
Imported Water ^b	98,426	77,654	77,673	77,913	77,491
Recycled Water ^c	21,894	27,135	27,135	27,135	27,135
Desalination ^d	1,000	22,500	22,500	22,500	22,500
Total	157,613	163,582	163,601	163,841	163,419
Conservation ^e	32,280	35,190	37,928	40,255	42,773
Total	189,893	198,772	201,529	204,096	206,192

a Groundwater production within West Basin service area only.
 b Imported retail use only; does not include replenishment deliveries (i.e., Barrier).
 c Recycled water does not include replenishment deliveries (i.e., Barrier) and deliveries outside the service area.
 d Desalination include both brackish and ocean water.
 e Conservation consistent of Active and Passive Savings according to Metropolitan’s projected estimates.
 Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-3: West Basin’s Service Area Projected Retail Water Supplies (AFY).

As shown in **Table B-4, Estimated Operational Water Consumption**, the Project would result in an estimated net total peak water demand of 47,356 gpd (approximately 53.08 afy) when fully occupied. The Project’s estimated water demand does not include potential credit for the existing use and existing water demand on the Project Site, which would further reduce the demand. The estimated 53.08 afy water demand generated by the Project would constitute less than one percent of the WBMWDW year 2020 for both water supply and water demand. The Project would also comply with Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the CCMC, with regards to conservation. In addition, the Project would comply with the City’s mandatory green building requirements. The Project would also comply with the WBMWD UWMP recommendations regarding drought management and water conservation.

Therefore, based on the above, the Project’s water consumption would be significantly below the projected supply and demand, and implementation of the Project is not expected to measurably reduce the local infrastructure’s capacity. No new or expanded water treatment facilities would be required. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Table B-4
Estimated Operational Water Consumption

Land Use	Units	Consumption Rate (gpd) ^a	Total Water Consumption (gpd)
Existing Uses			
Institutional	27,225 sf	100/1,000 sf	2,723
Restaurant	6,064 sf	1,000/1,000 sf	6,064
Commercial	1,722 sf	100/1,000 sf	172
<i>Total Existing Water Demand</i>			8,959
Proposed Uses			
Residential	230 units	156/unit	35,880
Grocery/Market	38,600 sf	150/1,000 sf	5,790
Restaurant and Café	10,600 sf	1,000/1,000 sf	10,600
Office	11,450 sf	200/1,000 sf	2,290
Retail	3,900 sf	150/1,000 sf	585
Gym	1,950 sf	600/1,000 sf	1,170
<i>Total Proposed Water Demand</i>			56,315
<i>Net Increase in Water Demand (Proposed – Existing)</i>			47,356

a Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors for residential and commercial categories, plus water consumption generated by proposed irrigation for landscape and pool areas.

Source: Kimley-Horn & Associates, Inc., *Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities*, dated September 10, 2020.

Wastewater

Less Than Significant Impact. The City’s wastewater is sent to Mesmer Pump Station and then treated at the Hyperion Water Reclamation Plant (HWRP), which treats an average daily flow of approximately 275 million gallons per day (mgd), with the capacity to treat up to 450 mgd. Therefore, the HWRP has a remaining treatment capacity of approximately 175 mgd.

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur, approximately 28 months. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is therefore anticipated to result in either no or negligible discharges to the City’s wastewater treatment conveyance systems or treatment facilities, and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. Such minimal wastewater flows are not expected to exceed to applicable treatment requirements of the Hyperion Water Reclamation Plant, and such wastewater would be treated prior to discharge if discharged within the City. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

As shown in **Table B-5, Estimated Operational Wastewater Generation**, implementation of the Project would generate approximately 47,356 gpd (approximately .047 mgd) of wastewater. The Project’s wastewater generation would represent less than one percent of the capacity available at the HWRP. Therefore, Project impacts on wastewater treatment facilities would be less than significant.

**Table B-5
 Estimated Operational Wastewater Generation**

Land Use	Units	Wastewater Generation Rate (gpd) ^a	Total Wastewater Generation (gpd)
Existing Uses			
Institutional	27,225 sf	100/1,000 sf	2,723
Restaurant	6,064 sf	1,000/1,000 sf	6,064
Commercial	1,722 sf	100/1,000 sf	172
<i>Total Existing Wastewater Generation</i>			8,959
Proposed Uses			
Residential	230 units	156/unit	35,880
Grocery/Market	38,600 sf	150/1,000 sf	5,790
Restaurant and Café	10,600 sf	1,000/1,000 sf	10,600
Office	11,450 sf	200/1,000 sf	2,290
Retail	3,900 sf	150/1,000 sf	585
Gym	1,950 sf	600/1,000 sf	1,170
<i>Total Proposed Wastewater Generation</i>			56,315
<i>Net Increase in Wastewater Generation (Proposed – Existing)</i>			47,356

a Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors for residential and commercial categories, plus water consumption generated by proposed irrigation for landscape and pool areas.

Source: Kimley-Horn & Associates, Inc., *Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities*, dated September 10, 2020.

The Project proposes several sewer lateral connections to the existing sewer mains on Jefferson Boulevard and Machado Road. There available capacity in the sewer lines, and therefore, no new lines would be developed to serve the Project. Thus, construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system based on the City requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary, on an intermittent basis.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Stormwater Drainage

Less Than Significant Impact. As discussed in detail in Response X.c.ii, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. Implementation of the Project, overall existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the Project Site, as well as any connections to the existing system in the area. It is also acknowledged that there are no known deficiencies in the existing storm drain system. Impacts associated with on-site stormwater drainage facilities would be less than significant. Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded stormwater

drainage facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Electric Power and Natural Gas

Less Than Significant Impact. The Project Site is located in a developed and urbanized area in the City that is served by existing electrical power and natural gas services. Electricity would be provided by Southern California Edison (SCE), and natural gas would be supplied by SoCalGas. As discussed in Responses VI.a and VI.b, the Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with electricity, natural gas and transportation fuel.

With regard to existing electrical distribution lines, the Project would be required to coordinate electrical infrastructure removals or relocations with SCE and comply with site-specific requirements set forth by SCE, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within SCE easements would be minimized.

Project construction would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that extensive off-site infrastructure improvements would not be needed to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be limited to shallow grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded electric power or natural gas facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Telecommunications

Less Than Significant Impact. The Project Site is located in a developed and urbanized area in the City that is served by existing telecommunication services. The Project would require installation of new underground telecommunication lines (for internet, telephone, and other services) to serve the residential and commercial uses proposed on the Project Site. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. As telecommunication providers already deliver their services to a large number of homes in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. As described in Response XIX.a, above, the Project would fall within the 2015 WBMWD UWMP available and projected water supplies. According to the UWMP, the water supplies available in single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the applicable service areas for at least the next 20 years, including the Project. As a result, the Project is within the capacity of the GSWC to serve the Project as well as existing and planned future water demands of its service area.

Sections 10910-10915 of the State Water Code (Senate Bill 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. The Project would not meet any of the aforementioned thresholds. A typical 500 unit subdivision would typically consume 0.3 to 0.5 acre-feet of water per year per unit, or approximately 150 to 250 afy, depending upon several factors, including the regional climate.¹⁹ As discussed under Response XIX.a, the Project would generate a water demand of approximately 53.08 afy (without accounting for water conservation features or subtracting existing on-site water demand). With implementation of water conservation measures per the requirements cited above, the Project's actual water demand would be well below the conservative amount stated above and would not require preparation of a WSA. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in the Response XIX.a, implementation of the Project would generate a peak demand of 47,356 gpd (0.047 mgd) of wastewater. The HWRP has a remaining treatment capacity of approximately 175 mgd. Given the current capacity of the HWRP, Project wastewater generation would account for a less than one percent increase in demand at the HWRP and there would be ample capacity to treat this increase. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste which includes, trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. Both recyclables and organics are hauled to private processing facilities to recycle or compost material. Solid waste is disposed of in either a County or non-County landfill. Culver City operates a transfer station but, does not own or operate any landfill, recycling or composting facilities

Construction of the Project would result in generation of construction and demolition debris such as metal scrap, lumber, concrete which will be collected and diverted to a construction and demolition debris facility for materials to be recycled and /or discarded. It is anticipated that a large amount of the construction debris would be recycled.

¹⁹ Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001, prepared by California Department of Water Resources, 2003.

Residual wastes such as trash packing materials, and plastics which could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City’s standard conditions of approval specifically require the following:

“Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility or organization accepting the materials.”

In addition, the Project would comply with Title 5: Public Works, Chapter 5.01: Solid Waste Management, of the CCMC (as required by Culver City’s conditions of approval). According to the CCMC, the Project Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the Project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during construction.

The remaining disposal capacity for the County’s Class III landfills is estimated at approximately 163.39 million tons as of December 31, 2019, the most recent data available.²⁰ In addition to in-County landfills, out-of County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County’s landfills, and based on the Los Angeles County Integrated Waste Management Plan (CoIWMP), the County anticipates that future Class III disposal needs can be adequately met through 2033 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

As illustrated in **Table B-6, *Projected Solid Waste Generated During Operation***, and based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate a net of approximately 2,323 lbs/day of solid waste or 424 tons per year (tpy). The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 163.39 million tons of remaining disposal capacity for the County’s Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County’s available regional landfills.

CalRecycle is the California State Agency that promotes the importance of reducing waste and oversees California’s waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the Project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City’s implementation of solid waste diversion targets. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during operation. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

²⁰ County of Los Angeles, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019, page 32, <https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>. Accessed September 3, 2020.

**Table B-6
 Projected Solid Waste Generated During Operation**

Land Uses	Quantity	Factor ^a	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Office	27,225 sf	6 lbs/1,000 sf/day	163	0.0817	30
Restaurant	6,064 sf	0.05 lbs/sf/day	303	0.1516	55
Commercial	1,722 sf	2.5 lbs/100 sf/day	43	0.0215	8
		Total	510	0.2548	93
Proposed Land Uses					
Residential	230 du	4 lbs/du/day	920	0.4600	168
Market	38,600 sf	3.12 lb/100 sf/day	1,204	0.6022	220
Restaurant	10,600 sf	0.05 lbs/sf/day	530	0.2650	97
Office	11,450 sf	6 lbs/1,000 sf/day	69	0.0344	13
Retail	3,900 sf	2.5 lbs/100 sf/day	98	0.0488	18
Gym	1,950 sf	6 lbs/1,000 sf/day	12	0.0059	2
		Total	2,832	1.4161	517
Net Increase (Proposed - Existing)			2,323	1.1613	424

sf = square feet; lbs. = pounds; du = dwelling units.

a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed September 3, 2020.

Source: ESA, 2020.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City, are required under AB 939, the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City’s solid waste exceeds the target, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The Project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?**
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact (a-d). As discussed in Response IX.g, the Project Site is not located in or near a VHFHSZ. In addition, the Project Site is not located in or near a State Responsibility Area.²¹ The Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risk. The Project would be the redevelopment of an infill site within an urbanized area. Therefore, no impacts related to wildfires are anticipated, and this issue need not be evaluated further in an EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- a. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. As discussed throughout this Initial Study, the Project would have the potential to degrade the quality of the environment in terms of the following environmental topics: Air Quality, Cultural Resources (historic resources and archaeological resources), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise (all except airport noise), Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. It is recommended that Project impacts for the above topics be evaluated further in an EIR.

²¹ California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, http://www.fire.ca.gov/firepreventionfee/srviewer_launch. Accessed September 3, 2020.

As discussed in Response IV, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endanger plant or animal.

As discussed in Responses V and VII.f, the Project could potentially adversely affect examples of California history and prehistory (archaeological and paleontological resources). Therefore, it is recommended that Project impacts on historic, archaeological, and paleontological resources be evaluated further in an EIR.

b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. Environmental topics for which the determinations in this Initial Study were “No Impact” or “Less Than Significant Impact” have been determined not to have the potential for significant cumulative impacts as the Project would not contribute considerably to cumulative impacts in terms of these topics. These topics include: Aesthetics, Agricultural and Forestry Resources, Air Quality (odors), Biological Resources, Cultural Resources (human remains), Geology and Soils (all except paleontological resources), Hazards and Hazardous Materials (routine transport, use, or disposal of hazardous materials; airport hazards and noise; emergency response plan; and wildland fires), Hydrology and Water Quality, Land Use and Planning (physically divide an established community), Mineral Resources, Noise (aircraft noise), Population and Housing (displacement), Public Services (schools, parks, and libraries), Recreation, Utilities and Service Systems, and Wildfire. The cumulative impacts of the Project in terms of these topics need not be evaluated further in an EIR.

Environmental topics for which the determination in this Initial Study is “Potentially Significant Impact” have been determined to have the potential for significant cumulative impacts as the Project could potentially contribute considerably to cumulative impacts in terms of these topics. These topics include: Air Quality (all except odors), Cultural Resources (all except human remains), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise (all except aircraft noise), Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. It is recommended that the potential cumulative impacts of the Project related to these topics be evaluated further in an EIR.

c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed throughout this Initial Study, the Project could result in potentially significant environmental impacts in terms of the following environmental topics: Air Quality, Cultural Resources (historic resources and archaeological resources), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise, Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. These impacts could have potentially adverse effects on human beings, and it is therefore recommended that these topics be evaluated further in an EIR.

Appendix A-3
Scoping Meeting Materials

EIR SCOPING MEETING

11111 Jefferson Boulevard Mixed-Use Project

October 6, 2020

7:00 p.m. – 8:00 p.m.



EIR Scoping Meeting Objectives

- Provide information about the 11111 Jefferson Boulevard Mixed-Use Project
- Provide information on Environmental Impact Report (EIR) process
- Identify environmental issues for analysis in EIR
- Solicit community input on environmental issues or concerns to be addressed in EIR

The EIR Scoping Meeting is for community input only. The City is at the beginning of the environmental review process.



Project Site and Vicinity

- 3.43-acres (149,553 square feet)
- Bounded by Jefferson Boulevard on the east, Machado Road on the north, and Sepulveda Boulevard on the west
- Primary regional access provided by the I-405 and SR-90



Existing Conditions

- Project Site is made up of 4 parcels from north to south
- Off-site parking for the Exceptional Children’s Foundation (ECF) School
- United States Post Office
- Coco’s Bakery Casual Restaurant
- Valvoline Instant Oil Change
- Surface parking lots serving all uses on-site



Project Description

- 230 residential dwelling units
- 66,500 sf of commercial space (market, restaurant, retail, office, gym)
- 70,060 sf open space
 - 30,000 sf publicly accessible open space
 - 24,000 sf residential courtyard
 - 13,560 sf private open space
- New signal at intersection of Janisann Avenue and Sepulveda Boulevard
- Proposed relocation of two bus stops on Sepulveda Boulevard
- 653 vehicular parking spaces
- 71 long- and 26 short-term bicycle spaces



Conceptual Site Plan

- ① Third Level Amenity Courtyard (24,000 sf)
- ② Second Level Retail Parking Trellis
- ③ Ground Level Public Open Space (30,000 sf)
Machado Park
Paseo Courtyard
Entry Courtyard
- ④ Residential Drop-Off
- ⑤ Proposed Signal
- Bike Parking
- Project Site Boundary



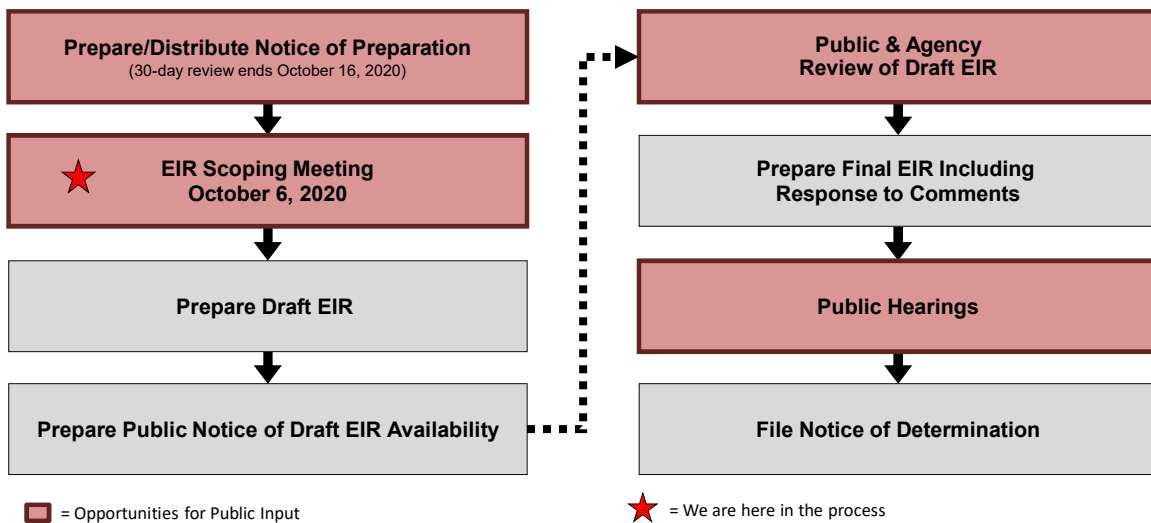
California Environmental Quality Act (CEQA)

Purpose of CEQA Review:

- To inform decision-makers and the public of a project's potential environmental effects
- Increases public understanding of and participation in environmental review process
- Discloses potential impacts on the environment
- Identifies ways to avoid or reduce potential environmental impacts through mitigation measures or alternatives



The EIR Process



EIR Scope and Content

Topics Found to be Less Than Significant – Not Evaluated in the EIR

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Geology and Soils
(excluding Paleontological Resources)
- Hydrology and Water Quality
- Mineral Resources
- Public Services
(Schools, Parks)
- Recreation
- Utilities and Service Systems
(Wastewater, Water Supply, Solid Waste, Telecommunications)

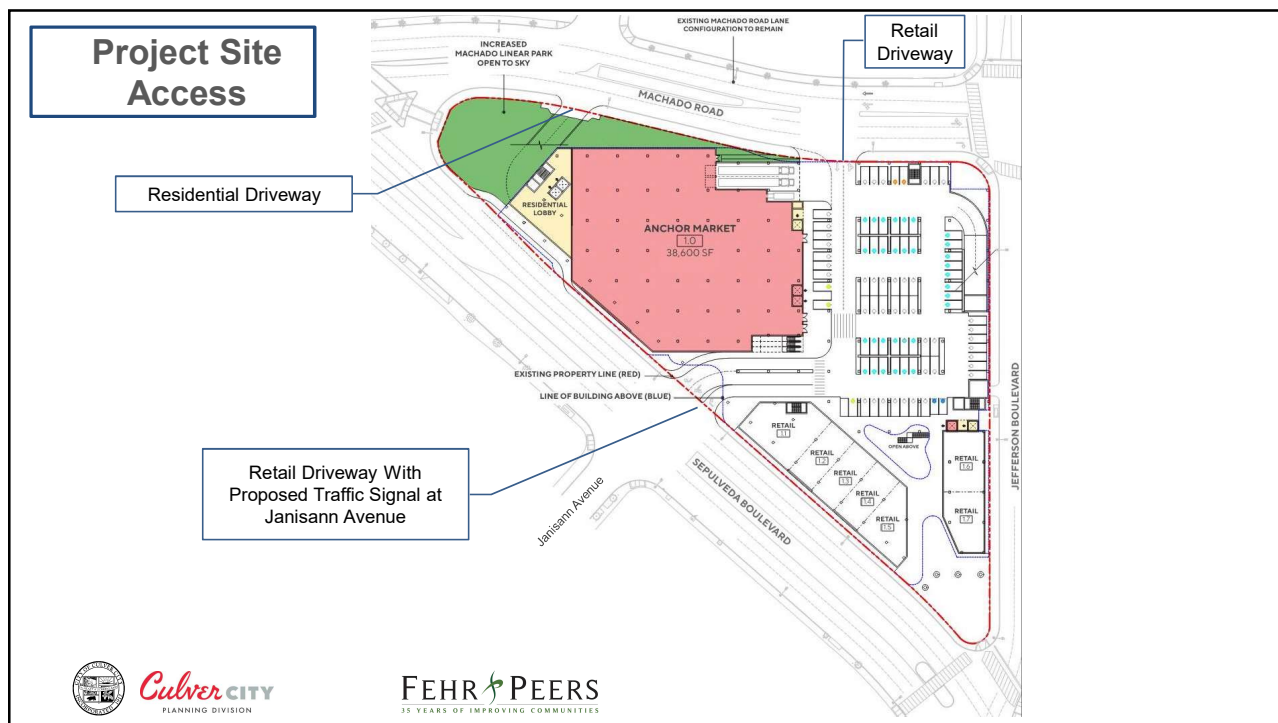
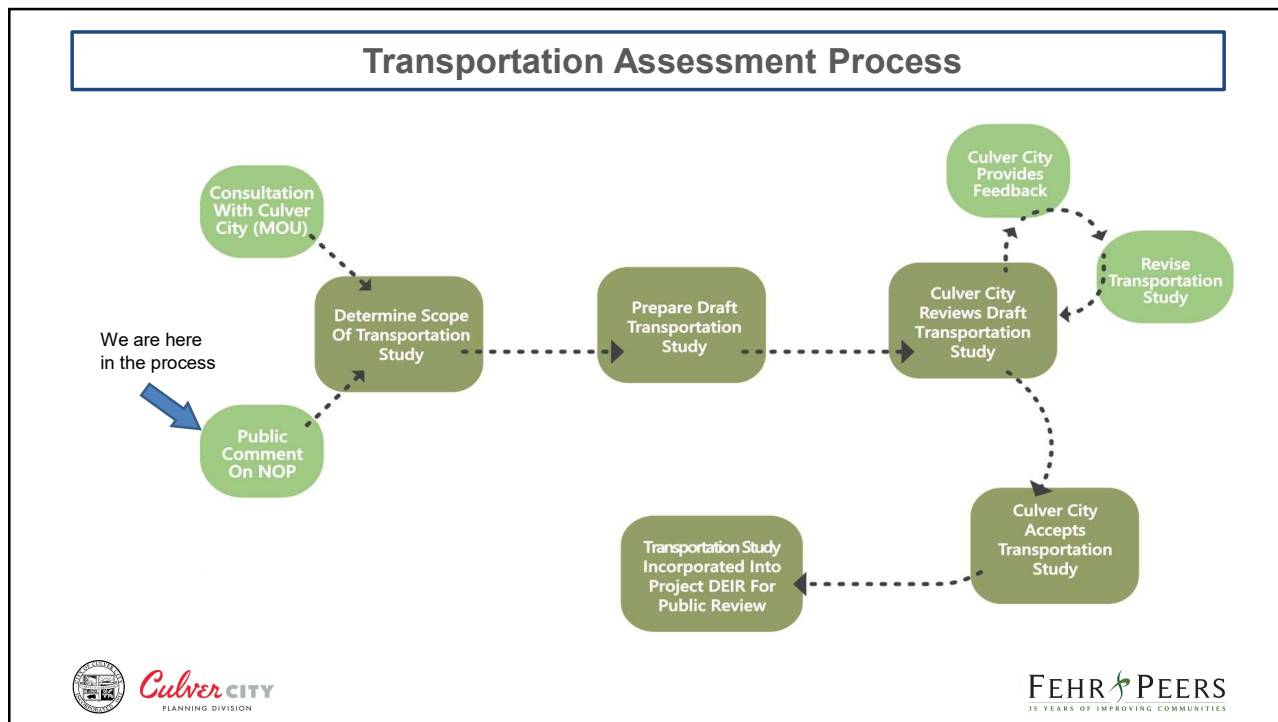


EIR Scope and Content

Topics to be Analyzed in the EIR

- Air Quality
- Cultural Resources
(Historic and Archaeological Resources)
- Energy
- Geology and Soils
(Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
(Fire and Police Protection)
- Transportation
- Tribal Cultural Resources





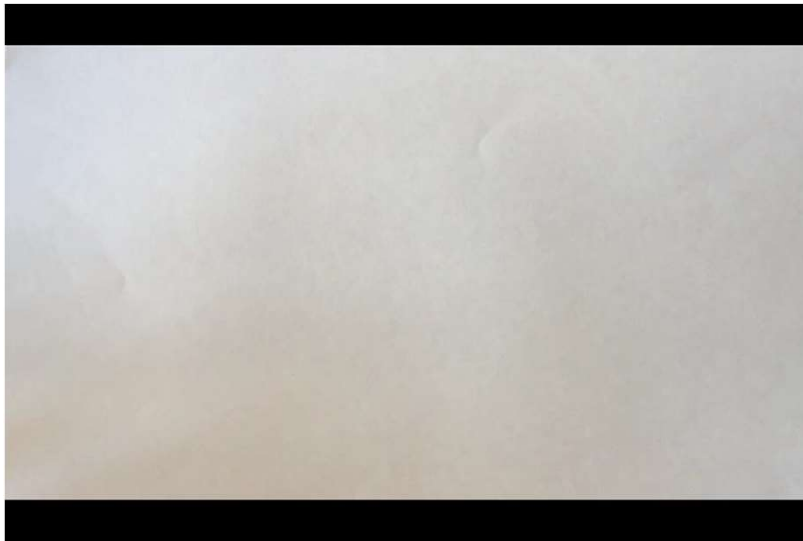
Transportation Assessment Scope (CEQA)

The State recently required vehicle-miles-traveled (VMT) as the primary metric for evaluating CEQA transportation impacts. The City of Culver City recently updated their transportation study guidelines to comply with new State requirements.

