

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



Reply all Delete Junk Block ...

Crossing Campus DRAFT

DJ Diaz, Jose@DTSC <Jose.Diaz@dtsc.ca.gov>
Wed 7/27/2022 8:32 AM
To: Anderson, Jeff



Mr. Anderson,

According to the Initial Study, soil vapor, indoor air, and groundwater sampling investigation was conducted on the Project Site that included the collection and analysis of 16 subsurface soil vapor samples, three groundwater samples, and 12 indoor air samples, and five outdoor air samples at various locations. Soil vapor sampling results were compared to Department of Toxic Substances Control (DTSC) and USEPA vapor intrusion screening levels for commercial land use. Perchloroethene (PCE; also referred to as tetrachloroethene) was detected in sub-slab soil vapor in the northern portion of the Project Site at concentrations above its screening level for commercial land use. Several other volatile organic compounds (VOCs) were also detected but at concentrations below their screening levels for commercial land use. Follow-up indoor air sampling conducted within the Venice Boulevard buildings did not identify PCE or other VOCs at concentrations above their respective screening levels.

1-1

The full nature and extent of PCE contamination should be investigated and a human health risk should be performed to determine if those detections would pose a risk to human health in an unrestricted land use scenario. If the property or portions of the property do not meet the unrestricted land use scenario institutional controls such a land use restrictions or mitigation measures should be implemented to protect future occupants of the property.

1-2

The Department of Toxic Substances Control (DTSC) oversees the investigation and cleanup of properties contaminated with hazardous substances and/or wastes. DTSC has professional staff that works on site characterization and cleanup activities and provides guidance through its Site Mitigation & Restoration Program (SMRP). The SMRP enables parties to assess and remediate contaminated properties in a cost-effective cooperative manner.

1-3

Additional information on the Voluntary Agreements can be found on our website using the following link. Thank you for your attention to this matter.

- https://dtsc.ca.gov/
https://dtsc.ca.gov/brownfields/voluntary-agreements-quick-reference-guide/
https://dtsc.fluxx.io/user\_sessions/new

Jose F. Diaz
Regional Voluntary Agreements & Brownfields Coordinator
Site Mitigation & Restoration Program
Southern California Division -Chatsworth Office
818.717.6614 office
818.968.1885 mobile
Jose.Diaz@dtsc.ca.gov

Department of Toxic Substances Control
9211 Oakdale Avenue, Chatsworth, California 91311
California Environmental Protection Agency

Reply all Delete Junk Block ...

Re: 8833 National Blvd (Formerly 8825 National Blvd)

Some content in this message has been blocked because the sender isn't in your Safe senders list. I trust content from admin@gabrielenoindians.org. | Show blocked content

You forwarded this message on Thu 7/28/2022 1:56 PM

GA Gabrieleno Administration <admin@gabrielenoindians.org>
To: Anderson, Jeff
Cc: Matt Teutimez.Kizh Gabrieleno <matt.teutimez@gmail.com>

Icons for actions: print, thumbs up, reply, reply all, forward, more options. Date: Wed 7/27/2022 12:48 PM

Thank you Mr. Anderson for the great relationship, understanding and respect . We agree to the mitigations your provided July 7, this can conclude consultation.

2-1

On Wed, Jul 27, 2022 at 10:13 AM Anderson, Jeff <Jeff.Anderson@culvercity.org> wrote:

Brandy,

This information was delivered after the Draft EIR was completed. It will be included as a comment for the Final EIR.

Thank you.

Jeff

From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Tuesday, July 19, 2022 3:04 PM
To: Anderson, Jeff <Jeff.Anderson@culvercity.org>
Subject: Re: 8833 National Blvd (Formerly 8825 National Blvd)

Hello Jeff

Please see the attached revised changes to the mitigations.

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCETTI  
MAYOR

BOARD OF PUBLIC WORKS  
MEMBERS

AURA GARCIA  
PRESIDENT

M. TERESA VILLEGAS  
VICE PRESIDENT

DR. MICHAEL R. DAVIS  
PRESIDENT PRO TEMPORE

VACANT  
COMMISSIONER

VAHID KHORSAND  
COMMISSIONER

DR. FERNANDO CAMPOS  
EXECUTIVE DIRECTOR

BUREAU OF SANITATION

BARBARA ROMERO  
DIRECTOR AND GENERAL MANAGER

TRACI J. MINAMIDE  
CHIEF OPERATING OFFICER

VACANT  
CHIEF FINANCIAL OFFICER

JULIE ALLEN  
NICOLE BERNSON  
MAS DOJIRI  
JOSE P. GARCIA  
ALEXANDER E. HELOU  
ASSISTANT DIRECTORS

TIMEYIN DAFETA  
HYPERION EXECUTIVE PLANT MANAGER

WASTEWATER ENGINEERING  
SERVICES DIVISION  
2714 MEDIA CENTER DRIVE  
LOS ANGELES, CA 90065  
FAX: (323) 342-6210  
WWW.LACITYSAN.ORG

August 2, 2022

Jeff Anderson, Contract Planner  
City of Culver City Current Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232-0507

Dear Mr. Anderson,

**SUBJECT: CROSSING CAMPUS - NOTICE OF COMPLETION AND AVAILABILITY OF  
DRAFT ENVIRONMENTAL IMPACT REPORT AND PUBLIC MEETING**

This is in response to your July 21, 2022 Notice of Completion and Availability of Draft Environmental Impact Report and Public Meeting for the proposed office building, auto parking and two sewage ejectors project located at 8833, 8825 National Boulevard and 8771 Washington in Culver City, CA 90232; and 8876, 8884, 8886 and 8888 Venice Blvd and 8827, 8829 National Blvd, Los Angeles, CA 90232. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is in the final stages of the California Environmental Quality Act review process and requires no additional hydraulic analysis. Please notify our office in the instance additional environmental review is necessary for this project.

3-1  
↓

*zero waste • zero wasted water*

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

## Comment Letter No. 3

Crossings Campus - NOC & NOA of dEIR & Public Meeting  
August 2, 2022  
Page 2 of 2

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

↑ 3-1  
| (cont.)  
↓

Sincerely,



Rowena Lau, Division Manager  
Wastewater Engineering Services Division  
LA Sanitation and Environment

RL/CD: sa

c: Julie Allen, LASAN  
Michael Scaduto, LASAN  
Christine Sotelo, LASAN  
Christopher DeMonbrun, LASAN



BUILDING A STRONGER L.A.

Eric Garcetti, Mayor

Board of Commissioners  
Cynthia McClain-Hill, President  
Cynthia M. Ruiz, Vice President  
Jill Banks Barad-Hopkins  
Mia Lehrer  
Nicole Neeman Brady  
Chante L. Mitchell, Secretary

Martin L. Adams, General Manager and Chief Engineer

August 29, 2022

Mr. Jeff Anderson, Contract Planner  
City of Culver City Current Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232

Dear Mr. Anderson:

Subject: Crossings Campus Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Crossings Campus Project (Project) located at 8833 and 8825 National Boulevard and 8771 Washington in Culver City, CA 90232; and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, CA 90232. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. Based on our review of the Draft Environmental Impact Report (EIR) prepared for the Project, we respectfully submit the comments below:

4-1

**Comments:**

**Joint System:**

- 1. This response shall not be construed as an approval for any project.

4-2

**Water System:**

**Chapter 5 Alternatives**

- 1. The Santa Monica Basin (SMB), a medium-priority basin designated by the California Department of Water Resources and managed by the Santa Monica Basin Groundwater Sustainability Agency (SMBGSA), underlies the project site. Based on our review of the draft EIR, it is our understanding that the project's alternatives propose construction methodologies that would extend excavations below the depth to groundwater (historical high and levels encountered during site exploration), necessitating the use of a dewatering system, potentially affecting the SMB's groundwater resources. We recommend that the Project be submitted to the

4-3

Mr. Anderson  
Page 2  
August 29, 2022

SMBGSA for verification of conformity with the rules and regulations, particularly those pertaining to groundwater extractions. More information about the SMBGSA is available by calling (310) 458-8231 or visiting <https://www.santamonica.gov/gsp>.

↑ 4-3  
(cont.)

For any questions regarding the above comments, please contact Ms. Jazmin Martin of my staff at (213) 367-1768 or [Jazmin.Martin@ladwp.com](mailto:Jazmin.Martin@ladwp.com).