- VMT Analysis
- Adherence to City's adopted Programs, Plans, Ordinances, and Policies
- Analysis of effects on potential on-street hazards (Geometric Design)



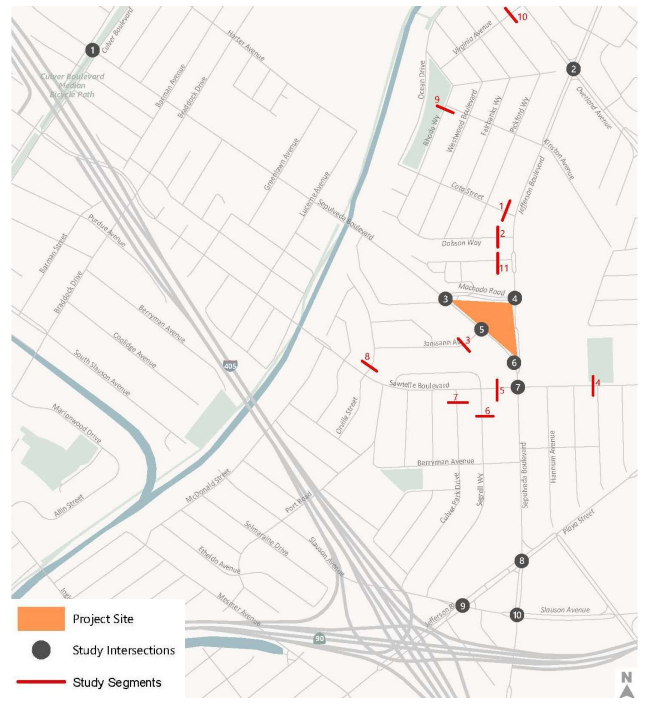
What is Vehicle Miles Traveled (VMT)?



Additional Non-CEQA Transportation Analyses

Intersection Level of Service (LOS)

- Transit Operations Analysis
- Street Segment Analysis
- Driveway Access Analysis
 - Signalize Project driveway
- Safety Analysis
- Transportation Demand Management (TDM)



Submittal of Public Comments

Due date for public comments on the scope of the EIR:
5:30 p.m. on Friday, October 16, 2020

Please direct EIR comments to:

- **Michael Allen, Current Planning Manager**
City of Culver City Planning Division
9770 Culver Boulevard
Culver City, California 90230
- **Email:** Michael.Allen@culvercity.org
- **Phone:** (310) 253-5727

Reference: 11111 Jefferson Boulevard Mixed-Use Project EIR



Questions & Answers Session

Oral Comments

Zoom

- Mouse over the bottom of the Zoom window
- Click "Raise Hand" button
- Wait until moderator calls your name and unmutes you

By Phone

- Dial *9 to raise your hand

NOTE: There will be a one minute time limit for oral comments. After you have had your turn to speak, your hand will be lowered and you will be placed back on mute.



For questions on the EIR, please direct questions to:

Email: Michael.Allen@culvercity.org

Phone: (310) 253-5727

Due date for public comments on the scope of the EIR: 5:30 p.m. on Friday, October 16, 2020



For questions on the Project, please direct questions to:

Email: 11111Jefferson@3MRCapital.com

Phone: (504) 437-1409

Appendix A-4
Comments of the NOP

Jessie Fan

From: kathy barreto <klanzo@sbcglobal.net>
Sent: Thursday, September 17, 2020 9:00 PM
To: Allen, Michael
Subject: Re: NOP of an EIR for 11111 Jefferson and Scoping/Community Meeting Notice

Understood...sorry, I should have said comments “on what environmental effects and alternatives the EIR should study,” as the notice says, after looking at the Initial Study. As a resident of Lindberg Park, the project is very much located in an “area of interest” to me.

Thanks,
Kathleen Barreto

On Sep 17, 2020, at 6:23 PM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good to hear, thank you Ms. Barreto.

Keep in mind, this is just the notice of preparation of the EIR. There is the Initial Study which discusses the components that the EIR is going to dig deeper into and provide analysis, along with several technical studies.

In case you hadn't already located it, all of these documents can be found here:

<https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects/-folder-748>

Once the comment period is closed for the Notice of Preparation, the environmental consultant working with the City will begin the full EIR, which will again be made available (similar to the NOP/IS) for review and comments. I don't have an exact timeline on the completion of the EIR, but its likely in Jan. 2021.

Best,

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

From: kathy barreto <klanzo@sbcglobal.net>
Sent: Thursday, September 17, 2020 6:12 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: Re: NOP of an EIR for 11111 Jefferson and Scoping/Community Meeting Notice

Dear Mr. Allen,

Thank you for clarifying...that does answer my question. I will send comments on the project and the EIR before the deadline.

Best,
Kathleen Barreto

On Sep 17, 2020, at 6:00 PM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good afternoon Ms. Barreto,

Thank you for reaching out to inquire, I understand how that can be confused to mean that it is our project.

As the governing body who is going to approve or deny the project, it is our responsibility to conduct or oversee the preparation of the environmental analysis. This removes the developer from influence over the environmental studies and outcomes. Accordingly, because we will oversee the preparation of the environmental analysis, and we are the governing body who will consider the overall project, that makes Culver City, the lead agency as it relates to the EIR, which we legally are required to report to the State.

I hope that makes it a bit more clear, please let me know if it raises more questions than actually answering.

Best,

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

From: kathy barreto <klanzo@sbcglobal.net>
Sent: Thursday, September 17, 2020 5:55 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: NOP of an EIR for 11111 Jefferson and Scoping/Community Meeting Notice

Dear Mr. Allen,

What does it mean that Culver City is the “Lead Agency” on the 11111 Jefferson project...is it a city project? I thought it was a private developer.

Kathleen Barreto

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

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

Jessie Fan

From: Kathy Barreto <klanzo@sbcglobal.net>
Sent: Monday, October 19, 2020 5:00 PM
To: michael.allen@culvercity.org
Subject: Comments on NOP of EIR for 11111 Jefferson Project

Dear Mr. Allen,

Having read the city's initial study for the EIR for the 11111 Jefferson Project, I have the following comments on the issues and alternatives that I believe should be addressed in the EIR.

I'll start by saying that in general, I am opposed to the "economic gentrification" of Sepulveda Boulevard in Culver City. As downtown, Helms District and West Washington have become increasingly trendy, pricey and difficult to navigate or find parking, Sepulveda has become the last bastion of normal shops and services where residents can actually buy the things they need without driving some distance to a big box store or chain. I believe in supporting small local businesses like Culver City Industrial Hardware and Sorrento Market. The Aquarium Store and Apex Aquarium are gone, Dear John's soon will be, and I fear for the future of King's Kabob and 5i Pho. I know the city has some control over this process because some years ago a developer wanted to buy a large stretch of Sepulveda and put in a lot of pricey retail stores, but the neighbors and city shot it down.

I believe that the 11111 Jefferson project will have an adverse impact on the surrounding communities in a number of ways: traffic, pollution, noise, etc. It will bring few, if any, benefits...more retail is not needed in the area, and there are empty storefronts across the street. We don't need pricey stores or restaurants displacing the current occupants of the site. It will be out of scale with the low-rise neighborhood and looks massive in the artist renderings. While the number of units was reduced a token amount, parking has likewise been reduced and there will be overflow parking and cut-through traffic in the surrounding neighborhoods, probably forcing them to establish permit parking. The number of low-income units is paltry and does not justify such a large and disruptive project.

From the initial study it appears that the EIR plans to address these issues, so I won't spend more time on them here. However there is an issue of great concern to me that I am not sure falls clearly within a category described in the study, but which I believe warrants attention, either within the EIR or by the city generally: the loss of the Jefferson Post Office, which I believe would be an enormous blow to the community--both the immediate neighborhood as well as the city and surrounding area. The downtown post office is far too small and has too little parking to even come close to replacing it, and I doubt has much mail sorting capacity. So the loss of the main Jefferson Post Office is likely to result in slower mail delivery and huge lines at the downtown branch for postal services.

I also wish to dispute the developer's claim that the post office is vacating voluntarily because it is "obsolete" and doesn't need such a big site. This is not true, as I know from first-hand information: I attended the 11/29/17 meeting at the Eras Center, held by USPS representative Dean Cameron, at which he explained that the landlord was not renewing the lease and so they were looking for another suitable site nearby. He said the requirements for a full-service post office, including parking for trucks, required a site of two acres, which was very difficult to find in this area, so that in addition to a full service branch they would also consider a retail post office, which needs less space. The latter would probably mean slower mail service, but would be better than nothing. The city was represented at the meeting by Todd Tipton. Here is a link to the USPS meeting notice, which states the reason for the move:

https://about.usps.com/news/state-releases/ca/2017/ca_2017_1103a.htm

The fact that the Jefferson Post Office is always crowded demonstrates that it is anything but obsolete. It's sadly ironic that this loss is coming just as the public is rediscovering the vital importance of the USPS as it comes under attack by the Trump administration. I think once more people know it's being forced out, the city will be getting a flood of complaints.

I understand that the city can't control a property owner's decision not to renew a lease, as is the case with the Post Office and its landlord, currently listed on the USPS website as the Marie Marcella McDonald Family Trust. However, I believe there are steps the city can and should consider to mitigate this loss:

1. As a condition of the project, require the developer to offer the USPS space for a retail post office on the site. For example, I saw that the retail plans include a market. Why would we need another market across the street from Pavilions? I believe that a market is not necessary, and the space could instead be offered to the USPS--at a discounted lease, as a public service to make up for the many undesirable affects this project will have on the community. I suggested as much to the developer at a public meeting.

2. At the very minimum, help the USPS find another suitable location in the area, or inquire as to whether they have already found one.

A final word on the developer...now that they have finally put content on their project website after over a year, they are touting the great outreach they've done and how the neighbors are now supportive of the project. Having attended all the pre-COVID public meetings, I beg to differ. They came in with an arrogant attitude, calling the site "downtrodden" at the first meeting, and boasting that because of the low-income housing element, they could build it as high as they wanted. Most of the public comments at these meetings were negative and skeptical, and more recent, smaller meetings appear to have been held with carefully selected residents that were more amenable to the project. At the last large public meeting, they insisted on forming breakout groups, which the public didn't want, as we all wanted to hear all the comments and responses, and in fact they were forced to begin with an all-group Q&A at our demand. There was no organized program for the breakout groups; they were clearly nothing more than a divide-and-conquer tactic and were basically useless...one of their reps would go to a corner with a group of residents, and it was very difficult to hear what anyone was saying. They have been anything but transparent...their project website was a shell for over a year, only posting content in the last week after I asked my neighborhood association to inquire about it. Like most developers, I sense that they would like this project to slip in under the radar until it's too late to do anything about it. I regret that all meetings must now be virtual, and appreciate the city's email notice, but I wonder if you should also be posting notices in the local papers to reach more residents?

Thank you for considering my comments.

Kathleen Barreto

Jessie Fan

From: Leah Lee Caplan <leahlee@zoho.com>
Sent: Friday, September 18, 2020 4:34 PM
To: michael.allen@culvercity.org
Subject: Jefferson project

Mr. Allen - I'm super excited to read about the proposed construction!

Leah Lee
10945 Stever St

Friends don't let friends not vote.
Sent from a democracy?

Jessie Fan

From: Josh Withers <josh@joshwithers.com>
Sent: Friday, September 18, 2020 7:50 PM
To: Michael.Allen@culvercity.org
Subject: Vehemently opposed to 11111 Jefferson Blvd

Hello Mr Allen,

I STRONGLY oppose the construction project at 11111 Jefferson Blvd. I live in Studio Village Townhomes across the street and this will not only cause noise, dust, but also block what little sunlight comes to my townhome every day. If this remained a single story structure similar to the Post Office and Diner, then I might agree with the project.

Otherwise, NO!

-Josh Withers
5215 Sepulveda Blvd #25D

Jessie Fan

From: Katherine Jarvis <katherine@jarviscommunications.com>
Sent: Monday, September 21, 2020 8:34 PM
To: Michael.Allen@culvercity.org
Subject: Project 11111 Jefferson Blvd. Culver City

Dear Mr. Allen,

I am a Culver City resident and business owner. I live at 5015 Fairbanks Way in the Lindberg Park area with my husband and two daughters. My business address is in my signature.

I read about the proposed permit for the 11111 Jefferson Blvd. mid-use project and I am writing to express my concerns.

1. The traffic at this intersection is terrible already. I would urge you to at least postpone considering this project until the pandemic has subsided, as any traffic studies done via the environmental impact report if done during this time will not reveal the true traffic congestion in this area. This intersection near where Jefferson/Sepulveda splits is already MAJORLY backed up during rush hour times, and it will get much worse by adding so many units. This route is the only one for anyone working in "Silicon Beach" and residing in West Hollywood/Beverly Hills/Hollywood, etc. and it is not near the metro rail at all.
2. If you are building that many units, why wouldn't you do more low income housing so that our community can stay livable for those who are here? Homeless residents are beginning to encroach upon our neighborhood as we speak. They are in the bushes along the Ballona Creek and Ocean, they are around the park. Let's not become Venice where it is nearly unfathomable to fix the problem. As a Culver City planner, I would hope that creating more low income housing in our area would be a greater priority. We need to take pride in our community and insist that we keep it open to socioeconomic diversity.

Thank you,

Katherine Jarvis

Jarvis Communications
5179 Overland Ave.
Culver City CA 90230
310-313-6374

Jessie Fan

From: Janet Wilson <janetwilson@ca.rr.com>
Sent: Tuesday, September 22, 2020 12:36 PM
To: michael.allen@culvercity.org
Subject: 11111 Jefferson

Hi,
I am a 20+ yr resident of CC.

I am writing about the mixed-use project at 11111 Jefferson.

Questions —

Is it a done deal? Do we have time to object to this project... brings WAY too much more traffic to that corner.

Where will our post office be?

The only other one is on Culver, and combining those 2, would make it overly busy, and unacceptable.

Thank you, Janet

Janet Wilson
310.480.4852

Sent from my iPhone



NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED

SEP 21 2020

Culver City
Planning Division

September 17, 2020

Michael Allen
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232CHAIRPERSON
Laura Miranda
LuiseñoVICE CHAIRPERSON
Reginald Pagaling
ChumashSECRETARY
Merri Lopez-Keifer
LuiseñoPARLIAMENTARIAN
Russell Attebery
KarukCOMMISSIONER
Marshall McKay
WintunCOMMISSIONER
William Mungary
Paiute/White Mountain
ApacheCOMMISSIONER
**Julie Tumamait-
Stenslie**
ChumashCOMMISSIONER
[Vacant]COMMISSIONER
[Vacant]EXECUTIVE SECRETARY
Christina Snider
Pomo**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento, CA
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov**Re: 2020090329, 11111 Jefferson Boulevard Mixed-Use Project, Los Angeles County**

Dear Mr. Allen:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalePAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Jessie Fan

From: Peter Edwards <chefpetere@gmail.com>
Sent: Monday, September 28, 2020 9:30 AM
To: michael.allen@culvercity.org
Subject: 11111 Jefferson Boulevard Mixed Use Project

Good morning Michael,

I am a resident of Culver City and own my home very close to the new proposed project on Jefferson Blvd.

I am opposed to such a large project, how tall will this building be? I can only imagine the additional traffic this will bring to my area to have 230 residential units, plus retail only a block from my home.

Has this project received the green light to proceed?

I agree with the growth and success of Culver City, although a skyscraper building a block from my home is not what I had invested in when buying and remodeling my home.

Please provide additional information as to the height of this project. Just the traffic of cars entering and exiting on this block would not make viable sense to the flow of Jefferson or Sepulveda blvd.

Thank you

Peter Edwards
Owner and resident at:
5452 Blanco Way
Culver City, Ca 90230

Jessie Fan

From: Tim Lin <tim_lin@hotmail.com>
Sent: Thursday, October 1, 2020 8:21 PM
To: Michael.Allen@culvercity.org
Subject: 11111 Jefferson Boulevard Mixed-Use Project, NOP

Hi Michael,

I am a resident in the Heritage Park community that is located directly across the street, on the North side of Machado Rd, from the 11111 Jefferson Boulevard Mixed-Use Project, NOP. I am writing with a specific concern about the risk of residents and patrons of the new development using Heritage Park neighborhood streets Ballona Ln, Lantana Ln, and Heritage Place as an accessway to the proposed subterranean parking entrance on Machado Rd, in order to avoid traffic build up on Jefferson at Machado.

I would like to propose that the current median on Machado Rd remain, to prevent the ability of driving directly southbound on Heritage Place, across Machado Rd, into the parking entrance of the new development. Our neighborhood streets are very small and young children are often present. Part of the appeal of our community is the lack of pass through traffic. It is imperative that we prevent any possibility of an influx of pass through traffic from the new development.

I appreciate if this concern and proposal can be added for consideration in the review of the project.

Thank you,
Tim

Jessie Fan

From: frough2@msn.com
Sent: Friday, October 2, 2020 4:16 PM
To: Michael.allen@culvercity.org
Subject: Culver City Triangle Project

Mr. Allen,
Please DO NOT use ZOOM for any virtual meetings, including the Triangle project.

Zoom is partially owned by the Chinese government, and the source codes are developed in China by the Chinese developers. Therefore, Chinese have TOTAL access to all conversations and video events, and monitor all business conversations and decisions. Please do not help them in learning about our business in the U.S!!!

For virtual meetings, there are several American options available for virtual meetings, such as WebEx by Cisco, or Google Meet, or Microsoft Team. These are all free of charge for public and up to 100 people can get on the meetings. Please by consider Switching over to our own services!

Thanks!

Regards,

Frough Shokoohi, Ph.D.

Jessie Fan

From: nomehome3@aol.com
Sent: Saturday, October 3, 2020 1:31 PM
To: Michael.Allen@culvercity.org
Subject: 11111 Jefferson Project

Dear Mr. Allen:

Oct. 3, 2020

We care about our children and the air they breathe. Research shows that an idling car pollutes more than a moving car. Our Culver City schools are idle free zones for this very reason. Add this massive Sepulveda/Jefferson development, with 836 parking spaces, 252 apartments, retail and restaurants, and in addition to gridlock traffic, Sepulveda Boulevard in front of Studio Village Townhomes and Heritage Square becomes an entrenched idle zone. Families and children live in these homes. If you care about the added pollution and particulates from idling cars around schools, think about our families who live in this neighborhood.

I support an upgrade to the Sepulveda Triangle, but this massive development must be greatly reduced. *We don't have the green expanse of Carlson Park, or the quaint, mellow streets around Lin Howe, but we have a right to breathe the same air.*

Sincerely,

Naomi Roth, Studio Village Townhomes

5215 Sepulveda Bl. #22A Culver City, 90230

PLEASE NOTE: Traffic is backed up as it is. These cars are stopped, and the line often goes through Lucerne/Utopia. We ask that you honor residents of Culver City to fight *for* our neighborhoods, instead of supporting outside developers from Chicago and adding to the gridlock of the city. Photos taken pre-pandemic.



Jessie Fan

From: John Yao <ichiangyao@gmail.com>
Sent: Sunday, October 4, 2020 8:07 PM
To: Michael.Allen@culvercity.org
Subject: 11111 Jefferson Blvd Mixed-Use Project - Comments on Potential Environmental Impacts

Dear Mr. Michael Allen,

Hope all is well. I am a resident at Heritage Park and have the below comments/concerns about the 11111 Jefferson Blvd Mixed-Use project (Project) that I believe should be evaluated and addressed in the Environmental Impact Report (EIR).

1. The retail site access off of Machado Road appears to be concerning with respect to traffic flow and safety. Vehicles trying to get to the Project location traveling northbound on Jefferson Blvd have to get into the left turn lane, make a left onto Machado Rd, and then make another left into the retail entrance. It is unclear if the length of the left turn lane on Jefferson is sufficient for queuing of all the vehicles, particularly during peak hours. The traffic situation gets more complicated when coupled with vehicles traveling southbound on Jefferson trying to get to the Machado entrance. Those vehicles would have to make a right turn onto Machado Rd and then immediately change lane to the left in order to make a left turn into the retail entrance. Given there is little distance along Machado Rd for vehicles heading to the Project location to queue or wait before having to make the left turn, with vehicles coming from both north- and southbound Jefferson trying to get to the Machado entrance, vehicles could potentially backed up into the Machado/ Jefferson intersection.

The Machado entrance is a difficult and inefficient entrance to access from Jefferson. It would serve vehicles coming from three directions (southbound Jefferson, northbound Jefferson, and eastbound Machado). Could the proposed configuration lead to more accidents and safety concerns for bicyclists and pedestrians due to congestion of vehicles trying to enter the Project location through Machado entrance? Does it make sense to have an access point off of Jefferson?

2. Given the large scale of the proposed development, the study should include impacts on Heritage Park from vehicles cutting through the roads within Heritage Park in order to avoid traffic congestion caused by vehicles trying to enter/exit the Project location. For example, vehicles traveling southbound on Jefferson Blvd could turn into Ballona Ln to try and avoid traffic at the Machado/ Jefferson intersection. The narrow roads within the residential community of Heritage Park are regularly used by young children and pedestrians which could raise safety concerns if used as a detour route by motorists.

Thank you for your time and consideration of my comments in the preparation of the EIR. Overall, I believe the development is too dense and massive for the surrounding communities that will lead to over congestion and lower quality of life for existing residents around this development.

Thanks,
John Yao

Jessie Fan

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Monday, October 5, 2020 2:26 PM
To: Over Built
Cc: Eriksson, Goran; Fisch, Alex; Lee, Daniel; Sahli-Wells, Meghan; Small, Thomas; Planning; ADVANCE PLANNING; laurie.lustig-bower@cbre.com; kadie.presleywilson@cbre.com; bennett.robinson@cbre.com; dave@lapmg.com; kyle@lapmg.com
Subject: Re: 1111 Jefferson Boulevard Mixed-Use Project

Thank you Mr. Young,

Thank you for the further explanation, I will pass along both messages to the environmental team, and project team accordingly.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Over Built <11111jeffersonblvd@gmail.com>
Sent: Monday, October 5, 2020 2:22 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Cc: Eriksson, Goran <Goran.Eriksson@culvercity.org>; Fisch, Alex <Alex.Fisch@culvercity.org>; Lee, Daniel <Daniel.Lee@culvercity.org>; Sahli-Wells, Meghan <Meghan.Sahli-Wells@culvercity.org>; Small, Thomas <Thomas.Small@culvercity.org>; Planning <planning@culvercity.org>; ADVANCE PLANNING <Advance.Planning@culvercity.org>; laurie.lustig-bower@cbre.com <laurie.lustig-bower@cbre.com>; kadie.presleywilson@cbre.com <kadie.presleywilson@cbre.com>; bennett.robinson@cbre.com <bennett.robinson@cbre.com>; dave@lapmg.com <dave@lapmg.com>; kyle@lapmg.com <kyle@lapmg.com>
Subject: Re: 1111 Jefferson Boulevard Mixed-Use Project

"[my] desire for there to be more information on the project website." ??? How about ANY information.?

<https://11111jefferson.com>

On Mon, Oct 5, 2020 at 1:55 PM Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good afternoon Mr. Young,

So that I may properly convey the concern to the environmental team to study further, please expand on the meaning of your use of the term "land locked."

I will convey to the property owner and development applicants your desire for their to be more information on the project website.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Over Built <11111jeffersonblvd@gmail.com>

Sent: Monday, October 5, 2020 1:48 PM

To: Allen, Michael <Michael.Allen@culvercity.org>

Cc: Eriksson, Goran <Goran.Eriksson@culvercity.org>; Fisch, Alex <Alex.Fisch@culvercity.org>; Lee, Daniel <Daniel.Lee@culvercity.org>; Sahli-Wells, Meghan <Meghan.Sahli-Wells@culvercity.org>; Small, Thomas <Thomas.Small@culvercity.org>; Planning <planning@culvercity.org>; ADVANCE PLANNING

<Advance.Planning@culvercity.org>; laurie.lustig-bower@cbre.com <laurie.lustig-bower@cbre.com>;

kadie.presleywilson@cbre.com <kadie.presleywilson@cbre.com>; bennett.robinson@cbre.com

<bennett.robinson@cbre.com>; dave@lapmg.com <dave@lapmg.com>; kyle@lapmg.com <kyle@lapmg.com>

Subject: Re: 1111 Jefferson Boulevard Mixed-Use Project

Well unless the plan for the area to hold this development has changed I'd have to disagree that it is not "land locked" by three major roads. (see attached) The plan I originally, and still see, shows a 5 story structure that is basically built right up to the sidewalk on the three streets it is contained by. If I (and many many others) wanted that, I'd live in downtown LA.

By the way, do you or any of the others CC'd here know why STILL and for more than a year now the "official project website" has no information, no nothing? It seems like someone that backs the project would have something official to say?

Todd Young

On Mon, Oct 5, 2020 at 12:38 PM Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning Mr. Young,

Thank you for providing your below stated concerns of the project being considered at 11111 Jefferson Blvd.

Please note, at this time there is no action being taken on the project itself. An Initial Study has been released for review and comment related to the elements and components that should be studied as part of the larger Environmental Impact Report (EIR) for the project.

Those materials can be found here: <https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects/-folder-749>

As it relates more specifically to your below questions:

- The project site is not land locked. However, the project size and scale as it relates to traffic, noise, height, and general associated pollution will be studied as part of the full EIR, and the results will be available through the technical analysis provided by the environmental team for public review when the EIR is released for public comments/questions.

Should you have any additional comments for the Initial Study, I am happy to include those for the environmental consultant team to incorporate into the EIR. The comment period for the Initial Study closes Oct. 16, 2020, after which the preparation of the EIR will commence.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Over Built <11111jeffersonblvd@gmail.com>

Sent: Monday, October 5, 2020 12:26 PM

To: Allen, Michael <Michael.Allen@culvercity.org>

Cc: Eriksson, Goran <Goran.Eriksson@culvercity.org>; Fisch, Alex <Alex.Fisch@culvercity.org>; Lee, Daniel <Daniel.Lee@culvercity.org>; Sahli-Wells, Meghan <Meghan.Sahli-Wells@culvercity.org>; Small, Thomas <Thomas.Small@culvercity.org>; Planning <planning@culvercity.org>; ADVANCE PLANNING

<Advance.Planning@culvercity.org>; laurie.lustig-bower@cbre.com <laurie.lustig-bower@cbre.com>; kadie.presleywilson@cbre.com <kadie.presleywilson@cbre.com>; bennett.robinson@cbre.com

<bennett.robinson@cbre.com>; dave@lapmg.com <dave@lapmg.com>; kyle@lapmg.com <kyle@lapmg.com>

Subject: 1111 Jefferson Boulevard Mixed-Use Project

Mr. Allen, Current Planning Manager - City of Culver City,

Regarding your recent communication "Notice of Preparation of an Environment Impact Report and Community Meeting / EIR Scoping Meeting - 11111 Jefferson Boulevard Mixed-Use Project" I would like to comment.

It appears that the city is forging ahead despite repeated disapproval by area residents at EVERY public meeting (back when these were possible). You are looking for comments related to the "EIR" well I can give you comments that do directly affect everything "EIR".

1) The project is TOO LARGE for the parcel of land, especially considering it's "land locked" location. Surrounded by streets, two of them perhaps the largest and busiest in the city. Backed up to the Kayne Eras center and looking down from 5+ stories onto the homes along Machado Rd. How do you think the increased traffic, noise, and general associated pollution will be welcomed here?

2) Too tall. The project is at least three stories taller than ANYTHING within sight of the location. It will be a behemoth that will stand out precisely like one. It will create a visual blockage to the sight lines in the area.

3) It will WITHOUT a doubt impact traffic in one of if not the most congested intersections in the city. Jefferson / Sepulveda / Sawtelle - ALL through access streets in the city, streets that radiate out to freeway access points including the 405 and 90 to the SW at Jefferson and Slauson. Also towards the 405 at Sawtelle / Sepulveda at Culver Blvd. This corridor along Sawtelle DIRECTLY impacts the Sunkist Park neighborhood of the city and hundreds if not thousands(?) of homes and their occupants. The traffic light at Sepulveda and Sawtelle was adjusted to have TWO cycles for traffic along Sepulveda, which has caused congestion of both the north and south bound traffic along Sawtelle - and therefore impacting in many ways (including air, noise, and particulate pollution) the residential areas on either side of Sawtelle.

Why are we allowing a "land locked", 5+ story, 230 unit, AND retail* space structure to be built here? Well I know.... Why don't we build something 1/3 the size here? I know why.... I for one would be fine and would even support something of a reasonable scale here. Two or three stories and 1/3 to 1/2 the square footage. Now... retail* space... This IS perhaps the biggest "joke" of the whole thing. WELL PRIOR to "Covid" and the "new normal" we had and still have retail sitting empty. The former Aaron Bros "strip mall" RIGHT at this very intersection. It has sat empty for years now. The Toys R Us, now occupied by a business that will NOT last long, I know it, you know it. The now empty Pier One, a business that was closing locations BEFORE Covid. Bed Bath & Beyond is reported to be closing 60 of their locations. Just down the street the now long empty OSH Hardware. Don't EVEN get me on a "soap box" about the east end of the city... Here too, overbuilt, infrastructure not designed for the growth and never will be. There is only so much space, and it's already overbuilt.

The city is (seems a done deal - sadly) allowing (great tax income, right?) something that DOES NOT fit into the "Scale" of the surrounding city. This scale issue DIRECTLY impacts all things environmental in the broadest meaning of the word.

Please let's not build a mess like the city has done at Washington and Inglewood Blvds. Let's not follow the behemoth and frankly ugly "wall like" feel that THE ENTIRE length of Jefferson Blvd from Centinela to Lincoln became 10 years ago now just SW of the city.

There is a reason Culver City is (was?) a great place to live. I understand growth and the need for housing, but we should be careful not to radically change the very reason people want to live here.

I am a 3rd generation Culver City resident. Home owner in the city, business owner, former CCPD Explorer, so, yes I do have something in the game here. As I said, I'd happily support (re) development at this site on a more reasonable scale, but as it is currently designed I will have to use all any means to fight it.

Looks like I'll need to mail my folowers and do some updates to our website
<https://11111jeffersonblvd.wixsite.com/overdevelopment>

Todd Young
11112 Orville St.
Culver City, CA 90230
(310) 413-5828

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

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

Jessie Fan

From: Garry Schyman <garry.schyman@gmail.com>
Sent: Monday, October 5, 2020 2:42 PM
To: michael.allen@culvercity.org
Subject: 11111 Jefferson Blvd Mixed use Project

Hello Mr Allen,

My name is Garry Schyman and I and my wife and son are long time residents of Culver City. I write because I am extremely concerned that the Mixed Use project on Jefferson Blvd. is a very bad idea for our city. We are already a densely populated area and adding that my units to Jefferson will certainly make driving and commuting in our city much worse than at present.

Please let me know how I can participate to help stop this ill-planned project.

Thank you

Garry Schyman

Jessie Fan

From: Suzanne Krant <suzanne906@icloud.com>
Sent: Monday, October 5, 2020 3:20 PM
To: michael.allen@culvercity.org
Subject: Jefferson Triangle

> Dear Mr. Allen,

>

> As long time (more than 20 years) Culver City residents, we are compelled to express our concern and disapproval of the Jefferson Triangle Development due to its adverse impact.

>

> The thought of building 230 residential dwelling units, retail, and offices is appalling. Such a mixed use project would result in more congested traffic, air, and noise pollution. Surrounding neighborhoods will be affected by overflow parking.

>

> The former charm of Culver City is devolving into a chaotic, impenetrable mass of cars. Additionally, It's inevitable that small businesses would no longer be able to afford the higher rents.

>

> This whole project serves developers, instead of the Culver City residents and should NOT be approved by City Council. Did you ever consider a cultural center for that location, such as a museum....what a concept to enhance our lives instead!

>

> Sincerely,

Suzanne Krant
1102 Raintree Cir,
Culver City CA 90230

Earl Rodriguez
1107 Raintree Cir,
Culver City CA 90230

>

Jessie Fan

From: Ochoa, Richard <rcochoa@bclplaw.com>
Sent: Monday, October 5, 2020 6:29 PM
To: 'Michael.Allen@culvercity.org'
Cc: Ochoa, Richard
Subject: RE: 11111 Jefferson Boulevard -- EIR Scoping Meeting -- Comments and Questions -- REVISED TO CORRECT TYPO IN PRIOR EMAIL

Importance: High

REVISED TO CORRECT TYPO IN PRIOR EMAIL – PLEASE USE THIS ONE – THANKS!

Hi Michael, and hope you and your family are safe and healthy through these crazy pandemic times.

I am a current and 17 year-Board member of the Classics at Heritage Park Homeowners' Association ("Classics") and a 20-year resident of the HOA (since its inception). Located directly across portions of Machado Road and Sepulveda Boulevard, the Classics HOA is the community that will be most affected by the proposed development at 11111 Jefferson Boulevard, both during its construction phase and from its post-completion occupancy and contemplated uses.

I'd like to focus my comments/questions below on the issues and impacts presented by the current plans for Machado Road and the proposed reconfiguring of the island on Machado Road at the Heritage Road entrance to the Classics HOA community.

Currently, only a right turn is permitted when exiting Machado from Heritage (towards Sepulveda), and only a left turn from an earmarked left turn lane on Machado to enter the Classics and the ERAS school parking lot.

We have learned through our community's last meeting with 3MR that the primary entrance for residents and guests of the proposed tower building containing the 230 apartment units will be located directly across Machado at this location. The proposed reconfiguring on Machado will, among other work, demolish the portion of the center island and removal of the yellow pylon barrier at this location.

Thus, this proposed reconfiguring will incentivize and enable hundreds of apartment residents and guests with the ability to cross Machado from Heritage after cutting through our narrow HOA streets from westbound Jefferson to avoid Machado and gain quicker entry into the residential parking lot. Second and conversely, it will enable those same residents and guests to cross Machado, enter our community to cut through to Jefferson (and avoid Machado gridlock southbound towards Jefferson) to travel west or east (after turning into the shopping center.)

Third, this proposed reconfiguring will incentivize and enable hundreds of retail guests (or commercial tenants) with the same cut through access from westbound Jefferson for to avoid the gridlock at Machado and Jefferson (as the contemplated Machado Road retail entrance requires a quick left off of that intersection).

Fourth, it will incentivize those very residents or their guests, visitors to the contemplated park facilities, and the retail guests to park on our HOA streets and walk to the development, than fight for a parking space. This brings corresponding impacts on the limited parking available for our HOA residents, and security and safety

issues. In the same vein, the ERAS parking across the school on Machado is being demolished as part of the development. With that goes the primary part of the solution achieved by our HOA to resolve the serious problem of ERAS personnel, staff and business invitees parking in our HOA community. The 36 spaces currently allotted in the Project's residential parking structure for ERAS use is less than what was available in the lot to be demolished and does not accommodate a number of their buses, and my HOA has every interest in not having those parking issues reemerge.

Fifth, this proposed reconfiguring will incentivize and enable residents and their guest to exit across and turn left onto Machado towards Sepulveda at an already highly congested and dangerous section of Machado Road, which was previously avoided by creating the left turn only lane which exists to provide one of two primary entry points to our community.

The Classics HOA privately owns and maintains the streets within its community, along with the tot lot park it maintains and whose use will also be impacted. With these issue points in mind, how does the City's proposed reconfiguration of the Project access points on Machado avoid these adverse impacts on the Classics? Why are there no access points for the development being considered at all on Jefferson, as currently there are two presently at the Post Office and Coco's? What alternatives, such as access gates, or permitting a right turn only exit from Ballona Lane onto Jefferson, will the City consider to eliminate these issues?

There are many advantages to this Project and excitement from our members. Rupesh Bhatia and Kyle Faulkner from 3MR have been very transparent and sensitive to these impacts on our community. But the considerable increased cut through traffic, parking and security impacts presented by the current Machado Road configuration are real, the Classics HOA requests a meeting with the City and 3MR to achieve mutually acceptable alternative solutions including as discussed above. Thank you in advance for your time, and look forward to working with you.

Richard



RICHARD C. OCHOA
rcochoa@bcplaw.com
T: +1 310 576 2155 F: +1 310 260 4155

BRYAN CAVE LEIGHTON PAISNER LLP
120 Broadway, Suite 300, Santa Monica, CA 90401-2386

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Jessie Fan

From: Dana Parks <imdparks@yahoo.com>
Sent: Monday, October 5, 2020 10:08 PM
To: michael.allen@culvercity.org
Subject: OPPOSITION to 11111 Jefferson Project

I am a 43 year resident of Culver City, a lawyer, and owner of a townhome in Raintree. The proposed excessively large development at 11111 Jefferson Blvd. will negatively impact my quality of life.

The intersection where this project will be built has suffered extreme traffic problems for decades, even before Culver City was popular.

I drive through the intersection all the time, on the way to take care of my 91 year old mother. The idea of adding 230 residential units (with a token 19 units set aside for low income households) and multiple commercial uses to this overburdened intersection is entirely unacceptable. The proposed market will attract a constant stream of cars, adding more traffic and air pollution to our city. We do not need ANOTHER market when there is a Ralph's, Pavilions, 2 Target supermarkets, Sorrento Market, Sprouts and a Trader Joe's within a mile of the proposed development.

Culver City used to be charming.
In the last 5 years, it has become unliveable, thanks to our greedy, short-sighted planning department and City council.

Please, DO NOT approve this inappropriately large, traffic causing, pollution emitting project down the street from me.
Dana Parks
5002 Cascade Court
Culver City. 90230

[Sent from Yahoo Mail on Android](#)

Jessie Fan

From: Katie Chou <katiefchou@gmail.com>
Sent: Tuesday, October 6, 2020 8:53 AM
To: Michael.Allen@culvercity.org
Cc: Katie Chou
Subject: 11111 Jefferson Blvd Mixed-Use Project - Public Comments for Scoping Meeting

Dear Mr. Allen,

I am a resident of Heritage Park and am deeply concerned with the size of the proposed 11111 Jefferson development. I reviewed a couple documents posted on the Culver City website and would like to submit my comments to you before tonight's scoping meeting. May you kindly confirm my comments below are received?

Thank you,

Katie Chou

Part I: Transportation

- 1) The length of left-turn lane onto Machado from the northbound Jefferson traffic remains the same after development. However, this left turn lane length was not sized to account for dramatically increased left turn traffic to utilize 653 proposed parking stalls. The insufficient left-turn lane length may result in the queuing traffic occupying the inner through lane of Jefferson northbound traffic. This can cause further traffic backup for the Jefferson northbound traffic delaying regional buses and cars to pass through.
- 2) The retail access at eastern Machado is highly inefficiently located. The northbound Jefferson traffic needs to make two consecutive left turns to get in the complex. The southbound Jefferson traffic needs to firstly make a right turn, immediately change lane, and make a left turn to enter the complex. With such as short distance between the Machado/ Jefferson intersection to the eastern retail access on Machado, there is no proper length to merge right turn traffic from southbound Jefferson and the left turn traffic from northbound Jefferson before the merged traffic makes a final left turn onto the complex. The Jefferson/ Machado intersection expects to be very messy with frequent queuing traffic and accidents. Please relocate the eastern retail access to face Jefferson for an efficient access.
- 3) The inefficient retail access facing Machado also raises an emergency access concern. This inefficient access point is difficult for a large fire truck to maneuver when coming from Jefferson. The left turn movement from Machado onto the project site never existed or exercised by the fire department.
- 4) The proposed location of residential access also raises a transportation safety concern. The proposed residential access appears to intentionally align with the Heritage Park entrance. Thus, the residential traffic at this juncture can go any direction (i.e. left, right or straight into Heritage Park). This proposed wide and open access invites the cut through traffic into the Heritage Park neighborhood and is prone to have accidents. For the safety and an orderly traffic flow, please relocate the residential access further east to stagger the entrances. The traffic median can be slightly configured to allow a left turn only movement from westbound Machado traffic onto the relocated residential entrance. Please leave the existing left-turn only traffic median configuration alone for turning into Heritage Park. The staggered access and the "left turn" only traffic median configuration avoid the cut through traffic to the Heritage Park neighborhood where many young children play and eliminate

the traffic accidents/ conflicts if the residential access were designed to align with the Heritage Park entrance.

To summarize points 1-4, the inefficient eastern retail access should be moved to face Jefferson to significantly reduce the left-turn movements. A retail access facing Jefferson will provide adequate fire truck access similar to today's access point. A relocated residential access east of Heritage Park entrance will avoid accidents and allow Machado & its traffic median to stay as is except for opening a "left turn" only median configuration for the relocated residential access.

Part II: Parking

- 5) In Table A-1, what are numbers of the required handicap parking stalls for both the residential parking and the commercial parking? Please add those to Table A-1.
- 6) What are numbers of dedicated parking stalls for the residential leasing office? Please add those to Table A-1.

To summarize points 5-6, the counts of parking stalls appear to miss the required ADA parking.

Part III: Excavation

- 7) Page A-15 of the initial report says the project would excavate to a max of 25' below grade. Does this estimate account for the installation of a proposed 60' x 15' x 12' stormwater capture and detention structure shown in the SUSMP report?

Part IV: Public Services

- 8) Page B-34, public services – schools. The projection of 71 students is based on an old 2010 publication that utilized an even older data. The projection of student increase needs to account for the population growth for 2024 and beyond. The impact may not be less than significant.
- 9) Page B-37, public services - other public facilities. The last paragraph says the use of such facilities (e.g. surrounding roads) would not require maintenance beyond normal requirements. This is untrue. The large delivery truck of 65' or 70' long will traffic on Machado daily due to the loading dock location. Additionally, the scale of trash pick for hundreds of apartments and commercial buildings are several times larger than the existing condition. These impacts can require Machado and the adjacent roadways to be maintained beyond current normal frequencies. The impact should be reconsidered and may not be less than significant.

Part V: General

- 10) The proposed design has missed a children's playground for young residents as other design amenities are for adults.
- 11) For planning and design of such a large scale development situated at a critical traffic split/ junction, a Culver City resident would expect a reliable traffic modeling and projection is conducted first to advise how much additional development (e.g. parking, numbers of apartments, retail size etc.) the 11111 Jefferson site may accommodate without degrading the traffic condition and the safety of the surrounding roadways and communities. The current process appears to be reversed. Developer keeps putting out their wishful design but has no idea for limits imposed by traffic and the supporting roadway. The traffic conversation has gone on for the Heritage Park and the neighboring communities over a year. However, developer can offer no traffic solutions in their outreach each time.

Part VI: Drainage and SUSMP

12) Per paragraph 2.1 SUSMP calculations and design criteria, it says “Our analysis shows the 85th percentile to be greater, which shows to be 1.1 inches”. However, in the appendix, it did not include the analysis to illustrate how to arrive the 1.1 inches design parameter.

13) In Appendix A, the calculation for area DA-2 is missing.

14) In Appendix A, please provide calculations to show the determination of undeveloped runoff coefficient (Cu) for each area.

15) Why the undeveloped runoff coefficient (Cu) shows differently in Appendix A and Appendix B for the same AREA 1 of 3.43 acres?