↑ 4-4

Sincerely,

**Nadia Parker** Digitally signed by Nadia Parker  
Date: 2022.09.02 07:55:23 -07'00'

Charles C. Holloway  
Manager of Environmental Planning and Assessment

JM:lr  
c: Ms. Jazmin Martin



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 269-1124  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

September 1, 2022

Jeff Anderson, Contract Planner  
City of Culver City  
Current Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232

RE: Crossings Campus  
SCH # 2021110079  
Vic. LA-10 R7.65  
GTS # LA-2021-04008-DEIR

Dear Jeff Anderson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project Site is currently improved with low-rise warehouses that have been converted into retail and office uses as well as surface and enclosed parking lots serving the existing uses on the Project Site. The Project would demolish the existing buildings on the Project Site and construct two four- to five-story buildings that would provide a total of 536,000 square feet (sf) of new office floor area, which is intended to be occupied by Apple Inc. The Project would provide a total of 1,216 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 175 bicycle parking spaces. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, a publicly accessible, privately maintained amenity area along Washington Boulevard in a small park-like setting, as well as an internal courtyard for the use of employees and occasional private tenant events.

5-1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor’s Office of Planning and Research (OPR) for more information:

5-2

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

↑ 5-3  
| (cont.)

The project features, location, and design would be consistent with both City’s plans, programs, ordinances, and policies that support alternative transportation and have been adopted to protect the environment. Therefore, the project would have a less than significant impact on both City’s transportation-related plans, programs, ordinances, and policies.

The project is not projected to substantially increase hazards, conflicts, or preclude City action to fulfill or implement projects associated with surrounding transportation networks and will contribute to overall walkability through enhancements to the project site and streetscape. Therefore, the project is expected to have a less than significant impact.

5-3

The project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT as it is located less than 600 feet from the Metro E Line Culver City Station, well within the ½ mile from a key Transit Priority Area as identified in Threshold 2, Transportation Study Criteria and Guidelines (TSCG). Therefore, a less than significant impact is presumed. However, the Project proposes voluntary TDM measures which would reduce project traffic.

The following voluntary TDM measures will be implemented to reduce vehicle trips generated by the project. The project will offer a wide variety of options to support employees choose to use a commute alternative to reach their destination. These programs are designed to make non-auto commutes attractive and viable options by providing employees with mobility once they arrive at work, access to needed services during the day, or financial incentives to participate.

1. TDM Support Services,
2. Marketing and Communications,
3. Public Transit,
4. Rideshare,
5. Bicycling,
6. Walking,
7. Pre-tax Commuter Benefit,
8. Commuter Club,
9. Commute Expert Program,
10. Guaranteed Ride Home Program,
11. Intercampus Shuttles,
12. Campus Bike Share Program, and
13. On-site Services.

5-4

Jeff Anderson  
September 1, 2022  
Page 3 of 3

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 voluntary 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:

5-5

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

On page 81 of the Transportation Impact Study, “The addition of Project traffic under all three analysis scenarios is not projected to cause or add to a queue extending onto the freeway mainline by less than two car lengths. Therefore, the Project is expected to cause a less than significant safety impact.” As a reminder, existing signal timing should use the actual signal timing for the queuing analysis to produce accurate analysis.

5-6

Any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.

5-7

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-04008-DEIR.

-8

Sincerely,

MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse



T 510.836.4200  
F 510.836.4205

1939 Harrison Street, Ste. 150  
Oakland, CA 94612

www.lozeaudrury.com  
Adam@lozeaudrury.com

Via Email

September 2, 2022

Jeff Anderson, Planning Manager  
Current Planning Division  
City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232  
[jeff.anderson@culvercity.org](mailto:jeff.anderson@culvercity.org)

**Re: Comment on Draft Environmental Impact Report, Crossings Campus Project  
(Case No. P2022-0144-CP/ZCMA, P2021-0272-EIR)**

Dear Mr. Anderson:

I am writing on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for the project known as Crossings Campus (Case No. P2022-0144-CP/ZCMA, P2021-0272-EIR), including all actions related or referring to the construction of two four- to five-story buildings that would provide a total of 536,000 square feet of new office floor area and a total of 1,216 vehicular parking spaces within two three-level subterranean garages under each proposed building, located at 8833 and 8825 National Boulevard and 8771 Washington Boulevard in the City of Culver City, and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in the City of Los Angeles (“Project”).

6-1

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. SAFER requests that the Planning Division address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

6-2

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

-3

Sincerely,

Adam Frankel  
LOZEAU | DRURY LLP

**GREGORY GORMAN**

Gorman Partners, LLC

(310) 770-3291  
[DrGGGorman@gmail.com](mailto:DrGGGorman@gmail.com)  
<https://www.linkedin.com/in/gregoryggorman/>  
[GormanPartnersllc.com](http://GormanPartnersllc.com)  
 5610 South Garth Ave  
 Los Angeles, CA 90056

**Via Delivery and Email**

Jeff Anderson, Contract Interim Current Planning Manager  
City of Culver City Current Planning Division, 2nd floor  
9770 Culver Boulevard, Culver City, CA 90232 Phone: (310) 253-5727 E-mail:  
[jeff.anderson@culvercity.org](mailto:jeff.anderson@culvercity.org)

PROJECT TITLE: Crossings Campus  
APPLICANT/OWNER: Culver Crossings Properties, LLC  
PROJECT ADDRESS: 8825 National Boulevard and 8771 Washington in Culver City, California,  
90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and  
8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel)

Dear Mr. Anderson:

This letter is written on behalf of an association of concerned individuals sometimes referred to as the Arts District Residents Association of Culver City (“Residents Association”). These associations are comprised of members of the Culver City community who are concerned about the above-referenced Project.

We have reviewed the Draft EIR and are in agreement with the proposed location of a traffic signal and entrance on Venice Boulevard. We also acknowledge that another workable solution would be to move the entrance approximately 50 yards further west.

We are excited about the Project and look forward to making sure that its impact on Culver City is as positive as possible.

Very Truly Yours,

Gregory G. Gorman, Esq.

Cc: Arts District Residents Association

7-1

300 Corporate Pointe, Suite 470, Culver City, CA 90230  
T: (310) 473-6508 | www.koacorp.com  
MONTEREY PARK ORANGE ONTARIO SAN DIEGO LA QUINTA CULVER CITY



## TECHNICAL MEMORANDUM

Date: September 6, 2022  
To: Jeff Anderson, Contract Planner – City of Culver City  
From: Ryan Kelly, TE – KOA Corporation  
Subject: Crossings Campus Project Draft EIR – Transportation Impact Study Comments

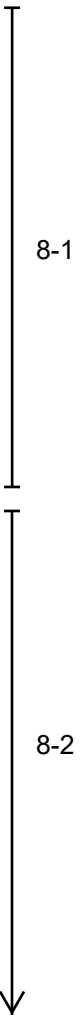
KOA Corporation has performed a cursory review of the Crossings Campus office development (the "Project") proposed by Culver Crossings Properties, LLC, and intended to be occupied by Apple Inc. at the following addresses in the Cities of Culver City and Los Angeles:

- 8825 National Boulevard in Culver City
- 8771 Washington Boulevard in Culver City
- 8876, 8884, 8886, and 8888 Venice Boulevard in Los Angeles
- 8827 and 8829 National Boulevard in Los Angeles

The City of Culver City, as Lead Agency, has prepared a Draft Environmental Impact Report (EIR) for the Project pursuant to the requirements of the California Environmental Quality Act (CEQA). The City of Culver City is in the process of collecting comments during the Draft EIR public review period from July 21, 2022 to September 6, 2022. As part of our review, we have the following comments on the Transportation Impact Study (TIS) prepared for the Project by Fehr & Peers in July 2022 and included as Appendix M to the Draft EIR.