16) Please explain why the time of concentration is lengthened substantially from 9min to 28min by only reducing the impervious area by 7 percent? Please provide calculations of the time of concentration.

Jessie Fan

From: Katie Chou <katiefchou@gmail.com>
Sent: Friday, October 16, 2020 2:18 PM
To: Allen, Michael
Subject: 11111 Jefferson Blvd Mixed-Use Project - Additional Public Comments

Mr. Allen,

I have additional comments for the initial study report in Section D, attachment A, page A-4.

The justification of rezoning for the northmost parcel (AIN # 4215-001-020) is not clear. It is difficult for a resident to understand based on the current documentation.

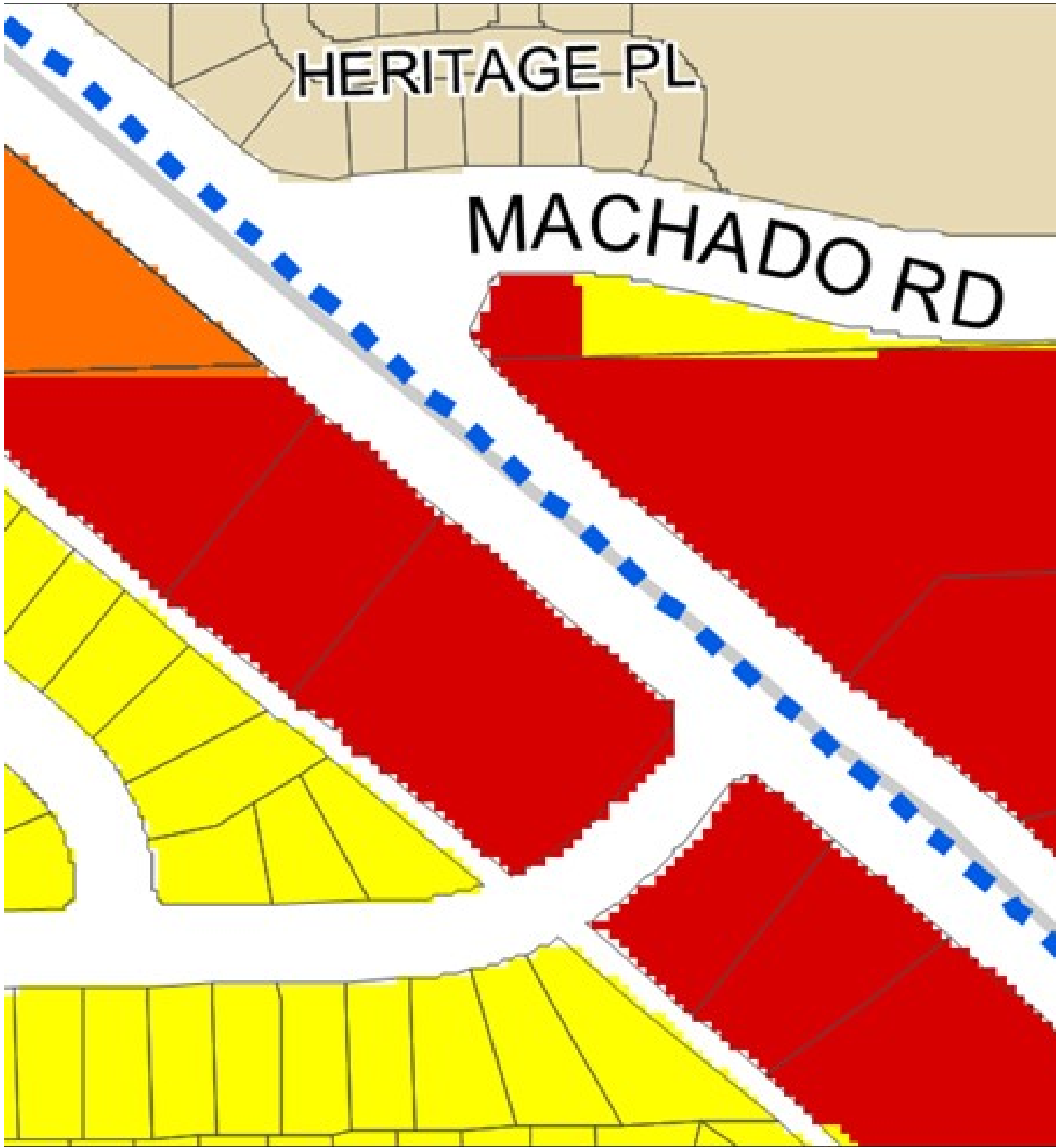
Per City's zoning map (see below image or <http://www.culvercity.org/home/showdocument?id=142>), approx. 70% land of parcel #4215-001-020 is zoned to R-1 (single-family; in yellow color). Thus, the majority of the northmost parcel is zoned to Single-Family (R-1). This is particularly important as this existing R-1 zone is along the Machado where the developer has proposed to place two commercial accesses. City will need to change zoning from R-1 to Commercial General to allow this incompatible use if 11111 Jefferson Project were to be approved. Please explain what types of innovation in site planning and environmental considerations have been implemented to permit this zoning change. This R-1 parcel has provided an important buffer/ setback to separate the peaceful Heritage Park residential area and the existing commercial zone in the Jefferson triangle. Rezoning this R-1 parcel to allow two commercial entrances will pose unprecedented challenges in the immediate and the adjacent communities in many ways (e.g. sub-standard existing roadway geometry to accommodate commercial use, safety, transportation/ traffic, emergency access & response time etc.). Please help residents to understand why this rezoning may even be considered and have a public meeting with the communities. Developer has stated the site is currently zoned to Commercial General (CG). This answer was provided in the Oct 6, 2020 public zoom meeting and is misleading.

Additionally, an independent reviewer (i.e. another traffic specialist) is needed to help review both CEQA and non-CEQA transportation/ traffic analyses. The same traffic consultant has been working on traffic matters since last year. Their prior studies (i.e. 4 of 10 intersections were rated as "A" during peak hours) have invited the public dis-belief. If another independent traffic guru can agree with the existing and the upcoming traffic/ transportation assessments, it fosters the public trust for this ongoing traffic study.

Please kindly confirm additional comments are received.

Sincerely,

Katie Chou



Jessie Fan

From: Wandy at Heritage Park <heritagepark.wandy@gmail.com>
Sent: Tuesday, October 6, 2020 11:42 AM
To: Allen, Michael
Cc: Wandy at Heritage Park
Subject: 11111 Jefferson Blvd Mixed-Use Project - Questions and Comments

Hi Michael, I am a resident of Heritage Park community. I have a number of concerns about the 11111 Jefferson project. At the top of my list of concerns, is how the project may bring vehicle danger to kids and pedestrians in Heritage Park, and causing traffic congestion and accidents in our area.

Below is my list of questions and comments for the city's planning and traffic departments. Please let me know if my questions are received or if there's anything else I need to do.

Thank you for your team's work to protect our safety and quality of life!

1. **Machado Median:** The initial study, on page 23, is showing the Machado median being modified to allow westbound traffic to turn left into the two entrances (residential and retail) of the complex. The modified median also appears to allow vehicle traffic to exit Heritage Place and cut across Machado to enter 11111.

We cannot have people using Heritage Park as a cut-through. The community roads inside Heritage Park are narrower than standard streets, with sidewalks only on one side.

Cut-through traffic would (i) be dangerous for the pedestrians and kids in the community, and (ii) unfairly increases the road maintenance and repair cost, which are paid for by Heritage Park.

- a. What are the city's plans to prevent cut-through traffic from using Heritage Place community roads to access the 11111 complex? (such as, reconfiguring the layout of the residential entrance location and the Machado traffic median, a gate installation, or other solutions)

2. **Vehicle Entrances on Jefferson vs Machado:** In the initial study, the design does not have any vehicle entrance on Jefferson Blvd, but has two entrances on Machado.

The problem is, this design forces all traffic from Jefferson to turn into Machado, then making a left immediately, in order to enter the project. Same goes for exits. Visitors wishing to go south need to exit Machado, then turn right onto Jefferson to Sepulveda. All the while competing with traffic cutting through between Sepulveda and Jefferson on a winding street.

We expect all the turns will create significant traffic jams and accidents on Machado and Jefferson.

If we moved the vehicle entrances from Machado to Jefferson, it would reduce a lot of turns and traffic queuing. The project leads told us that they cannot put an entrance on Jefferson, because Culver City said they cannot.

- a. Please further explain the city's reason to not allow entrance on Jefferson?
- b. Or, if the city did not disallow entrance on Jefferson, please explain if the city would ask the project to have a Jefferson entrance (in lieu of the retail entrance by Machado)?

3. **Neighborhood Traffic Management Program (NTMP):** The 11111 project leads said they will be paying \$750,000 to Culver City for "Mobility Fund". As the closest community to 11111 project, Heritage Park will be impacted by the increased vehicle and foot traffic, but we have not yet concluded what NTMP tools would be the best solution.

a. How much funds will the city set aside for Heritage Park's future NTMP needs?

NTMP needs can include but not limited to:

- i. Vehicle access gates
- ii. Speed bumps
- iii. Permit parking
- iv. Signage
- v. Traffic Island

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

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

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

5. **Retail / Office Parking Fees:** The project leads have told us that parking will be free for the visitors, which we are glad to hear. If they start charging for parking, more visitors would be looking for parking on the residential streets in our neighborhood.

- a. Please confirm if there will be a mandate from the city, that the visitor parking for the project shall remain free?
- b. Or, if the city will not make the above mandate, can the city mandate that, if the development is to start charging for parking, they work with the Heritage Park and Linberg Park communities to put a plan in place to prevent people from driving through and parking on residential streets?
- c. If neither mandates are possible, what is the city's plan to protect the communities from the impact, if 11111 starts charging for parking?

6. **Play Structures:** With 230 residential units located in the fantastic Culver City School District, the development will attract a large number of families with young children. They will need their own recreational facilities.

- a. Please confirm if there will be play structures for the children of the residents and their guests?
- b. If there will not be play structures, please provide a reason?

7. **Residential Guest Parking:** The Culver City building code requires 1 guest parking for every 4 residential units in an apartment complex --- that would mean $230/4 = 58$ parking spots -- But the initial study document, on page 22, does not include residential guest parking.

- a. Please confirm if the project is required to have guest parking per city code?

Thank you.
Wandy Sae-Tan

Jessie Fan

From: Sarah Goldman <sarahmgoldman@hotmail.com>
Sent: Tuesday, October 6, 2020 2:00 PM
To: Michael.allen@culvercity.org
Subject: 11111 Jefferson project

Mr. Allen,

Thank you for taking our comments in advance of the zoom meeting. I live in Heritage Park, across Machado, and my questions and concerns mostly surround the entrance and exit points of the development. During the last meeting, Kyle showed a picture that shows an open pathway from Heritage Place, across Machado, and into the residential entrance for 11111 Jefferson. This was news to us and quite alarming! Are you in talks to make it so that one may drive out of our neighborhood on Heritage Pl and be able to cross Machado directly into the 11111 Jefferson project? This is a very, very concerning development. Currently, when we exit our community, it is a right turn only onto Machado with a concrete median and vertical markers, making a left almost impossible (unless you are breaking the law). If this new median on Machado is the plan, people will definitely be turning into our neighborhood on Ballona Ln from Jefferson, weaving through our neighborhood (at all speeds), and crossing Machado at Heritage to evade the light at Machado and Jefferson. We are absolutely NOT favor of this happening! I quickly counted and we have at least 18 families with young children in our neighborhood. Maybe more as I don't know everyone personally. We battle car speed in our own neighborhood, and luckily haven't had a problem yet. Allowing all of your residents, their guests, visitors of the project that get discouraged with the traffic, or guests that need a quick parking space (another HUGE problem as we barely have enough for the residents here) into our neighborhood just cannot happen. I, alone, have 3 kids that ride bikes, scooters, and the like, in our streets every single day. Especially now since we can't even go anywhere. Every one of those 18+ homes has 1, 2, or 3, and I believe one neighbor has 4 children (insert math here). We have to do everything we can to keep the traffic low and safety high. Welcoming new traffic does the exact opposite. My proposal is not to change the median at Machado and Heritage so we may continue our safe exit from our community. Also, in regards to Machado, when you drive on Jefferson and turn right on Machado, you are in a blind space (curve) where the residents of HP, who are leaving, cannot see you until you are reaching a decent speed. It's already a touchy, troublesome street (Machado) and the proposed increase in traffic terrifies me. Also, if you turn onto Machado from Jefferson, and you haven't visited this intersection before, you will likely be in the wrong lane and will have to make a quick lane transfer to turn into 11111 Jefferson. Because of this I propose many signs warning drivers, as well as speed bumps or strips or something that slows cars. There will be a LOT of action on Machado with this project and people fly up and down that street now and it terrifies me at what's to come. A neighbor was walking home on Machado from Pavillions last year and a car turned onto Machado from Jefferson, was going too fast, lost control, and ended up crashing into a palm tree planted on the sidewalk. Thankfully it didn't hit her! But she got to see the whole thing. Terrifying. You can see there's one palm tree on Machado that's much shorter than the others....that's it. I heard that the city is pushing back on having any entrances on Jefferson, but the Post Office, Coco's and Valvoline currently have entrance/exits and it's never been a big problem that stands out as something that needs to be fixed, and it would take the pressure off the tiny street of Machado that can't handle much more safely. Long story short (too late!) we need to protect our community, and more specifically our children. The latest house just went for sale in our neighborhood for over \$1.9 million. Please help us keep the value of our homes, and PLEASE help me keep all of our kids safe, alive and well. Thank you so much for reading this and I look forward to the zoom tonight.

Sarah Goldman

Jessie Fan

From: jim tutwiler <jimtutwiler@gmail.com>
Sent: Tuesday, October 6, 2020 2:29 PM
To: michael.allen@culvercity.org
Subject: Jefferson Triangle

Please stop these ridiculous developments intended only to make more tax revenue and not to make our once nice community better. .We need less development. What a mess around the old Culver Hotel, both our metro stations are abysmal and Culver Studios is a God Awful mess. What do you think you are doing.....Nothing for our nice city. Do you even live here.

We have lived in Raintree Townhomes for 15 years now....whats next for us.

Cheers,

Jim Tutwiler

310-309-1509

Jessie Fan

From: Patricia Bijvoet <patriciabijvoet@me.com>
Sent: Tuesday, October 6, 2020 4:03 PM
To: Jessie Fan
Cc: Allen, Michael
Subject: NOP 11111 Jefferson tonight
Attachments: 11111 Jefferson NOP-EIR.pdf

Hi Jessie,

My intention is to submit my thoughts for an alternative in the EIR study. It might be helpful to ask for tonight if those elements are within your scope to study.

My very best, Patricia

Patricia Bijvoet

<https://www.upla.studio>

Principal UPLA studio

5637 Corbett Street

Los Angeles,

CA 90016

USA

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mail: patriciabijvoet@mac.com

mob: +1 310 614 9608

"What environmental effects and alternatives should the EIR study? You are being notified of the City's intent, as Lead Agency, to prepare an EIR for this Project, as it is located in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by consultants under direction of the City and submitted to the Current Planning Division for independent review and certification."

Public comment for NOP for an EIR 11111 Jefferson Boulevard Mixed-Use Project

Patricia Bijvoet
5637 Corbett Street
Los Angeles 90016
Oct 3, 2020

dear Michael,

Thank you for seeking my comments on environmental effects and alternatives that should be studied in the EIR on development 11111 Jefferson Blvd.

I consider Culver City as part of my daily urban system and I am passionate about making CC the daily urban system for as many people as possible in a robust and resilient way.

Adding a substantial amount of residential units, including low-income housing in this location serves that goal.

I see the potential of this development being an additional landmark for Culver City. Not so much iconic in shape (although...think of Culver Hotel 2.0), but more importantly, exemplary in achieving goals that serve Culver City.

I would hope you will consider the following elements to include in an alternative plan to reduce the environmental impact.

A: In order to reduce the substantial impact on air quality/greenhouse gasses/land use/noise/population/transportation (III, VIII, XI, XIII,, XIV, XVII) while still developing as much housing as possible on this prominent and well-suited location:

1. switch program from less commercial to more residential;
2. include a higher percentage of affordable housing;
3. minimize amount of built parking and maximize double use of pp spaces;
4. prioritize healthy living by design.

(the following explanation is not to read out loud but to be added as written comment)

1. *By switching into more housing and less commercial, the requested amount of parking can be reduced. By excluding the big market and including only smaller units for retail/food, you are encouraging local entrepreneurs and you facilitate shopping by bike / by foot. Design for adaptability by allowing living above the store as a concept.*
2. *By including more Micro units you can reduce the amount of officially required parking spots. It would be better **if CC is willing to change the parking minimum** for affordable housing units at a distance of 0.53 mile from the Transit Hub and many busses passing by. Currently there is no differentiation for affordable housing, only for ADU or Micro-units within 0.5 mile from a transportation HUB or when shared car facility in the block. By the way, by including a higher percentage of affordable housing/workforce housing, you are sure to build for the local market high in demand and can be sure that in general less vehicle miles will be made.*

3. *(1. and 2.) Include a shared car facility as an amenity in the development. Exclude a separate office space and consider to include shared workspace for residents instead, that way more sqf is available for housing and the project won't need 3 layers of parking. By combining parking for residents and retailers/employees/customers, less parking is needed. The current zoning code does mention a lower parking minimum in case of an approved parking plan - could this be creatively researched as an option for this location?*
4. *The way entrances, parking, bike parking, staircases and elevators are organized has a high impact on the movements of residents and users. Encourage to enter buildings by foot, by stair, (+ of course always facilitating smooth entrance for disabled) instead of by car /by elevator. The more residential entrances directly on the street, the more pedestrian traffic is encouraged. The more (public) bike-parking on the street, the easier it becomes to use your bike instead of first having to go to the parking garage. A series of smaller shopfronts (instead of a market box or parking garage) stimulates strolling. To prevent a street design that breathes traffic solutions and instead offers a street design that invites strolling and biking, rethinking Sepulveda and Machado is needed. No slip-lane, no cutting of the sidewalk for drop-off, including protected biking in the R.O.W. and adding short term parking-drop off lane. Consider parking subterranean and first level in such a way that natural air-circulation can take place and a green shared courtyard can be designed with trees standing in full ground. In case of 4 stories of housing facing the busy boulevards on one side, you want to offer those houses a quiet side with a balcony towards the inside. A signature designed courtyard could be opened for the public during the day and closed during the night.*

B: In order to lower the carbon footprint of the building during building process and on the long term (impact on Energy/Greenhouse gas item VI, VIII):

1. use locally sourced building materials & building materials with a zero carbon footprint (sources: <http://www.mindfulmaterials.com> <https://www.bamb2020.eu/topics/materials-passports/>);
2. design for natural ventilation and a minimum use of electricity based heating/cooling by including solar energy and/or heat collector system in the complex (net-zero building <https://netzeroconference.com/speakers/will-vicent-2/>).

There is always a priority involved. The biggest benefit for the environment is found in building compact cities that rely less on single car use.

Building is better than not building, an alternative with elements from A should at least be considered and compared to the current proposal and if we want to set the bar high, also B. should be included.

Thank you for your attention, Patricia Bijvoet

Jessie Fan

From: Myrna Kayton <mskayton@gmail.com>
Sent: Tuesday, October 6, 2020 4:18 PM
To: Michael.allen@culvercity.org
Subject: Proposed Jefferson Triangle project

Dear Mr. Allen,

I am a Concerned Culver City Resident; my home is about half a mile from this proposed project. I attended the public meetings held at Temple Akiba where there was almost unanimous opposition voiced by dozens of individuals.

Prior to Covid, this intersection was an extremely congested traffic area. When our lives return to "normal", the prospect of hundreds of additional vehicles entering and leaving this complex - mostly during rush hours - would be a horrendous nightmare!

A 5-story building is proposed. It would stand out like a Sore Thumb! Outside of the downtown area, few if any Culver City buildings currently exceed 3 stories. This would set a new precedent for our city. Other developers would probably pursue similar projects. The character of Culver City would be forever changed.

Although within legal limits, the number of parking spaces proposed are not realistic. Residential units would ideally be allocated 2 spaces apiece. There would be fewer than 1.5 spaces in this plan. Residents without assigned parking would then take up spaces on nearby streets and adjacent commercial parking lots. This would be a burden on many homeowners and retail stores.

A public park at Machado and Sepulveda would expose adults and children to heavy gas fumes from Sepulveda traffic. This would make for unhealthy breathing. If this project goes through, this park area should be relocated to a protected space - away from Sepulveda and away from Jefferson.

I suggest examining alternate locations for this project. There are a lot of underused commercial buildings a little further south on both the east and west sides of Sepulveda. Building a complex there would not have the negative impact of a development that this highly trafficked intersection would inflict on this area.

Sincerely,
Myrna Kayton

Jessie Fan

From: Shira Sergant <shirasergant@hotmail.com>
Sent: Tuesday, October 6, 2020 8:08 PM
To: Michael.allen@culvercity.org
Subject: 11111

Hi Michael,

The world is totally different right now, and so is the traffic on Sepulveda. Right now, it's pretty smooth sailing. If there's a vaccine, the traffic will be really intense again. How will this be accounted for in the EIR? Is there a way to study the traffic patterns on Sepulveda/Machado/Janisann/Jefferson during "normal" times? Is there tape or documentation of any kind showing what these intersections looked like pre-March 2020? It would be so inaccurate to study the density of traffic right now - utterly different due to the pandemic.

Thanks,
Shira Sergant
Studio Village Owner and Resident

Jessie Fan

From: BERNARD BRONSTEIN <bronstein84@verizon.net>
Sent: Tuesday, October 6, 2020 8:48 PM
To: Michael.Allen@culvercity.org
Cc: BERNARD BRONSTEIN
Subject: 11111 Jefferson Project Question

Regarding traffic assessment around this project, I hope you will add an assessment of the traffic situation at Sawtelle and Hayter which is likely to have an impact of cut-through traffic on Jannisan.

The flashing red light located at this intersection was installed after a fatal pedestrian traffic accident at nearby McDonald due to limited visibility coming over the bridge. Sunkist Park residents had long attempted to slow traffic on this Sawtelle curve and make it pedestrian friendly with El Marino School and Park being one short block away. Gabe Kaplan and then Mayor Jeff Cooper proposed the flashing red light as a temporary solution, with the intent of installing a sensor-driven traffic signal that would automatically stop thru traffic when approached by a speeding vehicle, as well as to allow safe pedestrian crossings and left turns toward the school. Such a complex traffic signal needed to be budgeted. The flashing red light has done its job well and the neighborhood has been very happy with it, so the city has not followed through with the upgraded signal. The proposed development at 11111 Jefferson may change that assessment, particularly for residents on Jannisan.

I suggest that this potential signal upgrade be reviewed in light of the impact of the new development. Please note that when Sawtelle was reconstructed after replacement of its pipeline, conduits to support such measures were installed at both Hayter and McDonald. I look forward to your response.

Bernie Bronstein
310-237-3407
bronstein84@verizon.net

Jessie Fan

From: Anita First <afirst@goldenoutcomes.com>
Sent: Tuesday, October 6, 2020 9:12 PM
To: Michael.Allen@culvercity.org; Charles.Herbertson@culvercity.org
Subject: OBJECTION to project known as "11111 Jefferson Boulevard Mixed-Use Project"
Attachments: Jefferson Triangle Mixed Use Project - OBJECTION Letter from Anita First 10-6-20 SIGNED.pdf

Dear Mr. Allen and Mr. Herbertson:

Please see my attached objection letter to the above referenced project.

This development will be a disaster for the current residents of Culver City and will do harm to local businesses, create tremendous traffic pollution, negatively impact our air quality, require a tremendous commitment of our sewage treatment resources and demand vast quantities of our precious water resources. Please do not allow this development to proceed.

Very truly yours,

Anita First
5009 Rainbows End
Culver City, CA 90230

Anita First
Anita First Law Corporation, Inc.
5009 Rainbows End
Culver City, CA 90230
310-339-7272
afirst@goldenoutcomes.com

October 6, 2020

Michael Allen
Current Planning Manager
City of Culver City Current Planning Division
9770 Culver Blvd.
Culver City, CA 90232
Email: Michael.allen@culvercity.org

Charles Herbertson
Public Works Director / City Engineer
City Hall
9770 Culver Blvd., 2nd Floor
Culver City, CA 90232
Email: Charles.Herbertson@culvercity.org

Dear Mr. Allen, Mr. Herbertson and Members of the City Council of Culver City:

I OBJECT TO THE PROJECT KNOWN AS THE “11111 JEFFERSON BOULEVARD MIXED-USE PROJECT” TO BE LOCATED AT 11111 JEFFERSON BOULEVARD, CULVER CITY, CA 90230 (“Project”).

I understand that the City of Culver City Planning Division is preparing various reports including an environmental impact report with respect to the Project. I also understand that the developer of the Project is attempting to begin construction on the Project in the second quarter of 2022.

I have lived in the Culver City area since 2003. I live in the Raintree community which is east of Jefferson and Overland. I also have my law offices in my home. This Project will cause tremendous traffic as well as reduction in air quality and reduction in the overall quality of life in Culver City.

The Project is intended to be bordered by Jefferson Boulevard, Machado and Sepulveda Boulevard. Jefferson Boulevard is the main thoroughfare for access to the west side of the City and the 405 Freeway for those of us who live east of where the Project is intended to be built.

With 230 residential units and ground floor retail including a gym and a market as well as office space, there will be a phenomenal increase in traffic at the corners of Jefferson

and Machado and Jefferson and Sepulveda. It will no longer be possible to cross those streets without hitting all of that traffic at various hours of the day and evening as commuters from the Project come and go from their offices and homes and from the stores, gym and market. Forcing a large complex onto that triangle of land which is a very significant focal point for traffic in multiple directions will be an inconvenience and a nuisance to the existing residents. Indeed, you may as well close off Jefferson at that location to all through traffic since that is what will effectively happen anyway. It is certainly the case that due to the traffic congestion that will be created, those needing to travel west from areas that are east of Overland will be forced to take Overland south and wind around the western entrance to West Los Angeles College and travel past El Rincon Elementary School and Holy Cross Cemetery to get to Sepulveda Boulevard and the 405 Freeway. The increased traffic will greatly affect all of the houses along that route as well as the traffic around the elementary school and the entrance to West LA College.

With so many new residential units and that much congestion, there is bound to be much worse air quality in the entire area including the area in which I live because of all of the cars and other transit services coming in and out of the Project. There is also certain to be additional noise in the area by virtue of the vehicles, the residents, the pets who will live there and the comings and goings of people who wish to access the stores and the gym. What a nuisance for the existing community!!

Culver City is known for its quiet and inviting communities. Except in the downtown area of Culver City, the charm of the city is that it is NOT built up like other cities where there is congestion and noise and poor quality of living. Creating a 5 story jungle building that towers over all of the surrounding area is inconsistent with the height and use of the other buildings in the area. This building will stick out like a sore thumb and will rob the community of both its local post office and the Coco's restaurant.

The main Culver City post office has been in that location for decades. It is a central and easy place for residents to travel to handle all postal needs with good parking and easy access from all directions. Removing that post office will be an inconvenience for residents, especially since the only other post office in Culver City will then be the station at 9942 Culver Boulevard. That location is harder to access and is not centrally located. Additionally, having only ONE post office for all of Culver City is not sufficient to meet the needs of the community.

Removing a thriving business like Coco's is very bad for the local community. I used to visit Culver City when I was younger, and I remember well how the Sepulveda / Jefferson / Machado corner had the Bob's Big Boy restaurant which was beloved and always crowded. The corner where you want to build the Project has now hosted Coco's for several years since Coco's took over from Bob's Big Boy. Therefore, that corner has had a staple and stable type of chain restaurant for YEARS which has served the community with reasonably priced and tasty meals. This type of reliable and reasonably priced restaurant is especially important for the elderly who live in Culver City and for families with children.

Other than the Denny's restaurant at Jefferson and Overland, there is NO other diner type of restaurant serving the community! Therefore, eliminating Coco's will be a disaster for residents. The Roll & Rye diner which was across the street from the location where Coco's is was closed about 5 years ago, and the Junior's Deli on Overland and Pico closed a year or so ago. If you eliminate Coco's, you will be taking away a restaurant which has extended hours, is open 7 days a week and where MANY residents go to eat due to the easy parking and the reasonable prices. Adding a restaurant into the Project will not be an invitation for anyone in the community to eat there other than the residents in the Project itself. It is certain that the price of the food and the hassle of the parking will be a deterrent to non-Project Culver City residents. It is unlikely that the elderly population of Culver City or the lower income residents or the residents with multiple family members could afford to eat in the Project restaurant(s).

I assume that the following reports will be required from the developer of the Project and that those reports will be made available to members of the public for review with time to make appropriate objections as needed:

1. Survey plan – Prepared by a registered surveyor to show the property where the Project will be built as it currently is with lot dimensions, topographical details, height details, where trees are located and any easements;
2. Site plan – “Bird’s eye view” of the property where the Project will be built and what is being proposed on the site;
3. Floor plans - How will the floors of the Project be laid out and what uses will be made of the property at which locations;
4. Elevations – Showing the sides of the Project building in relation to the existing and proposed ground levels with information as to heights of window locations, privacy screens, etc.;
5. Sections plan – Showing the cross section of the building that will comprise the Project to identify the actual height of the building, the floors, the basement and identify the excavation of the site;
6. Shadow diagrams – Showing on December 21st at 9 am, 12 pm and 3 pm (date of the winter solstice) the worst case scenario for shadows since this is the shorter amount of daylight and the longest shadows of the year;
7. Statement of environmental impact – Showing how the Project will impact the community from an environmental point of view and how the Project “matches” to other buildings in the community at that location;

8. Fire hazard report – Showing how the Project will be constructed to avoid fire danger to the surrounding community since a fire in a Project of this size would have a devastating impact on the surrounding neighborhoods and businesses;
9. Storm water management plan – Showing how the site for the Project will handle storm water and rain runoff so that the storm water will not impact surrounding properties onto which any water from this Project may drain;
10. Arborist report – Showing what trees will be removed from the site and other vegetation that will be removed and what impact there will be as a result;
11. Traffic report – Outlining the impact that the Project will have on the local traffic network and detail the truck and vehicle movements for the site including internal vehicle movements;
12. Acoustic report – Showing the potential noise impact of the Project on surrounding neighbors and businesses;
13. Heritage impact report – Showing the impact on the community of removing the post office and Coco's which have both been on the site for 60 to 70 years; and
14. Geotechnical report – Showing any landslide or earthquake considerations.

I STRONGLY OBJECT TO ANY APPROVAL OF THE PROJECT AT THIS LOCATION. There are plenty of locations on the west side (and even the east side) of Sepulveda between Culver Boulevard and Jefferson Boulevard where there are strip malls and other low rise commercial buildings. These areas are a far better site for such combined residential / commercial development like the Project. Sepulveda is a busy thoroughfare with direct access all the way south to El Segundo and beyond and all the way north into the valley. A development in this alternate area would be less impactful on traffic and air quality, will allow the residents in such a development easy access to various parts of the city, will allow existing residents in Culver City to continue to use Jefferson Boulevard as it is used now without a blockade of traffic at all hours which a Project in the currently proposed location would cause and will allow Coco's to remain as the established cornerstone restaurant that it has become in Culver City serving its residents and visitors for decades.

Very truly yours,



Anita First

Anita First
Anita First Law Corporation, Inc.
5009 Rainbows End
Culver City, CA 90230
310-339-7272
afirst@goldenoutcomes.com

RECEIVED

OCT 14 2020

Culver City
Planning Division

October 6, 2020

Michael Allen
Current Planning Manager
City of Culver City Current Planning Division
9770 Culver Blvd.
Culver City, CA 90232
Email: Michael.allen@culvercity.org

Charles Herbertson
Public Works Director / City Engineer
City Hall
9770 Culver Blvd., 2nd Floor
Culver City, CA 90232
Email: Charles.Herbertson@culvercity.org

Dear Mr. Allen, Mr. Herbertson and Members of the City Council of Culver City:

I OBJECT TO THE PROJECT KNOWN AS THE “11111 JEFFERSON BOULEVARD MIXED-USE PROJECT” TO BE LOCATED AT 11111 JEFFERSON BOULEVARD, CULVER CITY, CA 90230 (“Project”).

I understand that the City of Culver City Planning Division is preparing various reports including an environmental impact report with respect to the Project. I also understand that the developer of the Project is attempting to begin construction on the Project in the second quarter of 2022.

I have lived in the Culver City area since 2003. I live in the Raintree community which is east of Jefferson and Overland. I also have my law offices in my home. This Project will cause tremendous traffic as well as reduction in air quality and reduction in the overall quality of life in Culver City.

The Project is intended to be bordered by Jefferson Boulevard, Machado and Sepulveda Boulevard. Jefferson Boulevard is the main thoroughfare for access to the west side of the City and the 405 Freeway for those of us who live east of where the Project is intended to be built.

With 230 residential units and ground floor retail including a gym and a market as well as office space, there will be a phenomenal increase in traffic at the corners of Jefferson

and Machado and Jefferson and Sepulveda. It will no longer be possible to cross those streets without hitting all of that traffic at various hours of the day and evening as commuters from the Project come and go from their offices and homes and from the stores, gym and market. Forcing a large complex onto that triangle of land which is a very significant focal point for traffic in multiple directions will be an inconvenience and a nuisance to the existing residents. Indeed, you may as well close off Jefferson at that location to all through traffic since that is what will effectively happen anyway. It is certainly the case that due to the traffic congestion that will be created, those needing to travel west from areas that are east of Overland will be forced to take Overland south and wind around the western entrance to West Los Angeles College and travel past El Rincon Elementary School and Holy Cross Cemetery to get to Sepulveda Boulevard and the 405 Freeway. The increased traffic will greatly affect all of the houses along that route as well as the traffic around the elementary school and the entrance to West LA College.

With so many new residential units and that much congestion, there is bound to be much worse air quality in the entire area including the area in which I live because of all of the cars and other transit services coming in and out of the Project. There is also certain to be additional noise in the area by virtue of the vehicles, the residents, the pets who will live there and the comings and goings of people who wish to access the stores and the gym. What a nuisance for the existing community!!

Culver City is known for its quiet and inviting communities. Except in the downtown area of Culver City, the charm of the city is that it is NOT built up like other cities where there is congestion and noise and poor quality of living. Creating a 5 story jungle building that towers over all of the surrounding area is inconsistent with the height and use of the other buildings in the area. This building will stick out like a sore thumb and will rob the community of both its local post office and the Coco's restaurant.

The main Culver City post office has been in that location for decades. It is a central and easy place for residents to travel to handle all postal needs with good parking and easy access from all directions. Removing that post office will be an inconvenience for residents, especially since the only other post office in Culver City will then be the station at 9942 Culver Boulevard. That location is harder to access and is not centrally located. Additionally, having only ONE post office for all of Culver City is not sufficient to meet the needs of the community.

Removing a thriving business like Coco's is very bad for the local community. I used to visit Culver City when I was younger, and I remember well how the Sepulveda / Jefferson / Machado corner had the Bob's Big Boy restaurant which was beloved and always crowded. The corner where you want to build the Project has now hosted Coco's for several years since Coco's took over from Bob's Big Boy. Therefore, that corner has had a staple and stable type of chain restaurant for YEARS which has served the community with reasonably priced and tasty meals. This type of reliable and reasonably priced restaurant is especially important for the elderly who live in Culver City and for families with children.

Other than the Denny's restaurant at Jefferson and Overland, there is NO other diner type of restaurant serving the community! Therefore, eliminating Coco's will be a disaster for residents. The Roll & Rye diner which was across the street from the location where Coco's is was closed about 5 years ago, and the Junior's Deli on Overland and Pico closed a year or so ago. If you eliminate Coco's, you will be taking away a restaurant which has extended hours, is open 7 days a week and where MANY residents go to eat due to the easy parking and the reasonable prices. Adding a restaurant into the Project will not be an invitation for anyone in the community to eat there other than the residents in the Project itself. It is certain that the price of the food and the hassle of the parking will be a deterrent to non-Project Culver City residents. It is unlikely that the elderly population of Culver City or the lower income residents or the residents with multiple family members could afford to eat in the Project restaurant(s).

I assume that the following reports will be required from the developer of the Project and that those reports will be made available to members of the public for review with time to make appropriate objections as needed:

1. Survey plan – Prepared by a registered surveyor to show the property where the Project will be built as it currently is with lot dimensions, topographical details, height details, where trees are located and any easements;
2. Site plan – “Bird's eye view” of the property where the Project will be built and what is being proposed on the site;
3. Floor plans - How will the floors of the Project be laid out and what uses will be made of the property at which locations;
4. Elevations – Showing the sides of the Project building in relation to the existing and proposed ground levels with information as to heights of window locations, privacy screens, etc.;
5. Sections plan – Showing the cross section of the building that will comprise the Project to identify the actual height of the building, the floors, the basement and identify the excavation of the site;
6. Shadow diagrams – Showing on December 21st at 9 am, 12 pm and 3 pm (date of the winter solstice) the worst case scenario for shadows since this is the shorter amount of daylight and the longest shadows of the year;
7. Statement of environmental impact – Showing how the Project will impact the community from an environmental point of view and how the Project “matches” to other buildings in the community at that location;

8. Fire hazard report – Showing how the Project will be constructed to avoid fire danger to the surrounding community since a fire in a Project of this size would have a devastating impact on the surrounding neighborhoods and businesses;
9. Storm water management plan – Showing how the site for the Project will handle storm water and rain runoff so that the storm water will not impact surrounding properties onto which any water from this Project may drain;
10. Arborist report – Showing what trees will be removed from the site and other vegetation that will be removed and what impact there will be as a result;
11. Traffic report – Outlining the impact that the Project will have on the local traffic network and detail the truck and vehicle movements for the site including internal vehicle movements;
12. Acoustic report – Showing the potential noise impact of the Project on surrounding neighbors and businesses;
13. Heritage impact report – Showing the impact on the community of removing the post office and Coco's which have both been on the site for 60 to 70 years; and
14. Geotechnical report – Showing any landslide or earthquake considerations.

I STRONGLY OBJECT TO ANY APPROVAL OF THE PROJECT AT THIS LOCATION. There are plenty of locations on the west side (and even the east side) of Sepulveda between Culver Boulevard and Jefferson Boulevard where there are strip malls and other low rise commercial buildings. These areas are a far better site for such combined residential / commercial development like the Project. Sepulveda is a busy thoroughfare with direct access all the way south to El Segundo and beyond and all the way north into the valley. A development in this alternate area would be less impactful on traffic and air quality, will allow the residents in such a development easy access to various parts of the city, will allow existing residents in Culver City to continue to use Jefferson Boulevard as it is used now without a blockade of traffic at all hours which a Project in the currently proposed location would cause and will allow Coco's to remain as the established cornerstone restaurant that it has become in Culver City serving its residents and visitors for decades.

Very truly yours,



Anita First

CREEDLA

October 6, 2020

Via Email and U.S. Mail

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

RECEIVED

OCT 14 2020

Culver City
Planning Division

**RE: Public Records Act Request and Request for Mailed Notice of Public Hearings
and Actions –1111 Jefferson Boulevard Culver City, CA 90230**

Dear Mr. Allen,

CREED LA is writing to request a copy of any and all records related to the project on 1111 Jefferson Boulevard in Culver City. The project will be a 5-story building with 230 residential units, 55,000 sf of ground-floor retail space, and 11,400 sf of office space. We are also writing to request copies of all communications and mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

U.S. Mail

Jeff Modrzejewski
CREED LA
501 Shatto Place, Suite 200
Los Angeles, CA. 90020

Email

Jeff@creedla.com

Please call me if you have any questions. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director

Jessie Fan

From: Sam Wald <sbwald@gmail.com>
Sent: Wednesday, October 7, 2020 3:50 PM
To: Michael.Allen@culvercity.org
Subject: 1111 Jefferson Blvd. Project - Public Comment

Hello Mr. Allen,

I am a resident of Heritage Park community. Thank you for dedication to our community. I am submitting the below per the public comment period for the 1111 Jefferson Blvd. Project (the "Jefferson Project").

1. Child Safety: The Heritage Park community is home to many small children as well as an elementary school. Children are always riding bikes, walking, playing in the neighborhood - it really is a throwback in a lot of ways. The Jefferson Project as currently designed will bring increased traffic to the neighborhood as it becomes a "cut through" to the Jefferson Project entrance on Machado. In addition, the retail space at Jefferson Project and inadequate parking (despite technical compliance with local laws") will make it a popular place for visitors of the Project to park their cars. All of this combined with the alcohol that will be sold at the planned bars and restaurants is a recipe for disaster. All it takes is one stupid decision of a Jefferson Project patron to speed, drive drunk, text while driving or some combination of all those for a child to be hit and injured/killed. This is a needless risk when there are ample ways to protect Heritage Park from this increased danger - many of which are outlined below. As currently designed, the Jefferson Project designers are being negligent at best and putting children in danger.

2. Machado Median: The initial study, on page 23, is showing the Machado median being modified to allow westbound traffic to turn left into the two entrances (residential and retail) of the complex. The modified median also appears to allow vehicle traffic to exit Heritage Place and cut across Machado to enter 11111.

As stated above, it is negligent and unreasonably dangerous to allow visitors to the Jefferson Project to use Heritage Park as a cut-through. The community roads inside Heritage Park are narrower than standard streets, with sidewalks only on one side.

Cut-through traffic would (i) be dangerous for the pedestrians and kids in the community, and (ii) unfairly increases the road maintenance and repair cost, which are paid for by Heritage Park. There are many ways to solve this including, reconfiguring the layout of the residential entrance and the Machado traffic median or having the developers commit to installing a gate at the Machado entrance of Heritage Park.

3. Vehicle Entrances on Jefferson vs Machado: In the initial study, the design did not have any vehicle entrance on Jefferson Blvd, but the most recent design has two entrances on Machado. This is a major problem.

The current design forces all traffic from Jefferson to turn into Machado, and then make an immediate left in order to enter the project. Same goes for exits. Visitors wishing to go south will need to exit Machado and then turn right onto Jefferson to Sepulveda. All the while competing with traffic cutting through between Sepulveda and Jefferson on a winding street. This will undoubtedly will create significant traffic jams and accidents on Machado and Jefferson.

One possible solution would be to move the vehicle entrances from Machado to Jefferson. This would reduce a lot of turns and traffic.

When we proposed this to the developers, they told us that they cannot put an entrance on Jefferson because Culver City said it was not allowed. I'm not sure if this is true, but I would encourage the City to re-visit this decision.

4. Neighborhood Traffic Management Program (NTMP): Per the developers, the Jefferson Project will be paying \$750,000 to Culver City for "Mobility Fund." As the closest community to 11111 project, Heritage Park will be

impacted by the increased vehicle and foot traffic. Please consider using those funds to protect the children of our community, with some ideas being: gate on Machado entrance, speed bumps, and permit parking.

5. Residential Guest Parking: The Culver City building code requires 1 guest parking for every 4 residential units in an apartment complex --- that would mean $230/4 = 58$ parking spots -- But the initial study document, on page 22, does not include residential guest parking. I would request that the EIR confirm that the Jefferson Project meet all city code requirements for guest parking.

6. Security: The Jefferson Project developers have admitted that security is a major concern for them. They have publicly committed to 24 hour security presence. Given the close proximity to Heritage Park, this means that security will be an issue for our community as well. I would ask that security concerns be taken into account as part of the EIR, and that the developers provide equal security for our neighborhood and children that they deem appropriate for their own interests.

Thanks again for your service.

Sincerely,

- Sam Wald

Jessie Fan

From: Thomas La France <tslaf01@gmail.com>
Sent: Thursday, October 8, 2020 9:00 AM
To: Michael.allen@culvercity.org
Cc: Tom La France
Subject: The Jefferson Triangle project

Michael,

Definitely necessary work. The postal staff work hard and they deserve a new more efficient facility. All we ask is try to keep traffic flowing and to minimise any environmental impacts as best you can. I would prioritise the Post Office to minimise our using alternative post office locations. It is vital to maintain adequate parking. When land area is limited the only way to grow is go up: witness Singapore etc..

Thank you, Tom La France ☺

Dr. T. S. La France
4805 Salem Village Ct.
Culver City, CA 90230

310 880 3851 cell

Jessie Fan

From: rgodfrey <rgodfrey@twc.com>
Sent: Thursday, October 8, 2020 12:36 PM
To: Michael.allen@culvercity.org
Subject: Jefferson triangle

Traffic on Jefferson Boulevard is already terrible. Adding 230 residential units so close to desirable residential locations will devalue those locations by increasing traffic, noise and pollution, not to speak of taking away our post office. This development must be rejected.

Roberta D. Godfrey
5027 Butterfield Court
Culver City, CA 90230
(Raintree)

Sent from [Mail](#) for Windows 10

Jessie Fan

From: Bauer, Marc <Marc.Bauer@culvercity.org>
Sent: Thursday, October 8, 2020 8:53 PM
To: Allen, Michael
Subject: 11111 Jefferson Project

Michael - My name is Marc Bauer and I serve on the FAC. In addition, I am a resident of Heritage Park (with my backyard being right on Machado) and am the VP of Facilities at Temple Akiba.

A few of my neighbors and I were wondering if we could virtually meet with you to pick your brain about how best effectively to get our concerns addressed by the developers and the City.

Any time or insight you could share would be appreciated.

Thank you.