### PROJECT TRAFFIC

In order to develop the weekday peak-hour vehicle trip estimates for the proposed Project land use, the General Office Building land use code was utilized from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). The ITE manual describes a General Office Building as "a location where affairs of businesses, commercial or industrial organizations, or professional persons or firms are conducted. An office building houses multiple tenants that can include, as examples, professional services, insurance companies, investment brokers, a banking institution, a restaurant, or other service retailers." Given that the Project would house a single tenant, it would not be considered a General Office Building housing multiple tenants. The Project would be a single-tenant office building, with Apple Inc. utilizing 100 percent of the 536,000 square feet of office floor area. Therefore, the more appropriate ITE land use code to use for vehicle trip estimation is Single Tenant Office Building, which ITE defines as an office building that "generally contains offices, meeting rooms, and space for file storage and data processing of a single business or company and possibly other service functions including a restaurant or cafeteria." A comparison of the vehicle trip generation rates between the General Office Building and Single Tenant Office Building land use codes shows that single-tenant office buildings generate vehicle trips at higher rates than general





office buildings, whether based on office floor area or number of employees, during both the weekday AM and PM peak hours. The use of the General Office Building vehicle trip rates in the TIS, therefore, understates Project impacts in both the CEQA and non-CEQA transportation analyses.

8-2  
(cont.)

Further, the Draft EIR indicates that the proposed single-tenant office buildings will include 536,000 square feet of gross floor area and be designed to accommodate 2,400 employees. Given that office land use vehicle trips correlate better with number of employees than the amount of gross floor area, number of employees is the more accurate and conservative independent variable to use for the estimation of proposed Project vehicle trips.

8-3

In addition, the TIS took existing use vehicle trip credits for 51,500 square feet of office space and 24,600 square feet of furniture retail space presumed to be active on the Project site. However, the report describes the furniture retail space as being active prior to October 2020, while the traffic volume counts for the study intersections and street segments were collected in March and May 2022. As such, vehicle trips from the inactive furniture retail space were not present during collection of the 2022 traffic counts, and no trip deductions for this prior use should have been assumed in the Project trip generation calculations. Use of empirical data to determine the existing use traffic volumes would be preferred, as the primary existing use driveway was counted as part of the May 2022 data collection.

8-4

It is requested that a more refined, intersection-level Project trip distribution pattern be provided for the Project. The trip distribution pattern provided in Figure 7 (page 45) of the TIS does not provide the level of detail suitable for an in-depth review of inbound and outbound turning movement assumptions at area intersections.

8-5

**INTERSECTION AND SEGMENT OPERATIONS ANALYSES**

Per the City of Culver City *Transportation Study Criteria and Guidelines* (TSCG) adopted in July 2020, analyses of signalized and non-signalized intersections in transportation studies shall be conducted using the latest version of the Highway Capacity Manual (HCM) published by the Transportation Research Board (TRB). Recent versions of the HCM were released earlier this year (2022), in 2016, and in 2010. While the Project TIS report indicates that the Synchro software and 2016 version of the HCM were used for intersection analyses, the TIS appendices show that the 2000 version of the HCM was used for the majority of the study intersection analyses (8 of 13). No explanation is provided for the use of a 22-year-old version of the HCM for the analysis of a majority of the study area.

8-6

In terms of accurately describing existing traffic operations and forecasting future traffic operations at intersections in the vicinity of the Project site, the Synchro software has limitations. Intersections are analyzed as stand-alone facilities within Synchro and do not account for the effects of nearby intersections and downstream congestion. As described in the approved Memorandum of Understanding (MOU) included as Appendix A to the TIS, it was assumed "that the intersection analysis will require microsimulation in the immediate vicinity of the Project site to correctly evaluate the closely-spaced intersections and new geometric and signal changes that have taken place since 2019." Given the high level of congestion in the Project area, especially for westbound and eastbound traffic along the Venice Boulevard/Washington Boulevard corridors during the weekday AM and PM peak hours, respectively, a microsimulation analysis is necessary to accurately determine traffic operations and Project impacts. However, no microsimulation analysis is included in the TIS. Additionally, existing and future transportation analyses in the TIS were performed assuming that the MOVE Culver City Downtown Corridor project will be a permanent fixture along Washington Boulevard. Given that the mobility lane project is in the pilot phase and is not guaranteed for implementation in the future, analyses without and with the mobility lane project should be provided.

8-7  
8-8



A detailed analysis should be provided of the Project’s potential impacts to land uses and businesses that take access and deliveries from Washington Boulevard, along the roadway segments west and east of National Boulevard. These segments are currently affected by the MOVE Culver City Downtown Corridor project and would be most impacted by the Project’s added vehicular traffic. If the Project is expected to add vehicle trips to segments of Washington Boulevard that presently have constrained access/egress conditions for neighboring properties, the Project should provide appropriate improvement measures to maintain adequate access/egress for these neighboring properties. Heavy vehicle access should be evaluated for neighboring properties, as well. The analysis should determine if the cumulative impact of the Downtown Corridor project roadway modifications, Project traffic, and related project traffic would impede heavy vehicle access to neighboring properties along Washington Boulevard. Vehicle queuing analyses should be performed at neighboring property driveways along these segments of Washington Boulevard, to ensure that expected vehicle congestion and queuing do not hinder vehicles from entering and exiting neighboring properties.

8-9

It is also worth noting that the approved MOU included as Appendix A to the TIS describes a study area with 22 intersections. However, the Project TIS limits the study intersection analysis to only 13 intersections. The reasoning for the reduction in intersections is not provided. It is also noted that *net* Project turning movement volumes (proposed minus existing) were analyzed at the proposed Project driveway intersections, when the analysis should have been for *proposed* Project turning movement volumes. The Project driveway intersections should be analyzed using the vehicle trips labeled “TOTAL DRIVEWAY TRIPS” in Table 8 (page 44) of the TIS.

8-10

The Project neighborhood street segment analysis indicates that the Project is expected to contribute a non-negligible number of vehicle trips to only one neighborhood street segment (Hutchison Avenue, between Venice Boulevard and Washington Boulevard). One neighborhood street segment seems like a low number, and provision of a more refined Project trip distribution pattern (see above) would go a long way in explaining the choice is neighborhood street segments for analysis. It is also worth noting that the Project comes very close to creating a significant condition on Hutchison Avenue (Project-related increase in daily volume of 11.9 percent where the significance threshold is 12.0 percent), and this is based on the use of less-than-conservative Project vehicle trip assumptions.

8-11

**TRANSIT OPERATIONS**

The description of existing transit service in the Project study area is based on conditions prior to the COVID-19 pandemic and, therefore, does not provide an accurate assessment of current transit service. While on its face this dated description may appear to have no bearing on the TIS findings, the use of pre-pandemic transit service levels may be used to:

8-12

- Justify the use of lower-than-appropriate vehicle trip generation rates associated with the Dense Multi-Use Urban setting per the ITE *Trip Generation Manual*
- Overstate the effectiveness of transit-related Transportation Demand Management (TDM) measures

The Project TIS identified potential substantial issues for transit service along Venice Boulevard, specifically to Metro Local Line 33, due to the addition of Project transit trips. However, no improvement measures were proposed for the Project, as is recommended in the City of Culver City TSCG. It should also be noted that the “transit” trips evaluated in the Project TIS are actually transit vehicle-trip equivalents, per the Project trip generation calculations in Table 8 (page 44) of the TIS. These transit vehicle-trip equivalents should be converted to transit person trips to provide an accurate transit analysis of Project impacts.

8-13





**SITE DESIGN AND OPERATION**

We have concerns about the close spacing of the Project’s proposed driveways on Washington Boulevard and National Boulevard to the adjacent signalized intersections (at Wesley Street and Ivy Station, respectively). The TIS should explain better how these driveways will operate in conjunction with these existing signalized facilities.

8-14

In addition, more detail is requested on the design and function of the eastern alley that would provide driveway connections to Washington Boulevard and Venice Boulevard. The driveway level of service (LOS) analysis in the Project TIS shows that average delays for northbound vehicles turning right from the Venice driveway to Venice Boulevard will exceed three minutes per vehicle during the weekday PM peak hour under Horizon Year conditions. Can the vehicle queuing associated with these considerable delays be accommodated on the eastern alley? Will queues extend into the Project parking structure? Will Helms Bakery traffic utilize this alley and has that traffic been accounted for in the analysis? A more complete picture of how the parking structure, eastern alley, and driveway to Venice Boulevard will function must be provided.

8-15

**FREEWAY SAFETY ANALYSIS**

As part of the CEQA transportation analysis, a Freeway Safety Analysis was performed for the Project. It is noted that the safety analysis evaluated three State of California Department of Transportation (“Caltrans”) freeway off-ramp connections to the local surface street system. All three of the off-ramps were westbound off-ramps of the Interstate 10 (I-10) Freeway. Why were no eastbound off-ramps analyzed? The analysis of the I-10 Freeway/Robertson Boulevard Interchange does not appear to consider the extreme congestion in the area caused by traffic spillback on Robertson Boulevard, Robertson Place, Exposition Boulevard, National Boulevard, Ellis Avenue, and Venice Boulevard. The inefficiencies in circulation caused by the outdated design and extreme peak-period congestion on these facilities and the surrounding study area must be addressed as a part of the CEQA and non-CEQA operations and safety analyses.

8-16

**SUMMARY**

As outlined above, we have concerns about the depth of the Project’s transportation impact analysis. The Project has been identified to have potentially substantial adverse effects to local intersections, neighborhood street segments, and transit operations. Yet, the Project proposes little in the form of mitigation and improvement measures. Even the voluntary TDM program’s influence is nebulous, with no quantified reductions in vehicle trips, queuing, delay, and impacts to local businesses including access/egress to their properties for customers and deliveries. With the potential to have such a deleterious effect on mobility in an already constrained area, a more expansive set of improvements should be provided that is supported by calculated results.

8-17



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

September 6, 2022

[Jeff.anderson@culvercity.org](mailto:Jeff.anderson@culvercity.org)

Jeff Anderson, Contract Planner  
City of Culver City Current Planning Division  
9770 Culver Boulevard  
Culver City, California 90232

## Draft Environmental Impact Report (EIR) for the Proposed Crossings Campus Project (Proposed Project) (SCH No.: 2021110079)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Culver City is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction.

9-1

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

Based on the Draft EIR, the Proposed Project consists of demolition of single-story warehouses and surface parking lots and construction and operation of two buildings with subterranean parking totaling approximately 536,000 square feet on an approximately 4.46-acre site.<sup>1</sup> The Proposed Project is located on the northeast corner of National Boulevard and Washington Boulevard in the City of Culver City and in the City of Los Angeles. A Phase I Environmental Site Assessment (ESA) noted that a former gasoline service station site is located within 200 feet of the Proposed Project and that the former gasoline service station site was investigated and remediated for fuel that leaked from tanks.<sup>2</sup> Construction of the Proposed Project is anticipated to begin in the first quarter of 2023 and last approximately three years.<sup>3</sup>

9-2

### South Coast AQMD Staff's Comments on the Draft EIR

#### *CEQA Regional Air Quality Impacts Analysis for Cleanup Activities During Construction*

Based on the Hazards and Hazardous Materials Section in the Draft EIR, Phase I ESA site investigation results indicated that elevated concentrations of components of gasoline and perchloroethylene (PCE) have been detected in the groundwater at the former gasoline service station site near the Proposed Project site and that such contamination has reportedly migrated generally to the Proposed Project site.<sup>4</sup> Soil sampling investigations were thus conducted at the Proposed Project site to evaluate current conditions. This process showed that soil at the Proposed Project site may contain concentrations of gasoline components and PCE that are above the acceptance criteria for a receiving site or disposal facility.<sup>5</sup> To accommodate the subterranean parking for the Proposed Project, during construction fill and soil would be excavated and removed from under the current buildings to a depth of about 50 feet. Such soil would then be reused or disposed of offsite.<sup>6</sup> It is unclear in the Draft EIR, however, if the Lead Agency completely analyzed air quality impacts from such soil cleanup activities.

9-3

<sup>1</sup> Draft EIR. Executive Summary. Page ES-1.

<sup>2</sup> *Ibid.* Hazardous and Hazardous Materials. Page 4.7-20.

<sup>3</sup> *Ibid.* Project Description. Page 2-18.

<sup>4</sup> *Ibid.* Hazardous and Hazardous Materials. Page 4.7-19 through 4.7-20.

<sup>5</sup> *Ibid.* Page 4.7-23 through 4.7-25.

<sup>6</sup> *Ibid.* Page 4.7-25.

Since cleanup activities could include the removal and disposal of contaminated soil, and depending on the type of contamination, contaminated soil may not be accepted at the landfill site 30 miles away from the Proposed Project site,<sup>7</sup> such soil may need to be disposed of at a permitted hazardous disposal facility outside Los Angeles County with a one-way truck trip length that is longer than 30 miles. If it is reasonably foreseeable at the time of the release of the Draft EIR that the Proposed Project would likely involve remediation of contaminated soil, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of any reasonably foreseeable soil remedial or mitigation activities, quantify emissions from those activities, and include those emissions in the Proposed Project’s regional construction emissions profile to be compared to South Coast AQMD’s regional air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. If those emissions are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. If the reason for not including them in the Final EIR is because remedial or mitigation measures have not been fully developed or approved prior to the certification of the Final EIR, the Lead Agency should commit to evaluating the air quality impacts from those activities through a CEQA process when the measures become known and prior to allowing the commencement of any soil remedial or mitigation activities at the Proposed Project.

9-4

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, when the Lead Agency’s position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

9-5

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang  
 Program Supervisor, CEQA IGR  
 Planning, Rule Development & Implementation

SW:EA  
LAC220726-09  
 Control Number

---

<sup>7</sup> *Ibid.* Air Quality. Page 4.2-41.



LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

Jordan R. Sisson
801 South Grand Avenue, 11th Floor
Los Angeles, California 90017
Direct: (951) 542-2735
Fax: (213) 623-7755
E-mail: jordan@gideonlaw.net
www.gideonlaw.net

September 6, 2022

VIA EMAIL:

Jeff Anderson, Contract Planner
City of Culver City, Current Planning Division
jeff.anderson@culvercity.org

RE: Crossings Campus Draft EIR Comments (SCH No. 2021110079)

Dear Mr. Anderson:

On behalf of UNITE HERE Local 11 ("Local 11"), this office respectfully provides the following comments1 to the City of Culver City ("City") with regard to the Draft Environmental Impact Report ("DEIR") for the proposed demolition of three existing warehouse structures totaling 105,047 square feet ("sf") and the proposed construction of a two-structure, 536,000-sf office complex ("Project") located on a 4.46-acre site with split-jurisdiction ("Site") intended to be occupied by Apple Inc. (DEIR, p. 2-1-2-2.) The Project includes a four-story (56'), 167,000-sf office building on a 1.63-acre parcel under the City's jurisdiction ("Culver City Parcel"); and a five or six-story (56' - 75'), 369,000-sf office building on a 2.83-acre parcel under the City of Los Angeles jurisdiction ("Los Angeles Parcel").2

10-1

In furtherance of the Project, Culver Crossing Properties, LLC ("Applicant") is seeking various project approvals under the Culver City Municipal Code ("CCMC"), including approvals for Planned Development; a Comprehensive Plan; extended Hours of Construction; and various other project approvals under the Los Angeles Municipal Code ("LAMC"), including a boundary change to the Expo TNP; Amendment of the CPIO; Site Plan Review; Waiver of Dedication; and Tree Removal Permit (collectively "Entitlements"). (See DEIR, pp. 2-24.) Additionally, for the California Environmental Quality Act ("CEQA"),3 the Environmental Impact Report and associated approvals ("EIR")4 will be considered for adoption by both the City (as lead agent) and the City of Los Angeles (as a responsible agent).

In short, the Project has a significant energy impact by failing to provide feasible onsite renewable energy. Additionally, adding this Project to existing office space by the same tenant (Apple, Inc.) will turn an entire city block into what Local 11 believes may be an underutilized, over-parked, single-tenant office district—contrary to sound mixed-use smart growth principles. If the City is serious about making strides toward its housing obligations, it needs to prioritize genuine mixed-use projects with housing. So too, the DEIR fails to identify significant greenhouse gas ("GHG") impacts.

10-2

1 Herein, page citations are either the stated pagination (i.e., "p. #") or PDF-page location (i.e., "PDF p. #").

2 For purposes of CEQA, the City of Los Angeles is serving as Responsible Agency.

3 Including "CEQA Guidelines" codified at 14 Cal. Code. Regs. § 15000 et seq.

4 Inclusive of Draft EIR ("DEIR") and all associated appendices ("APP-##") retrieved from https://www.culvercity.org/City-Projects/G-Planning-Projects.



For these reasons, Local 11 respectfully asks the City not to grant the Entitlements and EIR (collectively “**Project Approvals**”) until the issues discussed herein are addressed in a CEQA-compliant EIR that includes additional mitigation measures that reduce the Project’s impact on energy, GHG, and housing impacts.

↑  
10-2  
(cont.)