Best,

Marc Bauer

Jessie Fan

From: Temple Akiba - Marc Bauer <marc@templeakiba.net>
Sent: Friday, October 16, 2020 1:39 PM
To: michael.allen@culvercity.org
Cc: Temple Akiba - Director; President @ Temple Akiba
Subject: 11111 Jefferson Project

Michael:

My name is Marc Bauer, and along with serving on the City's Finance Advisory Committee and being a resident of Heritage Park, I serve as the Vice President of Facilities of Temple Akiba. At Temple Akiba, we house an Early Childhood Center (or Preschool) every weekday throughout the year and afterschool activities for children from Kindergarten through High School various times during the week. In addition, we host weekly religious services, adult education classes, community events, and Temple gatherings, and is a workplace for over twenty people on a daily basis. The purpose of this letter is to communicate what items we would like examined in the City's EIR that will be done in connection with the 11111 Jefferson Project. What concerns us most relate to the impact on the construction on our operations. What we would like to see studied is as follows:

A) The amount of dust that will be put into the air across Sepulveda from playing preschoolers and its effect on children;

B) With the preschool being housed in the lower level (below ground) of our building, what impacts of vibrations and other impact on our below level will be affected by the excavation and creation of below level infrastructure on the 11111 Jefferson Project and their effect on children;

C) The pollution that will be created through the employment of construction trucks and heavy equipment and their effect on children;

D) The impact of having our only entrance to the facility and preschool being across the street from an active construction site;

E) The impact of construction (and the project itself) to the access to our parking lot, the entrances of which is located on Sepulveda, just North of Janisann, and on Janissan, just West of Sepulveda;

Thank you. Please feel free to reach out to me at this email address or at 310-994-6780.

Best,

Marc Bauer

Jessie Fan

From: Arthur Kassan <artraffic@aol.com>
Sent: Friday, October 9, 2020 11:22 AM
To: michael.allen@culvercity.org; charles.herbertson@culvercity.org
Subject: 11111Jefferson Boulevard
Attachments: jefferson triangle letter to city oct 8.docx

Attached is a copy of the letter that I sent to you today by regular mail.

Arthur Kassan

ARTHUR L. KASSAN, P.E.
Consulting Traffic Engineer

5105 Cimarron Lane
Culver City, CA 90230

October 9, 2020

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

Subject: Proposed Mixed-Use Development at 11111 Jefferson Boulevard

Dear Mr. Allen:

I have reviewed the “Initial Study” report for the subject development, particularly Appendix A, Project Description, and attended the October 6th Zoom meetings. Many of my concerns regarding the transportation aspects of the development were satisfactorily addressed during the meetings. Having reviewed the information that has so far been provided, I have the following comments and questions.

PUBLIC TRANSIT

The information in Appendix A of the “Initial Study” regarding the Culver City Bus lines is substantially misleading and will lead to incorrect conclusions regarding the development traffic generation. Five bus lines are described as those that “... travel along the Project Site frontages...” In fact, only two of those lines – Line 4 on Jefferson Boulevard and Line 6 on Sepulveda Boulevard – pass the site on weekdays, the days for which the traffic analyses will be done. Instead,

Line 2: The closest it comes to the site is the Jefferson Boulevard/Slauson Avenue intersection, 2,400 feet (almost half a mile) from the site.

Line 3: On weekdays, the closest it comes to the site is the Hannum Avenue/Playa Street intersection, 2,300 feet from the site. The line stops adjacent to the site on Saturdays and Sundays, but those are not the days for which the impact analyses will be done.

Line 5: The closest it comes to the site is the Sepulveda Boulevard/Braddock Avenue intersection, 4,700 feet (nine-tenths of a mile) from the site.

None of those three bus lines fits the description in the “Initial Study”. The trip generation estimates used in the impact analyses must not include adjustments for the three bus lines that do not travel close to the site.

PROPOSED TRAFFIC SIGNAL

The installation of a traffic signal is proposed on Sepulveda Boulevard at the intersection with Janisann Avenue and the proposed development driveway opposite that street. As expected, the purpose of that signal is to serve the retail component traffic leaving the development. However, the new signal will have traffic impacts on both Sepulveda Boulevard and Janisann Avenue.

1. Along Sepulveda Boulevard, the close spacing of signals at Machado Road, Janisann Avenue, Jefferson Boulevard, and Sawtelle Boulevard will result in less-than-efficient traffic flow operations. Many vehicles on Sepulveda Boulevard will be required to stop at two or three of the intersections because of problems in signal coordination over time. An example of such problems currently occurs along Jefferson Boulevard between Duquesne Avenue and Overland Avenue, where many through vehicles on Jefferson Boulevard have to stop at several intersections because of inefficient signal coordination.
2. The new signal will attract neighborhood traffic to Janisann Avenue as a route to northbound Sepulveda Boulevard via a left turn at the signal. Janisann Avenue will become a collector street for the neighborhood, instead of the local street that it functions as now. A similar situation exists on Jefferson Boulevard at Cota Street, where that street attracts more than its share of neighborhood traffic because of the traffic signal.

TRAFFIC DIVERSION

1. The addition of substantial development-generated traffic to the intersection of Jefferson Boulevard and Sepulveda Boulevard will cause many drivers from northeast of the site to choose alternative routes to travel to and from destinations in southern Culver City and beyond, including Westfield Mall and the airport. One attractive alternative route to the south will be Jefferson Boulevard – Overland Avenue – Playa Street – Sepulveda Boulevard, bypassing the congestion at the southern tip of the development site. The traffic impact study should take this and other potential diversion routes into account and analyze the impacts. A street segment impact analysis should be done on Overland Avenue south of Jefferson Boulevard.
2. The Post Office, currently located on the development site, is an asset to southern Culver City and should be replaced at a suitable nearby location with adequate parking. The impacts of diverting Post Office traffic from the development site to a reasonable candidate location should be analyzed as part of the development impact study.

DEVELOPMENT PARKING

1. How was the parking requirement for each individual size of residential unit (studios, 1- bedroom, 2- bedroom) calculated? The proposed residential parking supply shown in the “Initial Study” averages only 1.34 parking spaces per residential unit. The developer’s representative at the Zoom meeting said that the number of spaces proposed is based on one space per bedroom. In many one-bedroom units, there will be two resident adults, and each will have a vehicle to be parked on-site. This development cannot be considered to be similar to the several new residential developments on Washington Boulevard east of downtown. Those developments are a reasonable walk from the Expo Line rail station, and many residents will not need individual vehicles to commute. At the subject development, however, the transit service will be by bus only with only two lines serving the development and long headways between buses. Transit use will be less attractive than at the

Washington Boulevard developments, and more residents will find it necessary to have vehicles available for commuting.

2. How many guest parking spaces will be required for the residential component? How will they be controlled to assure that residents do not use them for their own vehicles? Will the spaces be in an area that is separated from the residents' assigned parking spaces? How will the availability of on-site guest parking be communicated to the guest drivers?

3. How will overflow parking demand from the development be accommodated? There are no on-street spaces planned for any of the three site frontages. Will overflow parkers, such as guests or residents without assigned spaces, be expected to park in the nearby shopping center or in the neighborhood to the west, e.g., along Janisann Avenue? What would be the impacts of overflow parking on the shopping center parking supply and on the on-street parking within the neighborhood?

4. The two public parks are meant to be attractive to visitors from throughout the City. Where will they park while enjoying the parks?

TRUCK SERVICE FOR RETAIL

1. As there will be no on-street parking or loading zones, all truck service will have to be on-site. No truck loading facilities are shown for either of the two small retail buildings in the southern part of the site. Where will those stores take deliveries? If in the parking lot, the trucks will block parking space access and circulation for customers. Properly-sized truck facilities must be provided for the several small stores shown, and any parking spaces that are lost in order to provide those facilities must be replaced conveniently elsewhere on-site.

2. The truck dock for the proposed market is shown at the worst possible location – immediately adjacent to the northern edge of the development and immediately west of the Machado Road driveway that will serve the retail customer parking. Large trucks entering the dock area will have to back in across the driveway, blocking incoming traffic from the street. That will be dangerous, because car drivers making their turns from the bright daylight of the street will not readily be able to see trucks maneuvering in the lower lighting levels within the garage. All trucks leaving the dock area could be blocked by cars queuing in the driveway to leave the garage and turn onto the street. Alternatively, the maneuvering of those trucks will block cars in the driveway heading to the street. Either way, the hazards and inefficiencies of flows will be substantial. The truck dock should be moved to the southern part of the market, as far from the Machado Road driveway as possible.

Thank you for the opportunity to comment on the proposed development and to provide recommendations for analyses to be included in the Environmental Impact Report. If you wish to contact me, my email address is artraffic@aol.com and my telephone number is 310-558-0808.

Very truly yours,

Arthur L. Kassan, Registered Traffic Engineer No. 152

c: Mr. Charles Herbertson, P.E.

Jessie Fan

From: El-Guindy, Heba <Heba.El-Guindy@culvercity.org>
Sent: Wednesday, October 14, 2020 12:29 PM
To: Arthur Kassan; Allen, Michael
Cc: Herbertson, Charles
Subject: RE: 11111 Jefferson Boulevard

Good morning,

I was about to e-mail your letter to the traffic consultant, I will include both correspondence for attention of the project representatives.

Thank you,
Heba

Heba El-Guindy, TE
Mobility and Traffic Engineering Manager
Public Works Department
9770 Culver Boulevard
Culver City, CA 90230-0507
✉ Heba.El-Guindy@culvercity.org
☎ 310-253-5628

From: Arthur Kassan <artraffic@aol.com>
Sent: Wednesday, October 14, 2020 12:26 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Cc: Herbertson, Charles <charles.herbertson@culvercity.org>; El-Guindy, Heba <Heba.El-Guindy@culvercity.org>
Subject: 11111 Jefferson Boulevard

Please accept the following comments as an addendum to my letter of October 9, that was posted and emailed to you on that date.

TRUCK SERVICE FOR OFFICES AND RESIDENCES

1. Where will the truck loading/unloading area for the offices be located? Offices receive written materials/supplies/equipment/furniture throughout the business day. Most office complexes receive several UPS, FedEx, and Amazon deliveries each day. Where will those, and other company trucks, park? According to the developer's proposal, curbside stopping, even for truck loading/unloading, will not be permitted on any of the three streets surrounding the site. Will the trucks be able to enter the on-site parking and travel to the second level, where the offices will be located? Will the ceiling height on the second-level parking be high enough to accommodate the tall trucks used by UPS and FedEx and others? If the trucks cannot use the second level, where will they park otherwise - on the first level where they will interfere with retail vehicle parking and circulation? It does not appear that sufficient consideration has been given to the truck service for the office component.

Two types of trucks will service the residential component of the development - moving vans and merchandise delivery vehicles.

2. After the initial move-in period for the residences, there will be the typical turnover in apartment occupancy, estimated at approximately 20% per year for the small units planned. That will average approximately one moving van for the leaving residents and one moving van for the incoming residents per week. Typically, moving vans are long and tall, and they must be parked for significant durations during the moving process. Will typical moving vans be accommodated in the residential parking facility? Will on-site ramps and circulation be sized for such vehicles? Are the ceiling heights

adequate? Will there be space for the vans to park, or will the movers have to commandeer several residents' spaces? Or will the movers disregard the no stopping regulations on the surrounding streets and park their vehicles in the traffic lanes, partially blocking traffic flow for the durations of their moving activities? Again, it appears that this foreseeable situation has not been accounted for in the design of the proposed development.

3. Residents receive commercial deliveries throughout the day. With the skyrocketing growth of on-line sales, that will only increase substantially over time. That means more UPS, FedEx, Amazon, and other company trucks arriving and departing to service the residences. Where will they park? All of the questions related to moving vans, above, apply to those trucks as well. UPS and FedEx drivers are well-known for using the parking facilities that are most efficient for them, without regard to obeying parking regulations. Without a specified on-site facility, it can be anticipated that those trucks will be stopped at the curbs along the streets many times per day, blocking traffic flow and resulting in unsafe lane changes by passing vehicles.

4. There isn't a place for the U. S. Postal Service to park their vehicle during the deliveries to all of the individual retail/office/residential users that will occupy the site. How can that be overlooked?

Please include the above comments in my submittal re: the proposal. Thank you.

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

RECEIVED

OCT 14 2020

Culver City
Planning Division

ARTHUR L. KASSAN, P.E.
Consulting Traffic Engineer

5105 Cimarron Lane
Culver City, CA 90230

October 9, 2020

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

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Line 3: On weekdays, the closest it comes to the site is the Hannum Avenue/Playa Street intersection, 2,300 feet from the site. The line stops adjacent to the site on Saturdays and Sundays, but those are not the days for which the impact analyses will be done.

Line 5: The closest it comes to the site is the Sepulveda Boulevard/Braddock Avenue intersection, 4,700 feet (nine-tenths of a mile) from the site.

None of those three bus lines fits the description in the "Initial Study". The trip generation estimates used in the impact analyses must not include adjustments for the three bus lines that do not travel close to the site.

PROPOSED TRAFFIC SIGNAL

The installation of a traffic signal is proposed on Sepulveda Boulevard at the intersection with Janisann Avenue and the proposed development driveway opposite that street. As expected, the purpose of that signal is to serve the retail component traffic leaving the development. However, the new signal will have traffic impacts on both Sepulveda Boulevard and Janisann Avenue.

1. Along Sepulveda Boulevard, the close spacing of signals at Machado Road, Janisann Avenue, Jefferson Boulevard, and Sawtelle Boulevard will result in less-than-efficient traffic flow operations. Many vehicles on Sepulveda Boulevard will be required to stop at two or three of the intersections because of problems in signal coordination over time. An example of such problems currently occurs along Jefferson Boulevard between Duquesne Avenue and Overland Avenue, where many through vehicles on Jefferson Boulevard have to stop at several intersections because of inefficient signal coordination.

2. The new signal will attract neighborhood traffic to Janisann Avenue as a route to northbound Sepulveda Boulevard via a left turn at the signal. Janisann Avenue will become a collector street for the neighborhood, instead of the local street that it functions as now. A similar situation exists on Jefferson Boulevard at Cota Street, where that street attracts more than its share of neighborhood traffic because of the traffic signal.

TRAFFIC DIVERSION

1. The addition of substantial development-generated traffic to the intersection of Jefferson Boulevard and Sepulveda Boulevard will cause many drivers from northeast of the site to choose alternative routes to travel to and from destinations in southern Culver City and beyond, including Westfield Mall and the airport. One attractive alternative route to the south will be Jefferson Boulevard – Overland Avenue – Playa Street – Sepulveda Boulevard, bypassing the congestion at the southern tip of the development site. The traffic impact study should take this and other potential diversion routes into account and analyze the impacts. A street segment impact analysis should be done on Overland Avenue south of Jefferson Boulevard.

2. The Post Office, currently located on the development site, is an asset to southern Culver City and should be replaced at a suitable nearby location with adequate parking. The impacts of diverting Post Office traffic from the development site to a reasonable candidate location should be analyzed as part of the development impact study.

DEVELOPMENT PARKING

1. How was the parking requirement for each individual size of residential unit (studios, 1- bedroom, 2- bedroom) calculated? The proposed residential parking supply shown in the "Initial Study" averages only 1.34 parking spaces per residential unit. The developer's representative at the Zoom meeting said that the number of spaces proposed is based on one space per bedroom. In many one-bedroom units, there will be two resident adults, and each will have a vehicle to be parked on-site. This development cannot be considered to be similar to the several new residential developments on Washington Boulevard east of downtown. Those developments are a reasonable walk from the Expo Line rail station, and many residents will not need individual vehicles to commute. At the subject development, however, the transit service will be by bus only with only two lines serving the development and long headways between buses. Transit use will be less attractive than at the Washington Boulevard developments, and more residents will find it necessary to have vehicles available for commuting.

2. How many guest parking spaces will be required for the residential component? How will they be controlled to assure that residents do not use them for their own vehicles? Will the spaces be in an area that is separated from the residents' assigned parking spaces? How will the availability of on-site guest parking be communicated to the guest drivers?

3. How will overflow parking demand from the development be accommodated? There are no on-street spaces planned for any of the three site frontages. Will overflow parkers, such as guests or residents without assigned spaces, be expected to park in the nearby shopping center or in the neighborhood to the west, e.g., along Janisann Avenue? What would be the impacts of overflow parking on the shopping center parking supply and on the on-street parking within the neighborhood?

4. The two public parks are meant to be attractive to visitors from throughout the City. Where will they park while enjoying the parks?

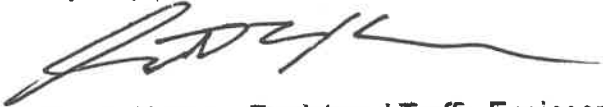
TRUCK SERVICE FOR RETAIL

1. As there will be no on-street parking or loading zones, all truck service will have to be on-site. No truck loading facilities are shown for either of the two small retail buildings in the southern part of the site. Where will those stores take deliveries? If in the parking lot, the trucks will block parking space access and circulation for customers. Properly-sized truck facilities must be provided for the several small stores shown, and any parking spaces that are lost in order to provide those facilities must be replaced conveniently elsewhere on-site.

2. The truck dock for the proposed market is shown at the worst possible location – immediately adjacent to the northern edge of the development and immediately west of the Machado Road driveway that will serve the retail customer parking. Large trucks entering the dock area will have to back in across the driveway, blocking incoming traffic from the street. That will be dangerous, because car drivers making their turns from the bright daylight of the street will not readily be able to see trucks maneuvering in the lower lighting levels within the garage. All trucks leaving the dock area could be blocked by cars queuing in the driveway to leave the garage and turn onto the street. Alternatively, the maneuvering of those trucks will block cars in the driveway heading to the street. Either way, the hazards and inefficiencies of flows will be substantial. The truck dock should be moved to the southern part of the market, as far from the Machado Road driveway as possible.

Thank you for the opportunity to comment on the proposed development and to provide recommendations for analyses to be included in the Environmental Impact Report. If you wish to contact me, my email address is artraffic@aol.com and my telephone number is 310-558-0808.

Very truly yours,



Arthur L. Kassan, Registered Traffic Engineer No. 152

c: Mr. Charles Herbertson, P.E.

Jessie Fan

From: k <heal5111@gmail.com>
Sent: Sunday, October 11, 2020 9:58 AM
To: Michael.allen@culvercity.org
Subject: Re: Jefferson Triangle Project

CORRECTS TYPO IN SUBJECT LINE

> On Oct 10, 2020, at 12:38 PM, k <heal5111@gmail.com> wrote:

>

> Mr. Allen,

>

> I've lived in Culver City for the past 30 years and have been extremely disappointed recently with all the new, huge projects going on in and around the city. The once great quality of life has been degraded to a point that even the great weather can't be an off set. The list continues to grow: Jefferson and La Cienega, National and Venice Boulevard, Washington and National, Jefferson and National, Overland and Washington, all along Overland north of Venice Boulevard just to mention a few.

>

> Now a developer wants to put up a 5 story multi use building at Jefferson and Sepulveda that would lord over the surrounding area and be totally out of character for the neighborhood. This is again another project increasing the density without increasing the capability of the surrounding streets and roads to keep them from being overwhelmed. This will lead to an increase in pollution and more nightmare congestion.

>

> This project needs to be stopped or at the very least scaled back to minimize the cumulative impacts that will effect not only the immediate area but areas for miles around.

Jessie Fan

From: Ron Olson <roje3olson@gmail.com>
Sent: Monday, October 12, 2020 1:00 PM
To: Allen, Michael
Subject: Re: 1111 Jefferson Blvd

Dear Mr. Allen,

Please ensure the traffic study is not occurring during the pandemic. The schools and businesses are closed and the airports are only operating at 30% capacity. Sepulveda is a major thoroughfare to the airport, especially in the area of 1111 Jefferson . Thank you for your prompt response. I hope the report includes the dates of the traffic study.

Sincerely,

Ronald and Jeanette Olson

Sent from my iPad

On Oct 12, 2020, at 8:50 AM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning,

Thank you, I am in receipt of your below concerns/questions regarding the 11111 Jefferson Mixed Use Project, specifically as it relates to the traffic, congestion, and public service impacts of the project.

Accordingly, I will forward to the environmental team, as well as the project developer/applicant for their review, and for inclusion to the full EIR as appropriate.

Thank you!

Best,

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

From: Ron Olson <roje3olson@gmail.com>
Sent: Saturday, October 10, 2020 2:34 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: 1111 Jefferson Blvd

Dear Mr. Allen,

We are very much against the proposed development of 1111 Jefferson Blvd. The traffic in that area is already a dangerous situation both on Sepulveda Blvd. and Mercado Road. The air and noise pollution would dramatically increase. It would create a strain on our public services such as police and fire personnel. Please do not allow such a massive development to be approved. Thank you for your consideration on this very important matter.

Sincerely,

Ronald and Jeanette Olson
Raintree Townhouse Residents

Sent from my iPad

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

Jessie Fan

From: Stephen and Sandy Schwartz <ssschwar@pacbell.net>
Sent: Monday, October 12, 2020 1:16 PM
To: michael.allen@culvercity.org
Subject: 11111 Jefferson Boulevard Mixed-Use Project
Attachments: 11111 Jefferson Blvd..docx

I attached my comments and concerns about this project. Feel free to contact me if you have questions.

Stephen Schwartz

October 12,2020

To: Michael Allen, Planning Manger
City of Culver City Planning Division

Subject: 11111 Jefferson Blvd.

I attended the Zoom Scoping meeting and found the developer presentation very interesting. As a longtime resident of Culver City and as a former planning commissioner I left with a bunch of questions and concerns. I personally feel that the development, as it is presently proposed, is too dense, the height is excessive, and the number of parking spaces is insufficient.

I know that the new generation supposedly feels we need to utilize public transportation more and not own or rely on the automobile as our principle mode of transportation. The mix of units is again, in my opinion, doesn't make sense. There are way too many single units. I also would like to see more low income units. I understand the concerns of the residents in Studio Estates about the there being an ingress and egress point on Machado Road and the impact this development will have on their area. I believe that the developer's plans for the type and amount of commercial uses is based on the residents of the project being the principal customers. The concept of putting a "market" in the development doesn't make sense since we have 2 Traders Joe's, 2 Ralphs, 1 Sprouts, 1 Pavilions, 1 AM PM, 1 7-11 and any number of small ethnic markets within a mile or so. These are all within walking distance and all of them are served by public transportation. I was happy to see that the developer was planning on putting a traffic light on the corner of Sepulveda and Janisann but I agree with the residents of that area that their neighborhood will be used as a cut through to Sawtelle and the 405 on ramp. If this development is allowed to be constructed, the city should block off Janisann just after the alleyway.

Respectfully:

Stephen Schwartz
5001 Butterfield Court
Culver City

Jessie Fan

From: Ruth <rcimring@hotmail.com>
Sent: Monday, October 12, 2020 3:27 PM
To: Michael.allen@culvercity.org
Subject: Jefferson Triangle project

Dear Michael Allen,

I am writing as a resident of Culver City for twenty-one years to let you know how I feel about the Jefferson Triangle project in Culver City.