**I. LOCAL 11’S STANDING**

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix—including thousands of members who live and/or work in the City and the City of Los Angeles. The union has a First Amendment right to petition public officials in connection with matters of public concern, including compliance with applicable zoning rules and CEQA, just as developers, other community organizations, and individual residents do. Protecting its members’ interest in the environment, including advocating for the environmental sustainability of development projects and ensuring the availability of housing and hotels (in compliance with state and local rules), is part of Local 11’s core function. Recognizing unions’ interest and union members’ interest in these issues, California courts have consistently upheld unions’ standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) Furthermore, Local 11 has public interest standing to challenge the Project Approvals given the City’s public duty to comply with applicable zoning and CEQA laws, which Local 11 seeks to enforce. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; *Weiss v. City of Los Angeles* (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

↑  
10-3

**II. SPECIFIC PROJECT/DRAFT EIR COMMENTS**

**A. SIGNIFICANT ENERGY IMPACTS ASSOCIATED WITH FAILURE TO PROVIDE AND MITIGATE WITH ON-SITE SOLAR**

CEQA requires an EIR to analyze a project’s energy consumption. (Pub. Res. Code § 21100(b)(3).) In addition to examining whether there is a “wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources,” lead agencies must investigate whether any renewable energy features could be incorporated into the project. (CEQA Guidelines § 15126.2(b); *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 167-168 [duty to investigate renewable energy option is required as part of determining whether project impacts on energy resources are significant].) A project’s compliance with building codes may not be enough where they do not address many considerations under Appendix F of the CEQA Guidelines, like “whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building’s envelope ... [.] energy impacts for a project intended to transform agricultural land into a regional commercial shopping center.” (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.)

↑  
10-4  
↓

Here, the Project lacks any onsite solar even though the California Building Code (“**CBC**”), as adopted by the City, generally requires one kilowatt (1 kW) of solar photovoltaic system per 10,000 sf of new development. (DEIR, PDF pp. 235, 727 [CBC § 117.1].) Instead, the Project relies on an exception allowing it to pay an in-lieu fee to have solar built on other City properties. (DEIR, PDF p. 258, 343 [CBC § 117.2].) This fee option, however, should only apply if it is infeasible to install solar

“due to the configuration of the proposed construction project” (CBC § 117.2), which begs the question: why would the Applicant configure the Project in such a way to make solar infeasible? Moreover, mere compliance with the CBC exemption does “not meet the requirements of appendix F of the CEQA Guidelines.” (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264.) The relevant question is whether wasteful use of energy can be avoided or renewable energy could be incorporated into the Project. (CEQA Guidelines § 15126.2(b).)

10-4  
(cont.)

The DEIR fails to explain why solar cannot be incorporated into the Project. The Applicant’s neighbor, the historic Helms Bakery district, found it feasible to add solar on roughly one-quarter of its rooftops—nearly twenty years ago.<sup>5</sup> Fast forward to today, single-family homes are expected to do their part to ready California for an all-electric future (e.g., onsite solar, battery storage, electric heat pumps, etc.).<sup>6</sup> Contrary to claims otherwise, the Project’s lack of solar leads to wasteful energy use. There is no enforceable mitigation condition ensuring the Project will not opt out of the 100 percent renewable option (i.e., Clean Power Alliance) by instead choosing power provided by SoCal Edison (“SCE”), and where SCE already had difficulty meeting even 33 percent renewable energy portfolio target in 2020. (DEIR, pp. 4.4-10, 4.4-14.) There is no assurance that just because SCE and the Los Angeles Department of Water and Power (“LADWP”) may have a “long-term plan,” they will ultimately hit their 2030 and 2045 targets. (DEIR, p. 4.4-26.) Furthermore, providing solar onsite immediately reduces the Project’s wasteful use of grid energy, compared to waiting an undetermined time for the City to use in-lieu fees. It seems that incorporating onsite solar would be the superior choice to avoid wasteful use of energy resources.

10-5

Only onsite solar capitalizes on this unique opportunity. The City is heavily built out, and its solar program does not apply to many uses (e.g., 1- and 2-family residences, parking structures, garages, etc.). (CBC § 117.1.A.) Thus, the Project presents a unique opportunity for the City to (i) expand its renewable energy sources while also (ii) decreasing the Site’s reliance on potentially dirtier energy (i.e., furthering two of three goals listed in Appendix F). As the State moves closer to a full-electric future and more is demanded from the electrical grid, it must capitalize on opportunities to expand its renewable energy sources.

In sum, the Project’s failure to provide onsite solar is a significant energy impact that requires more mitigation.

**B. PROJECT PIECEMEALING LEADS TO AN OVERPARKED, SINGLE-USE, APPLE-ONLY DISTRICT**

A project’s CEQA review must assess “the whole of an action” to ensure that all of the project’s environmental impacts are considered. (CEQA Guidelines § 15378; *San Joaquin Raptor/Wildlife Rescue Center v. Cnty. of Stanislaus* (1994) 27 Cal.App.4th 713, 730 [held use of “truncated project concept” violated CEQA where EIR was otherwise adequate].) That means the environmental consequences of a project cannot be “submerged by chopping a large project into many little ones – each with a minimal potential impact on the environment - which cumulatively may have disastrous consequences.” (*Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283-284; see also *City*

10-6

<sup>5</sup> Power Engineering (2/4/03) Historic Helms Bakery building taps into the sun with new solar power system, <https://www.power-eng.com/renewables/historic-helms-bakery-building-taps-into-the-sun-with-new-solar-power-system/#gref>.

<sup>6</sup> Cal. Energy Commission (8/11/21) Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions From Homes and Businesses, <https://www.energy.ca.gov/news/2021-08/energy-commission-adopts-updated-building-standards-improve-efficiency-reduce-0>.



of Santee, 214 Cal.App.3d at 1452. Thus, there can be no segmenting of a large project into two or more smaller projects to mask serious environmental consequences or evade CEQA review. (See CEQA Guidelines § 15378(a); *McQueen v. Bd. of Supervisors* (1988) 202 Cal.App.3d 1136, 1146-47.)

↑ 10-6 (cont.)  
10-7  
10-8  
↓

Here, the Project is a 536,000-sf Apple office development right next to an existing 4-story, 128,000-sf Apple offices with minimal ground-floor retail that completed construction within the year. (DEIR, pp. 2-2 – 2-4.7) Hence, in two projects, Apple will have converted an entire city block into an *Apple-office-only zone*, which is comprised of three office buildings, all 4-5 story tall, totaling 664,000 sf, on a whole city block (appx. 236,815 sf),<sup>8</sup> resulting in roughly 2.80 floor-area-ratio. The impacts of all this should be analyzed together, *in toto*.

Based on the Project’s estimated employees (i.e., 2144) and combined site (i.e., 4.46-acre), the site generates roughly 480 employees per acre. (DEIR, APP-M, PDF p. 28.) Furthermore, at 1,216 automobile parking spots, the Project is admittedly overparked by at least 74 spaces. (DEIR p. 4.12-28.) This amounts to a single-use, single-tenant project that is overparked and leaves mixed-use and increased density off the table—a squandered opportunity to capitalize on the housing needs in the metro-adjacent area.

**C. HOUSING IMPACTS NEED BETTER CEQA ANALYSIS**

The CEQA Initial Study Checklist, used to determine whether a project may have significant environmental impacts, includes the question of whether a project may “[c]onflict with any applicable land use plan, policy, or regulation ... adopted for the purpose of avoiding or mitigating an environmental effect.” (*Guidelines*, appen. G; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 929 (EIR required to analyze project’s inconsistency with City land use ordinance for planned developments).) A project is inconsistent if it conflicts with a fundamental, mandatory and specific land use policy. (*Families Unafraid to Uphold Rural etc. County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1342.) Furthermore, a project that causes a loss of housing stock, land available for housing, or violates zoning laws designed to encourage housing, can pose a potentially significant impact that must be considered under CEQA. (*Concerned Citizens v. Los Angeles Unified School District* (1994) 24 Cal.App.4th 826, 838 (SEIR acknowledged significant adverse impact on affordable housing stock); *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1038-39 (loss of housing can constitute a potentially significant impact necessitating adequate mitigation measures).)