It is an extremely busy intersection and adding residential units and retail space would increase the number of people and cars tremendously. The traffic is already very heavy. I can't imagine adding that many more vehicles. Since Playa Vista was developed, the traffic on Jefferson Blvd. has more than doubled. At rush our it can be bumper to bumper. We don't need a huge new complex at that spot.

Sincerely,

Ruth Cimring

Jessie Fan

From: Lauren Varsano <lauren@varsrealestate.com>
Sent: Monday, October 12, 2020 5:00 PM
To: Michael.Allen@culvercity.org
Subject: EIR report comments

Dear Michael,

I am concerned about the traffic coming into Sunkist Park with the proposed 11111 Jefferson Blvd. project into our neighborhood. I live walking distance to the proposed project. At the October 6th meeting it was proposed that a traffic light would be installed Janisann and Sepulveda Blvds. and there may be a lot more cars moving through our small neighborhood to go through to the other side of Sawtelle Blvd. I also want to know if the city will propose putting in parking restrictions in our area to distract patrons who shop at 11111 Jefferson from parking in our neighborhood? I know one traffic study was done pre-Covid and I'm hoping the City will do another one in the not so distant future.

I hope that the city still plans on making adequate crossways for those of us in the community who would like to walk or bike over to the development with our families. I know one was proposed at Janisann Avenue but I hope the city maintains the crosswalk across the street by Temple Akiba as well.

Best regards,

Lauren Varsano
Vars Real Estate
Commercial Real Estate Services



[4309 Overland Avenue, Culver City CA 90230](https://www.varsrealestate.com)

Office: [424.258.5680](tel:424.258.5680)

Email: lauren@varsrealestate.com | www.varsrealestate.com

Please check us out on social media and leave a review! click on icons below. Thank you!



Jessie Fan

From: John Yao <ichiangyao@gmail.com>
Sent: Tuesday, October 13, 2020 9:38 PM
To: Allen, Michael
Subject: Re: 11111 Jefferson Project - Potential Conflict of Interest Inquiry

Dear Mr. Allen,

Thank you for your response. A couple of follow-up items:

1. Can the City please share a copy of last year's traffic report including assumptions, and the detailed counts including day and time?
2. In the 10/24/2019 mobility meeting, 4 of 10 existing intersections were rated as 'A' (free-flow traffic), which invited disbelief (and also some shouting in the room). In the 10/6/2020 meeting, Tom G. with Fehr & Peers said his firm will apply another method in the design manual as perhaps our intersections are more closely spaced. It appears that there is more than one way to analyze the traffic situation. Therefore, what type of reviews were conducted by the City to ensure the data and analyses are accurate? Should there be an independent review of this important traffic data/counts and the analyses performed to ensure accuracy, proper application of design methods, and credible results (particularly in the public eye)?

Thanks again for being responsive.

Sincerely

John Yao

On Tue, Oct 13, 2020 at 9:29 AM Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning Mr. Yao,

Thank you for raising the below question and concern, and seeking clarification.

As you have appropriately described, the work completed last year as well as to be completed currently related to the traffic is all being conducted by Fehr & Peers. Although this may seem like a conflict due to the perception that the previous work was done under separate contract last year; the work however has been conducted under the City's existing agreement with ESA (the environmental consultant) with Fehr & Peers as a sub to ESA, inclusive of the traffic counts conducted last year. All the associated work is reviewed under the City's agreement with ESA, by the City's staff (Traffic Engineers, and the Mobility and Traffic Engineering Division Manager) for accuracy.

If you have any additional questions, please do not hesitate to follow up with me.

Best,

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

From: John Yao <ichiangyao@gmail.com>
Sent: Monday, October 12, 2020 9:43 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: 11111 Jefferson Project - Potential Conflict of Interest Inquiry

Dear Mr. Allen,

I have a question after attending the scoping meeting for the 11111 Jefferson project. The below is based on what I learned from both the community mobility workshop on 10/24/2019 and the joint community & scoping meeting on 10/6/2020. If there is any inaccuracy in my understanding please let me know.

My understanding is that the traffic consultant, Fehr & Peers, performed the traffic counts and Level Of Service analyses (LOS) for the 11111 Jefferson developer. Fehr & Peers also presented the LOS results and local mobility options in the 10/24/2019 public meeting on behalf of the developer. Per the 10/6/2020 EIR scoping meeting, I understand that the same firm will conduct both the CEQA & non-CEQA traffic assessment for the 11111 Jefferson project on behalf of the City. Fehr & Peers will then use the same traffic data collected last year while working for the developer to do the assessment for the City. Per American Society of Civil Engineers (ASCE) Ethical Canon 4 (see excerpt below), it appears that there is a potential conflict of interest for Fehr & Peers to be involved on both sides of the same project for traffic analyses and transportation assessment. I would think that typically a developer's interest is in the completion of their development, while a City government provides oversight in the interest of the City's residents. Do you see a potential conflict? If you do not, I would appreciate an explanation as to why there is none.

ASCE Ethical Canons

Canon 4

Engineers shall act in professional matters for each employer or client as faithful agents or trustees, and shall avoid cor

**a. Engineers shall avoid all known or potential conflicts of interest with their employers or clients and shall promptly inform their ei
could influence their judgment or the quality of their services.**

**b. Engineers shall not accept compensation from more than one party for service
the same project, unless the circumstances are fully disclosed to and agreed to,**

Thanks in advance for your time and response.

Sincerely,

John Yao

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

Jessie Fan

From: Lijin Sun <LSun@aqmd.gov>
Sent: Wednesday, October 14, 2020 7:47 AM
To: michael.allen@culvercity.org
Subject: South Coast AQMD Staff NOP Comments for the 11111 Jefferson Boulevard Mixed-Use Project
Attachments: LAC200917-02 NOP 11111 Jefferson Boulevard Mixed-Use Project_20201014.pdf

Dear Mr. Allen,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of an Environmental Impact Report for the 11111 Jefferson Boulevard Mixed-Use Project (South Coast AQMD Control Number: LAC200917-02). Please contact me if you have any questions regarding these comments.

Thank you,
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Direct: (909) 396-3308
Fax: (909) 396-3324

**Please note that the building is closed to the public.*



South Coast Air Quality Management District

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

SENT VIA E-MAIL:

October 14, 2020

Michael.allen@culvercity.org

Michael Allen, Planning Manager
City of Culver City, Planning Department
9770 Culver Boulevard
Culver City, CA 90232

Notice of Preparation of an Environmental Impact Report for the 11111 Jefferson Boulevard Mixed-Use Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁸, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁹.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
LAC200917-02
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁹ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Jessie Fan

From: Leon Ramsey, Jr. <leon@mitchtsailaw.com>
Sent: Wednesday, October 14, 2020 5:00 PM
To: michael.allen@culvercity.org
Cc: Mitchell Tsai
Subject: COMMENT LETTER: 11111 Jefferson Boulevard Mixed-Use Project
Attachments: 20201014_SWRCC_CommentsonNOPandIS_FINAL.pdf

Good afternoon,

Please see attached regarding the above-referenced project.

Thank you,

Leon Ramsey Jr.

Paralegal / Office Manager
Mitchell M. Tsai, Attorney At Law
155 South El Molino Avenue
Suite 104
Pasadena, CA 91101
Office: (626) 381-9248
Phone: (626) 389-8320
Fax: (626) 389-5414
Email: leon@mitchtsailaw.com
Website: <http://www.mitchtsailaw.com>

*** Our Office Has Recently Moved. Please Note New Mailing Address ***

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P: (626) 381-9248
F: (626) 389-5414
E: mitch@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

155 South El Molino Avenue
Suite 104
Pasadena, California 91101

VIA U.S. MAIL & E-MAIL

October 14, 2020

City of Culver City, Planning Division
Attn: Michael Allen, Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Em: Michael.Allen@culvercity.org

RE: 11111 Jefferson Boulevard Mixed-Use Project – Notice of Preparation of Environmental Impact Report (SCH No. 2020090329)

Dear Mr. Allen,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Carpenters**”), my Office is submitting these comments on the City of Culver City (“**City**” or “**Lead Agency**”) Notice of Preparation of an Environmental Impact Report (“**NOP**”) and Initial Study (SCH No. 2020090329) for the 11111 Jefferson Boulevard Mixed-Use Project (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including in southern California, and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenter expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenter incorporates by reference all comments raising issues regarding the environmental impact report (“**EIR**”) submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 CA4th 173, 191

(finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should seriously consider proposing that the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

In addition, the City should require the Project to be built to standards exceeding the current 2019 California Green Building Code and 2020 County of Los Angeles Green Building Standards Code to mitigate the Project’s environmental impacts and to advance progress towards the State of California’s environmental goals.

I. **THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations (“**CCR**” or “**CEQA Guidelines**”) § 15002(a)(1).¹ “Its

¹ The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 150000 *et seq*, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal.3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. (*Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131.) As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449–450).

B. The Initial Study Fails to Provide All Required Information

Under CEQA Guidelines § 15063(d), an initial study must include in brief form:

- A description of the project, including its location;
- Identification of the environmental setting;
- Identification of the project's environmental effects by use of a checklist, matrix, or other method, with a brief explanation or reference to indicate the evidence supporting the checklist or matrix entries;
- A discussion of ways to mitigate the significant effects identified in the initial study;
- An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
- The names of the persons who prepared or participated in the initial study.

The Initial Study fails to identify the Project’s environmental settings for each of the impacts discussed. For example, the Initial Study concluded potentially significant impact without establishing the existing environmental setting for the traffic at the Project site. (Initial Study, p. B-37.) The Initial Study brushed aside many different topics as being “less than significant impact” or even “no impact” in a similar way, without providing the environmental setting for the Project.

The Initial Study also fails to discuss ways to mitigate the significant effects it identified. For example, the Initial Study concluded that the project will have potentially significant transportation impacts but does not propose any mitigation measures. (Initial Study, p. B-37.) The same is true for air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services (Fire and Police Protection), and tribal cultural resources. (See Initial Study.)

C. The EIR Should Discuss and Explain the Project’s Consistency with the State Density Bonus Law and the Land Use Impact of Permitting the Project to Exceed Current Density Standards

One of the required approvals for the Project includes a Density Bonus Request. (Initial Study, p. A-15.) The Initial Study provides that out of the Project’s 230 residential units, 19 would be affordable to very low income units. (*Id.*, p. 1.)

From the Initial Study, it’s not clear what the base number of units the Project site is permitted to have without the density bonus, which is an important number to know in calculating the appropriate number of density bonus units. Moreover, the Initial Study merely describes the 19 units as “affordable to very low income households” does not describe how many of those units will be very low income units and other levels of affordability. The EIR should discuss how the Project proposes to comply with the State Density Bonus Law

Moreover, the environmental impact report’s should discuss and find a significant impact on land use impacts of the Project’s increased density, as the density bonus is inconsistent with the City’s land use and zoning regulations *per se*. Permitting a project that exceeds the City’s density limits will have a significant land use impact.

The City must accurately disclose the above-noted information in the DEIR and ensure that the Project complies with the Density Bonus Law.

D. The EIR Should Review the Project’s Consistency with Regional Housing Plans, Sustainable Community Strategy and Regional Transportation Plans

CEQA Guidelines section 15125(d) requires that an environmental impact report “discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. *See also Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal. App. 5th 467, 543.

The EIR should thoroughly evaluate the consistency of this Project with the City’s General Plan, City’s Regional Housing Needs Assessment targets, Sustainable Community Strategy and Regional Transportation Plan.

E. Due to the COVID-19 Crisis, the City Must Adopt a Mandatory Finding of Significance that the Project May Cause a Substantial Adverse Effect on Human Beings and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.²

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from the Project’s construction activities. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

In particular, based upon SWRCC’s experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.

² Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody

gaining entry to the project site such as returning personnel, deliveries, and visitors.

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.³

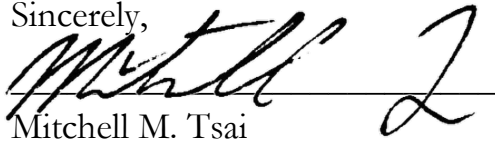
The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that

³ See also The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, available at https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitchell M. Tsai", is written over a horizontal line. The signature is stylized and cursive.

Mitchell M. Tsai

Attorneys for Southwest Regional
Council of Carpenters

Jessie Fan

From: Lin, Alan S@DOT <alan.lin@dot.ca.gov>
Sent: Wednesday, October 14, 2020 7:17 PM
To: Michael.Allen@culvercity.org
Subject: FW: SCH # 2020090329 11111 Jefferson Blvd Mixed-Use Project
Attachments: LA-2020-03371-Jefferson Mixed-Use Project-NOP.pdf

FYI

From: Lin, Alan S@DOT
Sent: Wednesday, October 14, 2020 6:59 PM
To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Cc: michale.allen@culvercity.org
Subject: SCH # 2020090329 11111 Jefferson Blvd Mixed-Use Project

Attached please see Caltrans' comment letter.

Thank you for the opportunity to review this project.

Alan Lin, P.E.
Transportation Engineer, Civil
IGR, Division of Planning
State of California
Department of Transportation
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
213-897-8391 Office
213-269-1124 Mobile

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-8391

FAX (213) 897-1337

TTY 711

www.dot.ca.gov



*Serious Drought.
Making Conservation
a California Way of Life.*

October 14, 2020

Mr. Michael Allen
City of Culver City
970 Culver Boulevard
Culver City, CA 90232

RE: 11111 Jefferson Blvd Mixed-Use Project
Vic. LA-405 PM 26.03, LA-90 PM T3.26
SCH # 2020090329
GTS # LA-2020-03371AL-NOP

Dear Mr. Allen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project would construct up to 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of up to 244,609 sf of residential area. The Project also includes 55,050 sf of ground floor retail area, up to 11,450 sf of second floor office uses and a total of 653 parking stalls.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

This development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

As a reminder, Vehicle Miles Traveled (VMT) will be the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. Agencies may opt-in prior to that date.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in July 2020.

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

Overall, the environmental report should include a Transportation Impact Study (TIS) to ensure all modes are well served by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03371AL-NOP.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: Scott Morgan, State Clearinghouse

Jessie Fan

From: mrsjones@earthlink.net
Sent: Thursday, October 15, 2020 10:03 PM
To: 11111Jefferson@3MRCapital.com; Michael.Allen@culvercity.org
Subject: 11111 Jefferson Project - comments

We are submitting our comments for the above project, based on the October 6 on-line presentation given by the project team. Our comments are in regards to aesthetics/environmental concerns and does not cover the EIR issues.

During the first part of the presentation, we were able to see several renderings of the project from different angles. The project will bring a nice improvement to the existing triangle space which now looks run-down. However we had a few concerns, mainly for aesthetics and architectural design currently proposed:

1. The open park spaces on the north and the south sides are a nice touch. However, the south seating/open space only has a few trees. Because this is "south", the public space may go under-utilized because people don't want to sit in a hot open sun. Umbrella will help but still the reflection from the ground will make the space very hot. We recommend adding more shade trees.
2. The project location (the triangle) is surrounded by houses, low buildings, and open parking space. The new 5 story building will be visually overpowering and will appear isolated from the surrounding. The revised design now incorporates open spaces on north and south, and the modified architectural façade all will help softening the 5-story structure. However:
 - a) The 5 story building façade along Sepulveda and Jefferson is still very imposing with very little setback from the street. We recommend additional setback to allow taller street trees that can reach 30 to 40 feet.
 - b) Columns visible in the southerly open space two-story high are out of scale and do not blend in with the surrounding buildings. We recommend planting large trees in the space to soften the look and providing additional needed shade for a comfortable seating.
3. The residential portion of the building (floors 3 to 5th) looks warm and balanced. The office/commercial portion of the building (first two floors) looks like a miniature shopping mall/department store. My personal vision/recommendation of the project is to create a 3-story residential apartments floating over a massing of forest/trees where stores and offices are enveloped inside the woods.

We would appreciate if the project team can revisit some of the aesthetics and design based on our comments above. Thank you very much for your time and coordination with the community.

Mie Jones
5332 Kalein Drive

Jessie Fan

From: Nathan Birnbaum <dnbirnbaum@mac.com>
Sent: Friday, October 16, 2020 8:57 AM
To: Allen, Michael
Cc: Jessie Fan; Jay Ziff; Claire Peeps
Subject: COMMENTS - 11111 Jefferson Blvd
Attachments: Birnbaum-Peeps Comment - 11111 Jefferson Blvd Mixed Use.docx

Hello Mr. Allen,

We have been able to view the video and would like to add our comments to the public response. We believe emailed comments are acceptable but please let us know ASAP if we need to mail them to you today instead. We've attached our comments as a Word doc but also included them in the body of this email. Sorry for the last minute!

Thanks so much for your direct communications with us. Hope you're staying very safe.

Best,

Nathan Birnbaum & Claire Peeps

11178 Rhoda Way

Culver City, CA 90230

310.313.0744

TO: Michael Allen, Planning Manager, City of Culver City

FROM: Nathan Birnbaum & Claire Peeps, 11178 Rhoda Way, Culver City

DATE: 16Oct20

RE: 11111 Jefferson Blvd Mixed Use EIR Scoping Meeting

Dear Mr. Allen,

Thank you for the excellent planning work your department does for Culver City residents. We have lived in the Lindberg Park neighborhood for 23 years. Our intention is to keep our property in the family for a long time.

We have several strong reactions to the proposed 11111 Jefferson Blvd Mixed Use project. We attended the developer's meeting last year at the Senior Center. Our reactions have changed little since then.

The Project is Currently Too Big and Too High

- We're concerned about the destruction of the Lindberg Park neighborhood by the encroachment of high density, high rise development. We are by no means anti-development – we want smart, well-planned development along our commercial corridors that enhances the City's greatest asset: its historic, quiet, neighborhoods. ON the other hand, too much density right on the boarder of Lindberg Park may harm the neighborhood.
- At its current size, this project has the potential to disrupt and transform Lindberg Park.
- Adding 230 dwellings on the boarder of the neighborhood is huge.
- As an example, the users of Lindberg Park itself could skyrocket.

Affordable Units – Not Nearly Enough

- There seems to be an overabundance of market rate units in Culver City. The issue of affordable housing is a significant concern. Not only do we think this project should be smaller – less than 200 dwellings –we'd ALSO like to see this (and every new housing project) provide a minimum or 25% affordable units, matching Santa Monica's benchmark. If this seems like a contradiction: we are willing to suffer some of the consequences of development IF we know that a project is helping the City meet important goals that have been set in a strong planning process.

11111 Jefferson Blvd Will Permanently Change Traffic in the Neighborhood

- The light on Sepulveda will greatly slow traffic on a heavily used arterial.
- Machado will be permanently transformed by heavy traffic.
- We want the City to ensure that traffic in Lindberg Park area won't be heavily impacted.
- Will the city provide dash service to DTCC to mitigate the increased difficulty of getting around?

-

The Open Space Component

- Useable, beautiful public space always provides significant mitigation. This project seems to have a good public space component – IF it's truly useful space. A small brick plaza with a few benches is not mitigating. Quiet areas, removed from the street, with gardens, water features, retreat quality, with possible cultural uses – these are the public space benefits that we think are really valuable.

Fit with City Plan

***How does this project fit with the City's plan for the future? We want the City to have a great plan for the future – and to stick to the plan!

On Oct 12, 2020, at 10:48 AM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning Mr. Birnbaum,

Just a quick follow up - I was able to upload the video via Youtube. Please select the first link in the project folder which will redirect you directly to the scoping meeting video.

<https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects/-folder-749>

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Allen, Michael <Michael.Allen@culvercity.org>

Sent: Friday, October 9, 2020 9:59 AM

To: dnbirnbaum@mac.com <dnbirnbaum@mac.com>

Cc: Jessie Fan <JFan@esassoc.com>; Jay Ziff <JZiff@esassoc.com>

Subject: Re: Reminder: 11111 Jefferson Boulevard Mixed-Use Project: Community Meeting and Scoping Meeting starts in 1 hour

Good morning Mr. Birnbaum,

We are still receiving comments until Oct. 16th on the subject project Initial Study.

All materials can be referenced here, including the power point presentation made as part of the Scoping Meeting, and Initial Study documents:

<https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects/-folder-749>

Additionally, we are working on uploading the recording of the Scoping Meeting to that same page. Please check back before the end of next week for the recording.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Nathan Birnbaum <dnbirnbaum@mac.com>

Sent: Tuesday, October 6, 2020 8:34 PM

To: Jessie Fan <JFan@esassoc.com>

Subject: Re: Reminder: 11111 Jefferson Boulevard Mixed-Use Project: Community Meeting and Scoping Meeting starts in 1 hour

Hi Jessie,

My evening schedule shifted and I missed tonight's meeting. Has it been recorded by any chance?

I believe comments are still being accepted for another week or two, correct?

Thanks so much,
Nathan

On Oct 6, 2020, at 5:02 PM, Jessie Fan <no-reply@zoom.us> wrote:

Hi Nathan Birnbaum,

This is a reminder that "11111 Jefferson Boulevard Mixed-Use Project: Community Meeting and Scoping Meeting" will begin in 1 hour on:
Date Time: Oct 6, 2020 06:00 PM Pacific Time
(US and Canada)

<Outlook-
Image
remo.png>

Join from a PC, Mac, iPad, iPhone or Android device:

[Click Here to Join](#)

Note: This link should not be shared with others; it is unique to you.

[Add to Calendar](#) [Add to Yahoo Calendar](#)

Or join by phone:

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+1 470 250 9358 or +1 646 518 9805 or +1
669 219 2599 or +1 206 337 9723

Webinar ID: 835 7553 2747

International numbers

available: <https://esassoc.zoom.us/j/83575532747>

Or an H.323/SIP room system:

H.323:

162.255.37.11 (US West)

162.255.36.11 (US East)

115.114.131.7 (India Mumbai)

115.114.115.7 (India Hyderabad)

213.19.144.110 (Amsterdam Netherlands)

213.244.140.110 (Germany)

103.122.166.55 (Australia)

149.137.40.110 (Singapore)

64.211.144.160 (Brazil)

69.174.57.160 (Canada)

207.226.132.110 (Japan)

Webinar ID: 835 7553 2747

SIP: 83575532747@zoomcrc.com

Or Skype for Business (Lync):

<https://esassoc.zoom.us/j/83575532747>

You can [cancel](#) your registration at any time.

<Outlook-Image remo.png>

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

MEMO

TO: Michael Allen, Planning Manager, City of Culver City

FROM: Nathan Birnbaum & Claire Peeps, 11178 Rhoda Way, Culver City

DATE: 16Oct20

RE: 11111 Jefferson Blvd Mixed Use EIR Scoping Meeting

Dear Mr. Allen,

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Fit with City Plan

***How does this project fit with the City's plan for the future? We want the City to have a great plan for the future – and to stick to the plan!

Many thanks,

Nathan Birnbaum & Claire Peeps
11178 Rhoda Way
Culver City, CA 90230
310.313.0744

Jessie Fan

From: melinda dickinson <secret45garden@hotmail.com>
Sent: Friday, October 16, 2020 5:11 PM
To: Michael.allen@culvercity.org
Cc: melinda dickinson
Subject: 11111 Project concerns

Michael.allen@culvercity.org

Michael Allen, Current Planning Manager
City of Culver City Current Planning Division

Mr. Allen,

#1. More people will be affected by this project than received notice of it. Because of the location of the main U.S. Post Office in Culver City, at 11111 Jefferson this fact is obvious. I believe it reflects the lack of desire for input opposed to this ill-placed development.

#2. This triangle area currently has enough traffic with Jefferson and Sepulveda flowing together their mixed use vehicles, heading for entrances to the 405 N & S, 90 E & W. To add 300-600 MORE parking spaces and thus GREATLY adding to the traffic is unconscionable.

#3. I object to the size and scope of this project for the above reasons as well as the impact on the neighborhoods adjacent. It is not difficult to picture cars cutting through the neighborhood streets when traffic backs up during the two years of construction as well as (hope not...) completion.

Sincerely,
Melinda Dickinson
45-year resident of CC

Jessie Fan

From: rturner@archaeopaleo.com
Sent: Friday, October 16, 2020 5:58 PM
To: 'Allen, Michael'
Subject: RE: 11111 Jefferson project IS comments

Thank you Michael.
Robin

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Friday, October 16, 2020 5:46 PM
To: rturner@archaeopaleo.com
Subject: Re: 11111 Jefferson project IS comments

Good afternoon Ms. Turner,

Thank you, I am in receipt of your below concerns/questions regarding the 11111 Jefferson Mixed Use Project. You have asked/raised several excellent questions that cannot be fully answered at this moment since the project is currently in the environmental evaluation stage.

Accordingly, I will forward to the environmental team, as well as the project developer/applicant for their review, and for inclusion to the full EIR as appropriate.

Thank you!

Best,

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

From: rturner@archaeopaleo.com <rturner@archaeopaleo.com>
Sent: Friday, October 16, 2020 1:39 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: RE: 11111 Jefferson project IS comments

Hi Michael,
My comments on the Initial Study for the 11111 Jefferson Blvd Project are stated below.

I would first like to comment on the timing of this Initial Study (IS) release and comment period during a pandemic that does not afford many of the older population and/or disabled community to have a fair shake in being part of this process. Many people do not have computer access or ability to use resources (such as with the community scoping

zoom meeting), or have access to the IS in paper form, in order to be able to voice their concerns. I have talked to many of them and they thought the project process was on hold. At the first proponent meeting at Temple Akiba prior to the pandemic, the crowd was so large that it was standing room only and most of the attendees were long-term residents (most lived in Culver City for over 40 years) that came to talk at that meeting. Being at that meeting was their only access in being able to voice their concerns. The IS determination during the pandemic in which many have their voices suppressed is criminal and I would ask that you postpone this IS determination until everyone interested can be part of this process.

Regarding the IS in general, there are many assumptions, omissions, and conflicts that need to be addressed. The first being on the page EC-3 under the "Environmental Factors Potentially Affected". The check box for Aesthetics has not been checked off. This is a huge issue since this evaluation needs to be conducted thoroughly and accurately. Throughout the IS (and especially on page B-1) it states that the area is "highly urbanized" and it only assessed for "scenic vistas", "damage scenic resources" (trees, rock outcroppings, and historic buildings within a state scenic highway), and while it does not consider the area to be a non-urbanized area, which is correct, the preparers did not do their due diligence in considering how the project would impact the surrounding areas buildings, since the proposed project will be three to four times taller than what is currently there. In other words, from the current one/two story buildings to a dense conglomeration of 5 story buildings. It also does not consider the severe visual impact the project will cause regarding public views to the adjacent buildings and the area as a whole. The IS states that there will be no to low impact to aesthetics since it is a urbanized area. This is false. All of the buildings directly adjacent to the project are one and two story buildings nestled in long-standing established residential communities and low-impact businesses. This project will also physically divide this established community.

The final comment that I have on the IS, is the blatant disregard in the Measure 1 Height Initiative ballot measure that was approved overwhelmingly by the voters in 1988. The voter mandate will not allow buildings to be built over 56 feet in height. The proposed project is 67 feet in height, which is a violation of the height restriction law. There is NO variance that is allowed under this law to exceed the 56 feet. The IS should have discussed this issue within the document. The city staff should have explained this to the project proponent as well as the IS preparers. I am deeply concerned that because the staff is allowing this height variation, that the city is planning to allow the same type of project to occur at the Studio Village property west of this current project (where Pavilions is currently located) so this project will set a precedent for larger future developments and further divide the small town feel of Culver City.

Thank you,
Robin Turner

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Wednesday, October 14, 2020 2:36 PM
To: rturner@archaeopaleo.com
Subject: Re: 11111 Jefferson project IS comments

Good afternoon,

By email is perfectly okay (and most efficient).

It can be send directly to me, and I will package with others that I have received and forward to the environmental team.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: rturner@archaeopaleo.com <rturner@archaeopaleo.com>

Sent: Wednesday, October 14, 2020 2:34 PM

To: Allen, Michael <Michael.Allen@culvercity.org>

Subject: 11111 Jefferson project IS comments

Hi Michael,

Can we submit our 11111 Jefferson project IS comments by email or is there another way you want them for the record?

Thank you,

Robin Turner

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Jessie Fan

From: Marcy Miller <marcy.beth.miller@gmail.com>
Sent: Monday, October 19, 2020 7:59 PM
To: Allen, Michael
Subject: Re: 11111 Jefferson Triangle Project

Thanks so much! I really appreciate it!

On Mon, Oct 19, 2020 at 5:32 PM Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good evening,

Just a brief follow up, my apologies, I realized that today was the cut off time for receipt of comments (which explains why I received so many!).

Nonetheless, please be assured your below comments are being forwarded to the environmental team accordingly.

Best,

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

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Monday, October 19, 2020 8:00 AM
To: Marcy Miller <marcy.beth.miller@gmail.com>
Subject: Re: 11111 Jefferson Triangle Project

Good morning Ms. Miller,

I am in receipt of the below, thank you for sending your questions/concerns regarding the 11111 Jefferson Blvd. Mixed Use Project. The comment period for the Notice of Preparation closed as of 5:30 pm on Oct. 16. However, I will still be forwarding the below to the project team, and environmental consultants for consideration as part of the ongoing project review.

Best,

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

From: Marcy Miller <marcy.beth.miller@gmail.com>
Sent: Saturday, October 17, 2020 10:51 AM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: 11111 Jefferson Triangle Project

Hi Michael,

I'm a resident of the Heritage Park neighborhood. Overall, it is nice to see some revitalization and modernization of consumer spaces in Culver City and I look forward to having eateries and retail space in walking distance and nice outside areas for my family and I to relax in with this project. I also hope that there is a shuttle that would connect this development to downtown culver city and the metro line so increase use of public transportation.

However, my husband and I (and I believe my community at large) are very concerned about the additional amount of traffic and cars that will be coming to an already congested area. Primary areas of concern are:

1. The proposed entrance for all the residential parking is on Machado Rd directly across from the entrance to Heritage park (via Heritage Place). Currently, Heritage Park residents can only turn right onto Machado but the new proposal will allow cars to turn left on Machado or drive directly across the street into the resident parking entrance of the new development. We are VERY concerned that this will lead to cut through traffic in our quiet neighborhood with narrow streets where cars will turn down Ballona Lane to cut through to Machado rather than make a right directly from Jefferson on Machado. We have many young children in our neighborhood and it is an extreme SAFETY concern to have additional cars driving through. We would want the city to have the plans and the funds ready to protect our neighborhood from cut through traffic.
2. There is already heavy congestion going Southbound on Sepulveda especially in the late afternoon/evening time. Because of the way the median exists on the street, cars are unable to enter the left turn lane (to make the left from Sepulveda onto Machado) until almost the light signal. This causes a significant delay in waiting to turn left on Machado of sometimes several light cycles. Given the short distance on Machado from Sepulveda to the proposed residential entrance, I'm concerned about the backup on Machado and trickling down to both northbound and southbound Sepulveda for cars trying to get on Machado.
3. Machado is not a large road and adding two entries into the complex on Machado could cause traffic delays and an increase in traffic collisions. Because the road is short, there will be a lot of cars needed to turn quickly once on Machado.
4. Currently, Kayne Eras has bus and overflow parking on part of project land. I know the developers are working on solutions for the overflow parking, but it is important that this also include a place and plan for the buses to park overnight and start in the morning.

Thank you for your time.
Marcy Miller

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Jessie Fan

From: Gillian Nelson <glresident@hotmail.com>
Sent: Monday, October 19, 2020 5:47 PM
To: Allen, Michael
Subject: Re: Jefferson Triangle EIR

Thank you!

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Monday, October 19, 2020 8:32 PM
To: Gillian Nelson <glresident@hotmail.com>
Subject: Re: Jefferson Triangle EIR

Good evening,

Just a brief follow up, my apologies, I realized that today was the cut off time for receipt of comments (which explains why I received so many!).

Nonetheless, please be assured your below comments are being forwarded to the environmental team accordingly.

Best,

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

From: Allen, Michael <Michael.Allen@culvercity.org>
Sent: Monday, October 19, 2020 8:34 AM
To: Gillian Nelson <glresident@hotmail.com>
Subject: Re: Jefferson Triangle EIR

Good morning Ms. Nelson,

I am in receipt of the below, thank you for sending your questions/concerns regarding the 11111 Jefferson Blvd. Mixed Use Project. The comment period for the Notice of Preparation closed as of 5:30 pm on Oct. 16. However, I will still be forwarding the below to the project team, and environmental consultants for consideration as part of the ongoing project review.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Ph: 310.253.5727

From: Gillian Nelson <glresident@hotmail.com>
Sent: Sunday, October 18, 2020 4:47 PM
To: Allen, Michael <Michael.Allen@culvercity.org>
Subject: Jefferson Triangle EIR

To: The Culver City Planners and Developers of the Jefferson Triangle,

First of all, replacing the post office and Coco's will have a negative impact on the environment by removing two essential services that are used on a regular basis by me and many of my elderly neighbors who walk for these services.

Second, replacing these essential services with retail/residential development, such as the Jefferson Triangle will bring more air and noise pollution to Culver City, increasing the health risk of individuals like myself who have allergies and respiratory sensitivities. The extra traffic alone, would increase commute times to work and other places, which is another added stress that effects health.

Third, since the rents will likely be higher, other small businesses will suffer or close, which will further compound the effects of the pandemic, which currently has no end in sight.

Thank you for forwarding this to the developers.

Gillian Nelson, resident of Culver City for over 20 years

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Jessie Fan

From: Marla Rothfarb <marlawynne@yahoo.com>
Sent: Monday, October 19, 2020 8:50 AM
To: Michael.Allen@culvercity.org
Subject: 11111 Jefferson Blvd - Public Comment

Attention:
Michael Allen, Current Planning Manager
City of Culver City Current Planning Division
9770 Culver Boulevard, Culver City, CA 90232

Mr. Allen, I am a resident at Studio Village Townhomes, located at 5215 Sepulveda Blvd #27F, Culver City, CA 90230. I am very concerned about the scope of the project at 11111 Jefferson Blvd.

I would like to see a further reduction in the number of apartments scheduled to be built. The traffic in the area is already really bad - most people say from 4P-6P, but I travel around 7-730P, and Jefferson/Sepulveda towards the Fox Hills Mall was extremely heavy at that hour. It truly concerns me that the development team picked 1 (ONE) day to do a traffic assessment. This is unacceptable. Granted, with Covid19, traffic is lighter than it's been in years, so another assessment done now/near future will not provide a true picture. However, a few hours of one day of watching traffic patterns in the area is not valid..

With so many new apartments, brings on average 2 cars per apartment - not sure if that is a fair assumption. Even if 1 car per apartment, plus the visitors to the businesses throughout the day, our corridor will be a traffic nightmare. Turning onto Machado Road (from the east part of Jefferson) is already crowded - add a huge complex with more cars than space, will further back up traffic.

As the project stands now, road peace will be non existent. The project needs to be further reduced in size and scope.

Respectfully,

Marla Rothfarb
5215 Sepulveda Blvd #27F
Culver City, CA 90230
marlawynne@yahoo.com
Cell: 213-509-1190

Jessie Fan

From: Vicki Daly Redholtz <vicki-dr@ca.rr.com>
Sent: Monday, October 19, 2020 6:23 PM
To: Allen, Michael
Cc: Blumenfeld, Sol; Nachbar, John
Subject: Re: 11111 Jefferson

Thank you! Yes I was confused about the date too

The answer about Machado doesn't really address my concerns as to whose idea it was in the first place to even think about narrowing Machado, but I'll let that go at this point since the public was listened to and no one wants to fess up -☺

Take care, and thanks for your work

Vicki

Sent from my iPhone

On Oct 19, 2020, at 5:35 PM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good evening,

Just a brief follow up, my apologies, I realized that today was the cut off time for receipt of comments (which explains why I received so many!). Nonetheless, please be assured your below comments are being forwarded to the environmental team accordingly.

As it relates to the more specific question below, there were several configurations of Machado Rd. that the City asked to be explored and analyzed only, ranging from a reduced lane scenario to no change at all, with various combinations of the between.

Best,

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

From: Vicki Daly Redholtz <vicki-dr@ca.rr.com>
Sent: Monday, October 19, 2020 12:13 PM
To: Allen, Michael <Michael.Allen@culvercity.org>

Cc: Blumenfeld, Sol <sol.blumenfeld@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>

Subject: Re: 11111 Jefferson

Hi and thanks - I did not receive that letter and I'm already signed up for planning commission notices but I'll double check that

Please answer my question about Machado and whether it was the City or the developers who first wanted that street narrowed and who want it to be the only exit and entrance for apartments- per the developers, the City wanted it narrowed but that would be horrific for us. Is it the City or the developers?

Thank you

Vicki

Sent from my iPhone

On Oct 19, 2020, at 12:03 PM, Allen, Michael <Michael.Allen@culvercity.org> wrote:

Good morning,

I apologize, I don't seem to have any emails from you previously, in my inbox or my spam/junk folders.

The deadline to submit comments on the environmental Notice of Preparation was on Friday, October 16. However, I will certainly forward your below concerns to the environmental team to be incorporated into the Environmental Impact Report. This was noticed via USPS on 9/17 to 5215 Sepulveda Blvd. Unit #14A, along with the City's GovDelivery email notification, and posted to the [Public Notice's](#) page on the City's website. In addition to the USPS mailing and posting, you can ensure email notification by registering/updating your preferences to include the Planning Commission notifications at <https://public.govdelivery.com/accounts/CACULVER/subscriber/session/new>.

During the project teams/developers ongoing design of the project, City staff has requested they consider and study several different site designs and configurations, including variable combinations of access, road configurations, and site layout. In order to further understand potential community benefits related to impacts of the project as you have identified, environmental impacts will be identified during and through the development of the Environmental Impact Report (EIR), which as of 10/16 with the close of the public comment for the Initial Study/Notice of Preparation, is currently underway. The remaining EIR work is expected to take 3 months, and will be recirculated and published for public comment once complete, which is anticipated to be approximately January 2021.

I you have any additional questions, or any feedback once the EIR is published, please feel free to follow up with me.

Best,

Michael Allen

Planning Manager

City of Culver City, Current Planning Division

9770 Culver Boulevard

Culver City, CA 90232

Ph: 310.253.5727

From: Vicki Daly Redholtz <vicki-dr@ca.rr.com>

Sent: Monday, October 19, 2020 11:33 AM

To: Allen, Michael <Michael.Allen@culvercity.org>

Cc: Blumenfeld, Sol <sol.blumenfeld@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>

Subject: 11111 Jefferson

Hello Michael:

I wrote to you last month and never got an answer. What is the timeline for the EIR for this project? I am very concerned about the impact on Studio Village, especially with cut-through traffic, the current inability to leave our complex on many occasions, and the drain on Machado.

We were told by the developers that the City is the one who wanted to first narrow Machado, and finally leave it as the only ingress and egress for the apartments. Is that true? What community benefits can Studio Village get in order to offset the problems of traffic and parking that will obviously be created by this project.

Also, I heard by accident that today was the last day to comment on this. I don't understand that I found out through a neighbor when I am signed up for any type of notification for development projects for the City. I have asked others, and they never knew today was some kind of deadline, and I'm not even sure what it's the deadline for. I'm also not sure why I never received a response to my previous email to you directly.

Please be sure I am notified of anything to do with this project, and respond to my questions as soon as possible.

Thank you,

Vicki

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Jessie Fan

From: ovibose gmail <ovibose@gmail.com>
Sent: Monday, October 19, 2020 4:56 PM
To: Michael.Allen@culvercity.org
Subject: 11111 Jefferson project

To:
Mr Michael Allen, Current Planning Manager
City of Culver City Current Planning Division

We live in the Sunkist Park neighborhood, and strongly believe that the proposed oversized development will have numerous negative environmental effects on the neighborhood and surrounding areas. There will be a noticeable increase in traffic and congestion, in an already badly congested area - the traffic on this section of Sepulveda and Jefferson Blvd's is already quite bad. There will be increases in greenhouse gas emissions and pollution, as well as noise pollution. The air quality will deteriorate further. The increase in population density will certainly negatively impact the area, which is now and has traditionally been primarily a fairly low density area.

We support the sort of development that would not radically increase the size and square footage of the buildings on the property, and would not increase the population density. In addition, we would hate to see the local post office go. We realize that the developer wants to maximize their profits, and the city likely wants to maximize potential tax revenue, but this should not be done at the expense of the residents and tax payers of the area.

Thank you for your consideration,
Donald White and Lisa Chang
11156 Woolford St.
Culver City 90230

Jessie Fan

From: Susan Markman <susan.mark@icloud.com>
Sent: Monday, October 19, 2020 5:04 PM
To: Michael.allen@culvercity.org
Subject: Jefferson Blvd mixed use Project

I live at RAINTREE Townhomes and am pretty stressed about the upcoming tear down the property at Jefferson and Machado Road off Sepulveda Blvd. Firstly we already are congested with after 4pm traffic from the Target, Pavillions shopping centers across the street. We already have Ralph's, Target, Pavilion and Sprouts. Why on earth would you build and lease another market. Machado is becoming high trafficked now and we're in a pandemic. It will be 10X worse with this new plan of new stores and a SUPERMARKET. Your parking will be horrendous. I'm already experiencing constant construction and major traffic. This project will make getting around very difficult and unbearable.

Please at least reconsider the building of a MARKET. WE DEFINITELY DO NOT NEED ANOTHER ONE to create only more of a mob scene.
Susan Markman
Raintree Condominiums

Sent from my iPhone

From: Mary Daval <marydaval@yahoo.com>
Sent: Tuesday, October 20, 2020 5:04 PM
To: Michael.Allen@culvercity.org
Cc: michelle weiner; Patricia Bijvoet; Disa Lindgren
Subject: Mixed Use Development 11111 Jefferson Blvd, CC

Dear Mr Allen:

I would like to share with you some reactions I have to the posted plans for the Mixed Use Development at 11111 Jefferson Blvd.

I did not realise that today was the deadline and I apologise that I am writing this email with some haste!

I will admit that I am a bit befuddled by the instruction that my comments should indicate items that I feel should be included in the EIR. I'm not sure that I am qualified to make that assessment, however, I do feel qualified to have many, varied reactions to this project. I am going to let you decide if they rise to the level of EIR status. If they don't, I will continue to raise these observations at other forums.

I will try to be brief:

1. Culver City is known for its innovative architecture and for its architecture as art programs. We need something in this part of the city with an award winning design.
2. There is way too much parking which will result in way too much traffic and air pollution. Please count parking in the overall area (lots of parking across the street). Parking is too expensive to build. All parking should be underground in order to increase curb appeal, accessibility to interior open space, and accessibility to ground level retail

3. How much office space is actually needed? After this pandemic more people will be working from home and CC already has lots of office space. How much of it will remain empty after Covid?

4. More housing, especially affordable housing

5. Please design for calm and quiet in the courtyard, no cars should be entering the interior courtyard—not attractive and not safe!

6. No big box tenant!! Really? This is sooo 20th century. People want to support small businesses! And, take a look across the street where several big box stores are empty!

7. In short, I'd like to see something that is green. LEED award winning as well as design award winning (see #1 above) Why is all the architecture as art in the Hayden tract? Let's spread it around!

8. Let's try for a zero waste building

Thanks for considering my thoughts!

Mary Daval

Comments submitted in the Q&A during the EIR Scoping Meeting

Name and Email	Question
Bonnie Wacker bonwack1@yahoo.com	The initial traffic study i believe was done during summer break or Easter break when school was not in session. This would affect its validity.
Hank Fawcett hankfawcett@yahoo.com	The study segments did not include Overland Blvd driving east from Jefferson Blvd. The construction will definitely increase traffic density along Overland going toward the freeway. How will this be handled?
James Harris Jtharris5@ca.rr.com	On your "level of study" map, you are studying the impact on Sunkist Park and Heritage Park, but not Studio Village Townhomes. With the increased traffic on Sepulveda & Machado, we are in danger of being gridlocked at our Machado Road entrance. will you commit to studying the intersection of Machado and Sepulveda, particularly on entrance/exit from Studio Village to Machado?
Katie Chou katiefchou@gmail.com	For comments already sent to Mr. Allen, do we need to send them in again now?
Sarah Goldman sarahmgoldman@hotmail.com	What is the plan for protecting Heritage Park and it's quiet streets?
Wandy Sae-Tan Heritagepark.wandy@gmail.com	<p>The initial study, on page 23, is showing the Machado median being modified to allow westbound traffic to turn left into the two entrances (residential and retail) of the complex. The modified median also appears to allow vehicle traffic to exit Heritage Place and cut across Machado to enter 11111.</p> <p>We cannot have people using Heritage Park as a cut-through. The community roads inside Heritage Park are narrower than standard streets, with sidewalks only on one side.</p> <p>Cut-through traffic would (i) be dangerous for the pedestrians and kids in the community, and (ii) unfairly increases the road maintenance and repair cost, which are paid for by Heritage Park.</p> <p>What are the city's plans to prevent cut-through traffic from using Heritage Place community roads to access the 11111 complex? (such as, reconfiguring the layout of the residential entrance location and the Machado traffic median, a gate installation, or other solutions)</p>
Bernard Bronstein Bronstein84@verizon.net	Flashing red light at Sawtelle/Hayter was originally a stop-gap measure to slow Sawtelle traffic while seeking funding to install sensed light designed to turn red when a vehicle approached above speed limit (or if pedestrian pushed button to cross). Will that option be reviewed?
Michelle Weiner Michmobile2011@gmail.com	Will the amount of parking be evaluated for the impact it has on increasing traffic? This development is on Sepulveda, very close to a transit hub. Please look at how this out-of-date parking plan encourages more traffic.