///

<sup>7</sup> See [GoogleMaps](https://www.google.com/maps/@34.05735, -118.23745, 15z) (showing structure still being built as of November 2021); AppleWorld Today (10/8/21) Apple Is Building New Two Entertainment Facilities in L.A., <https://www.appleworld.today/archives/77243>; LAUrbanize (6/10/19) Apple’s New Culver City Office Building is Topped Out, <https://la.urbanize.city/post/apples-new-culver-city-office-building-topped-out>.

<sup>8</sup> See <http://zimas.lacity.org/>.

This overparked, Apple-only mega-block appears to be a continuation of development patterns that likely have led to the City’s severe housing shortage.<sup>9</sup> The City recognizes the mismatch between jobs and house growth, most recently reflected in the City’s Housing Element 2021-2029 (“**Housing Element**”)<sup>10</sup> presented to City Council on August 8, 2022. For example, in 2016, the City’s 2.8 jobs-to-housing ratio was more than double that of the County’s 1.3 jobs-to-housing ratio; the City’s jobs-to-housing ratio has only worsened in recent years. (Housing Element, pp. 11-12.) To put in context, the job-to-housing ratio in the relevant Competitive Market Area (i.e., nearby westside cities) would be 1.5:1—meaning “pent-up” demand for housing based on below 2020 numbers would be approximately 23,000 additional units.<sup>11</sup>

Table 6: Culver City Jobs to Housing Ratio

	2016	2020	2035	2045
Total Jobs	49,935	60,312	62,303	64,071
Housing Units	17,528	17,146	17,675	18,014
Jobs to Housing Ratio	2.8	3.5	3.5	3.6

Sources: American Community Survey 2012-2016; Census Transportation Planning Products 2012-2016; 2020 Regional Transportation Plan/Sustainable Communities Strategy Data/Map Book, SCAG 2017.

10-8  
(cont.)

In addition to a poor track record, the City now faces a steep increase in its Regional Housing Need Allocation (“**RHNA**”) obligations. Through the 2029 planning period, the City is looking at a 2,272 new affordable unit obligation (i.e., moderate income or below). (Housing Element, p. 38.) That is more than six times greater than the 333 net new housing units added by the City during the prior 2013-2021 Housing Element Cycle. (Id., at p. 15) (see below.)

Table 31: 2021-2029 Regional Housing Needs Assessment for Culver City

Extremely Low*	Very Low	Low	Moderate	Above Moderate	Total
554	554	604	560	1,069	<b>3,341</b>
16.5%	16.5%	18.0%	17.0%	32.0%	<b>100%</b>

In sum, the City cannot expect to improve the City’s job-housing imbalance and start chipping away at its housing obligations if it continues to prioritize office projects like this over housing—especially near transit. This is a significant land use inconsistency not disclosed in the DEIR.

<sup>9</sup> See Housing Element, pp. B-8 (discussing non-residential development); UCLA (June 2020) Urban Design Report: Reimagining The Transit Gateway Of Culver City, pp. 15, 18 (discussing increase in employment population, rent-burden population, and City’s low rate of permitting multi-family, <https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f2b537946f58f297df7a323/1596674944940/3+Transit+Gateway+June+2020+Final.pdf>; p. 5, 25, 29, 32-33 (nearly 50 times as many jobs as housing since 2002, City’s job growth since 2002 has been nearly 2.5 times higher than LA County with information industry leading the way , exacerbating longer commutes as less than 10% of residents work in the City, and City has added 49 jobs per house unit as compared to the County’s 2.4 jobs per housing unit.),  
<sup>10</sup> [https://www.culvercity.org/files/assets/public/documents/community-development/advance-planning/general-plan/housing-element/2022-08-08\\_att3\\_housing-element-redline.pdf](https://www.culvercity.org/files/assets/public/documents/community-development/advance-planning/general-plan/housing-element/2022-08-08_att3_housing-element-redline.pdf).  
<sup>11</sup> City (May 2020) General Plan Update: Socio-Economic Profile & Market Analysis, pp. 7-9, 32-33, 37-38, [https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5ed154e8ef385f43440f6ff7/1590777081261/CCGPU\\_DemographicProfileMarketAnalysis\\_2020\\_0529.pdf](https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5ed154e8ef385f43440f6ff7/1590777081261/CCGPU_DemographicProfileMarketAnalysis_2020_0529.pdf).



**D. DEIR’S GHG ANALYSIS IS FUNDAMENTALLY FLAWED**

The California Supreme Court demands a robust GHG analysis to assess a project’s impact on climate change. Lead agencies must provide “the contours of their logical argument,” leaving no “analytical gaps” in the analysis, and supporting determinations “through substantial evidence and reasoned explanation.” (*Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* (“*Newhall Ranch*”) (2015) 62 Cal.4th 204, 227; see also *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (“*Cleveland II*”) (2017) 3 Cal.5th 497, 504, 519 [analysis must be “based to the extent possible on scientific and factual data ... stay[ing] in step with evolving scientific knowledge and state regulatory schemes.” (Quoting CEQA Guidelines § 15064(b)).] This analysis must include good faith efforts to disclose a project’s anticipated emissions and consider consistency with the State’s GHG reduction requirements, such as: reducing to 1990 GHG emission levels by 2020 (i.e., AB 32); 40 percent below 1990 levels by 2030 (i.e., SB 32); and 80 percent below 1990 levels by 2050 (i.e., Executive Order S-3-05). (See CEQA Guidelines § 15064.4.)

10-9

Here, the DEIR claims the Project has no GHG impacts because it would be consistent with the Southern California Association of Governments (“**SCAG**”) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (“**RTP/SCS**”),<sup>12</sup> California Air Resources Board (“**CARB**”) Climate Change Scoping Plan,<sup>13</sup> the City’s Green Building Program, the Los Angeles Green New Deal, and the Los Angeles Green Building Code. (DEIR, pp. 4.6-42, 4.6-68.) However, this conclusion is incorrect for the following reasons.

**1. Qualitative Analysis Relies on Non-Binding, Non-CAP Plans Not Specific to Local Land Use Projects**

Referencing CEQA Guidelines §§ 15064(h)(3) and 15064.4(b), the Draft EIR suggests the referenced CARB, SCAG, and local plans are equivalent to a qualified GHG reduction plan or Climate Action Plan (“**CAP(s)**”). (See DEIR, pp. 4.6-35-36.) This is an inaccurate reading of these sections.

First, Section 15064(h)(3) permits lead agencies to find projects not cumulatively considerable when a project complies with an approved plan or mitigation program that “provides specific requirements that will avoided or substantially lessen the cumulative problems within the geographic area in which the project is located ... [ and] the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project’s incremental contribution to the cumulative effect is not cumulatively considerable.” (Emphasis added). When adopted, the Resources Agency explained that this subsection provides a “rebuttable presumption” for “certain” plans, such as local CAPs that “contain specific requirements with respect to resources that are within the agency’s jurisdiction to avoid or substantially lessen the

10-10

<sup>12</sup> See e.g., SCAG (Apr. 2016) 2016-2040 RTP/SCS (“**2016 RTP/SCS**”), <https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557>, and associated Program EIR (“**2016 RTP/SCS PEIR**”), [https://scag.ca.gov/sites/main/files/file-attachments/2016dpeir\\_complete.pdf?1624320652](https://scag.ca.gov/sites/main/files/file-attachments/2016dpeir_complete.pdf?1624320652); SCAG (9/3/20) 2020-2045 RTP/SCS (“**2020 RTP/SCS**”), [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176), and associated Program EIR (“**2020 RTP/SCS PEIR**”), [https://scag.ca.gov/sites/main/files/file-attachments/fpeir\\_connectsocal\\_complete.pdf?1607981618](https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618).

<sup>13</sup> See e.g., CARB (Nov. 2017) California’s 2017 Climate Change Scoping Plan (“**2017 Scoping Plan**”), [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf); CARB (5/10/22) “**Draft 2022 Scoping Plan Update**,” <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf>.

*agency’s contributions to GHG emissions ....”* (2009 Final Statement of Reason,<sup>14</sup> pp. 14-15.) As further explained, “consistency with plans that are *purely aspirational* (i.e., those that include *only unenforceable goals without mandatory reduction measures*), provides no assurance that emissions within the area governed by the plan will actually address the cumulative problem, *may not achieve the level of protection necessary to give rise to this subdivision’s presumption.*” (Id., at p. 16 [emphasis added]). Hence, lead agencies must “draw a link between the project and the specific provisions of a *binding* plan or regulation,” before the subsection (h)(3) rebuttable presumption is to take effect. (Id. [emph. added].)

10-10  
(cont.)

Next, Section 15064.4(b)(3) states that a relevant factor for lead agencies’ GHG analysis to consider is the “extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (*see, e.g., section 15183.5(b).*)” (Emph. added.) Section 15183.5(b) confirms that “[p]ursuant to *sections 15064(h)* ... a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program *under specified circumstances.*” (Emphasis added.) Those specified circumstances include the detailed plan elements needed for a CAP (i.e., inventorying of existing/anticipated GHGs, establishing reduction goal, anticipating project emissions, identifying specific measures including performance standards, monitoring CAP implementation, and adopting CAP via CEQA process). (Id., at subdivision (b)(1)(A)-(F).) As explained by the Resources Agency, section 15064.4(b)(3) was amended to specifically reference section 15183.5(b) because it was “needed to clarify that lead agencies may rely on plans *prepared pursuant to section 15183.5* in evaluating a project’s [GHG] emissions ... [and] consistent with the Agency’s Final Statement of Reasons for the addition of section 15064.4, which states that ‘proposed section 15064.4 is *intended to be read in conjunction with ... proposed section 15183.5.* Those sections each indicate that local and regional plans may be developed to reduce GHG emissions.’ [2009 Final Statement of Reason,<sup>15</sup> p. 27][.]” (2018 Final Statement of Reason,<sup>16</sup> p. 19 [emphasis added]).

10-11

Here, *none* of the plans cited by the Draft EIR—including the local plans—are a qualified CAP that includes project-specific measures and features that are project-specific, mandatory, tethered to quantifiable data, and directly serve to reduce the local projects’ contribution to GHG emissions. (DEIR, pp. 4.6-29-4.6-33, 4.6.36-4.6-37.) Additionally, the vast majority of the cited regulatory measures in the DEIR are not Project-specific and/or are entirely the responsibility of State and regional agencies to adopt regulations that the Project cannot claim credit for (e.g., Cap-and-Trade, Renewables Portfolio Standard, Low Carbon Fuel Standards, Advanced Clean Cars Program, Short-Lived Climate Pollutant Strategy, etc.). (DEIR, Tbls. 4.6-6, 4.6-7.) It would be “misguided” to suggest Cap-and-Trade or other state regulations cover mobile emissions from local

<sup>14</sup> Resources Agency (Dec. 2009) Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines, [https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf).

<sup>15</sup> Ibid.

<sup>16</sup> Resources Agency (Nov. 2018) Final Statement of Reasons for Regulatory Action: Amendments to The State CEQA Guidelines, [https://files.resources.ca.gov/ceqa/docs/2018\\_CEQA\\_Final\\_Statement\\_of%20Reasons\\_111218.pdf](https://files.resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf).

land-use projects.<sup>17</sup> Furthermore, neither SCAG’s RTP/SCS nor CARB’s Scoping Plan are binding on local agencies’ approval of local land use projects.<sup>18</sup>

10-11  
(cont.)

In sum, the Draft EIR relies entirely on non-binding, aspirational GHG goals that are not specific to the reduction of the City’s fair share of GHG emissions from local land use developments and, thus, do not meet the requirements of CEQA Guidelines §§ 15064(h)(3) or 15064.4(b)(3).

**2. Sustainable Features Are Overblown**

As previously discussed, the Project suffers numerous flaws, including failing to incorporate onsite solar or provide any reasonable explanation for why solar would be infeasible. Additionally, rather than maximizing density and bringing a variety of uses that can capitalize on the Site’s proximity to the Culver City Metro station, the Project leaves increased density, including housing, off the table and excludes all but one use and one tenant from this City-block. Furthermore, this 100 percent commercial Project will continue the same type of development pattern that likely has contributed to a serious housing imbalance in the City. These design flaws cut against numerous GHG reduction strategies cited by the Draft EIR (e.g., Million Solar Roofs Program, develop residential and employment developments, net zero carbon by 2030, 95 percent of electricity generation would be zero carbon, etc.). (DEIR, pp. 4.6-45, 4.6-54, 4.6-57,4.6-62.) We also note the Project’s proposed removal of 19 street trees. (DEIR, pp. 2-12, 4.1-22; Initial Study, Street Tree Report,<sup>19</sup> PDF p. 76.) The removal of trees can also be considered a significant impact warranting mitigation. To the extent mature street trees can remain in place and be accommodated on site, they should not be removed. If replacement is required, we ask that the City consider mitigation to the following effect:

10-12

*All required replacement street trees shall be comprised of California native/indigenous trees. California native/indigenous trees include but are not limited to the trees designated “California Native” on the Tree People City of Los Angeles Approved Street Tree List: <https://www.treepeople.org/wp-content/uploads/2021/02/TreePeoples-LA-City-Approved-Street-Tree->*

<sup>17</sup> CARB (12/5/18) RE Centennial Specific Plan Final EIR, pp. 3-4, 6-7, 10-11, <https://ww3.arb.ca.gov/toxics/ttdceqalist/centennialfeir.pdf>; see also Draft 2022 Scoping Plan, p. 218 (“There is much local jurisdictions can do to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—do not substitute for these local efforts.” Emphasis added.)

<sup>18</sup> See e.g., 2020 RTP/SCS, p. xiv (“There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal ... SCAG will maintain communication with agencies that use SCAG’s sub jurisdictional-level data to ensure that the ‘advisory and nonbinding’ nature of the data is appropriately maintained.” Emphasis added); 2020 RTP/SCS PEIR, pp. 3.8-33 (“[CARB] published the 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (CARB Report) which includes non-binding technical information on what level of statewide VMT reduction, in the judgment of CARB staff, would promote achievement of statewide GHG emission reduction targets.” emphasis original); 2017 Scoping Plan, p. 99 (“Local government efforts to reduce emissions within their jurisdiction are critical to achieving the State’s long-term GHG goals ... To support local governments in their efforts to reduce GHG emissions, the following guidance is provided ... While this guidance is provided out of the recognition that local policy makers are critical in reducing the carbon footprint of cities and counties, the decision to follow this guidance is voluntary and should not be interpreted as a directive or mandate to local governments.” Emphasis added.)

<sup>19</sup> <https://www.culvercity.org/files/assets/public/documents/community-development/current-projects/8825-national-project-crossings/ceqa-documents/project-crossings-initial-study.pdf>.

*List.pdf. When feasible, new landscaping shall be comprised of California native/indigenous water-conserving plants, in substantial conformance with project plans (provided in Attachment B). California Native/indigenous plants include but are not limited to plants listed by the Metropolitan Water District and the California Native Plant society in their Planting Guide for LA County: [https://www.bewaterwise.com/assets/mwd\\_plantguide-screen\\_la\\_4\\_23.pdf](https://www.bewaterwise.com/assets/mwd_plantguide-screen_la_4_23.pdf).*

↑  
10-12  
(cont.)

**3. Quantitative Analysis Is Lacking, and Improper Rejection of SCAQMD Thresholds Hides the Project’s GHG Significance**

The Draft EIR refuses to use any numeric threshold and explicitly rejects the use of South Coast Air Quality Management District (“**SCAQMD**”) multi-tier GHG thresholds<sup>20</sup> because they purportedly were “not formally adopted.” (DEIR, pp. 4.6-27, 4.6-37.) This reasoning is inconsistent with the DEIR’s use of SCAQMD’s guidance elsewhere on methodology (DEIR, p. 4.6-39), and repeated use of the Los Angeles Green New Deal despite being “not an adopted plan.” (DEIR, p. 4.6-32.) Additionally, lead agencies routinely use SCAQMD’s multi-tier thresholds, including the City of Los Angeles’ prior use of Tier 3 screening threshold of 1,400 metric tons of CO2 equivalent per year (“**MTCO2e/yr**”) for commercial projects<sup>21</sup> and 3,000 MTCO2e/yr for mixed-use projects or non-industrial projects,<sup>22</sup> and SCAQMD’s Tier 4 performance standards of 4.8 (2020 year) and 3.0 (2035

↑  
10-13  
↓

<sup>20</sup> See SCAQMD (Oct. 2008) Draft Guidance Document – Interim CEQA GHG Significance Threshold, pp. 3-10 – 3-16, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf); see also SCAQMD (12/5/08) Board Letter, p. 5, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2); SCAQMD (9/28/10) Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group # 15, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf).

<sup>21</sup> See e.g., DCP Case No. ENV-2017-3855 (Oct. 2018) MND, PDF pp. 49-50, <https://planning.lacity.org/odocument/423baae0-300e-476d-add1-70364bb43d09/ENV-2017-3855.pdf>.

<sup>22</sup> See e.g., DCP Case No. ENV-2017-4170 (Dec. 2018) MND, PDF pp. 112-114The , <https://planning.lacity.org/odocument/03048272-13c8-4ed5-9331-01c45f38396f/ENV-2017-4170.pdf>; DCP Case No. ENV-2015-897 (Jan. 2016) Initial Study, PDF pp. 89-91, <http://planning.lacity.org/eir/nops/333LaCienega/is.pdf>; DCP Case No. ENV-2016-1604 (Apr. 2017) MND, PDF pp. 86-87, [https://planning.lacity.org/staffrpt/mnd/Pub\\_033017/ENV-2016-1604.pdf](https://planning.lacity.org/staffrpt/mnd/Pub_033017/ENV-2016-1604.pdf); DCP Case No. ENV-2017-3896 (Dec. 2018) MND, PDF pp. 41, <https://planning.lacity.org/odocument/77719943-bf70-4633-bc5d-19ad5c7f8a39/ENV-2017-3896.pdf>; DCP Case No. ENV-2016-1367-EIR (1/1/17) IS, PDF pp. 87-88, <https://planning.lacity.org/eir/EdinburghAve/DEIR/Appendix%20A%20-%20NOP%20IS%20and%20Comment%20Letters.pdf>; DCP Case No. ENV-2016-2384 (Jan. 2018) MND, PDF pp. 101-103, [https://clkrep.lacity.org/onlinedocs/2018/18-0827\\_misc\\_1\\_08-28-2018.0001.pdf](https://clkrep.lacity.org/onlinedocs/2018/18-0827_misc_1_08-28-2018.0001.pdf); Bureau of Engineering (“**BOE**”) W.O. E1908381 (3/13/19) CE, PDF pp. 4, 18, [https://clkrep.lacity.org/onlinedocs/2018/18-0392\\_rpt\\_BOE\\_03-13-2019.pdf](https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf); Council File (“**CF**”) No. 18-0392 project (3/13/19) CE, PDF pp. 547, 578, [https://clkrep.lacity.org/onlinedocs/2018/18-0392\\_rpt\\_BOE\\_03-13-2019.pdf](https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf); DCP Case No. ENV-2014-4288 (Oct. 2015) DEIR, PDF pp. 31-32, [https://planning.lacity.org/eir/5750HollywoodBlvd/DEIR/4.C\\_Greenhouse\\_Gas\\_Emissions.pdf](https://planning.lacity.org/eir/5750HollywoodBlvd/DEIR/4.C_Greenhouse_Gas_Emissions.pdf); DCP Case No. ENV-2016-1662 (Jun. 2017) DEIR, PDF p. 50, [https://planning.lacity.org/eir/ProvidenceTarzanaMedicalCtr/Deir/files/D\\_IVD.pdf](https://planning.lacity.org/eir/ProvidenceTarzanaMedicalCtr/Deir/files/D_IVD.pdf); DCP Case No. ENV-2017-628 (2/6/19) MND, PDF p. 72-73, <https://planning.lacity.org/odocument/64056bf9-e4b7-4085-b33f-89ced0b9dac5/ENV-2017-628.pdf>; DCP Case No. ENV-2019-6290 (Feb. 2021) MND, PDF p. 114-115, <https://planning.lacity.org/odocument/7cb38074-68db-4b01-b2bd-cb2034240cd5/ENV-2019-6290.pdf>; DCP Case No. ENV-2020-5838 (Jul. 2021) NegDec, PDF p. 106, <https://planning.lacity.org/odocument/6dd1558c-675d-46dd-85a3-cfa19e776b30/ENV-2020-5838.pdf>; DCP Case No. ENV-2019-5520-MND (Jul. 2021) IS, PDF pp. 84-85, <https://planning.lacity.org/odocument/37473b1c-89af-485c-a16b-1db96fb4b9c4/ENV-2019-5520.pdf>; DCP Case No. ENV-2020-6951 (Aug. 2021) MND, PDF p. 55, <https://>

year) MTCO<sub>2</sub>e/yr per service population (i.e., residents and employees) or similar efficiency standards.<sup>23</sup>

↑ 10-13  
 (cont.)

[planning.lacity.org/odocument/85a03721-39db-4b70-9078-f7220c76f336/ENV-2020-6951.pdf](https://planning.lacity.org/odocument/85a03721-39db-4b70-9078-f7220c76f336/ENV-2020-6951.pdf); ENV-2017-3972 (Sep. 2021) Subsequent MND, PDF pp. 82-85, <https://planning.lacity.org/odocument/b718e33a-4781-437f-a2a9-194d28bf36e4/ENV-2017-3972.pdf>; Case No. ENV-2020-2497 (Apr. 2020) SCEA, PDF p. 72, [https://planning.lacity.org/odocument/eb7f30da-32a8-4c66-810b-49d3431a1473/6\\_Sustainable\\_Communities\\_Environmental\\_Analysis.pdf](https://planning.lacity.org/odocument/eb7f30da-32a8-4c66-810b-49d3431a1473/6_Sustainable_Communities_Environmental_Analysis.pdf); ENV-2019-2314 (Mar. 2020) SCEA, PDF p. 35-37, [https://planning.lacity.org/odocument/2b972b78-9efa-4bc9-9b38-e6adcb55efc1/VI\\_Sustainable\\_Communities\\_Environmental\\_Analysis.pdf](https://planning.lacity.org/odocument/2b972b78-9efa-4bc9-9b38-e6adcb55efc1/VI_Sustainable_Communities_Environmental_Analysis.pdf); Case No. ENV-2018-5594 (Sep. 2019) SCEA, PDF pp. 57-58, <https://planning.lacity.org/eir/sceas/documents/thatcheryard/V.%20SCEA%20Initial%20Study%20Checklist.pdf>; Case No. ENV-2015-4131 (Sep. 2019) MND, PDF p. 63, <https://planning.lacity.org/odocument/f809dc18-39a9-4874-8f39-9b2bcd43a8db/ENV-2015-4131.pdf>; Case No. ENV-2019-7321 (Oct. 2020) MND, PDF p. 51, <https://planning.lacity.org/odocument/001ce94f-037b-42cb-a1c6-a79939b171a6/ENV-2019-7321.pdf>; Case No. ENV-2014-3179 (Mar. 2020) MND, PDF p. 59, <https://planning.lacity.org/odocument/12c43f0f-86dc-4932-b385-4fb33e8a211d/ENV-2014-3179.pdf>; Case No. ENV-2019-1065 (Aug 2019) MND, PDF pp. 33-34, <https://planning.lacity.org/odocument/30b4f3bc-b498-4392-81c4-164f92c94b38/ENV-2019-1065.pdf>; Case No. ENV-2019-0686 (May 2019) MND, PDF p. 41, <https://planning.lacity.org/odocument/1e701bbd-6286-425e-99af-e1bea3861173/ENV-2019-686.pdf> and Appendix B, PDF p. 10, <https://planning.lacity.org/odocument/83cc6338-cd86-43b9-9a6f-b0d4b3178e00/ENV-2019-686-B.pdf>; Case No. ENV-2018-7122 (May 2019) MND, PDF p. 42, <https://planning.lacity.org/odocument/a0a072c7-6a41-4204-b52f-596f704d1e8c/ENV-2018-7112.pdf> and Appendix B, PDF p. 21, <https://planning.lacity.org/odocument/3df9f721-f978-47c2-8bca-0d721c35b3b2/ENV-2018-7112-B.pdf>; Case No. ENV-2017-613 (May 2019) MND, PDF p. 42, <https://planning.lacity.org/odocument/6fbd4854-fd37-4f50-bd30-c813dff9a747/ENV-2017-613.pdf> and Appendix A, PDF pp. 4-5, <https://planning.lacity.org/odocument/aba55507-7fd6-49ff-abb1-4e7045a583a2/ENV-2017-613-A.pdf>; Case No. ENV-2017-713 (Aug. 2019) MND, PDF p. 74, <https://planning.lacity.org/odocument/b50b48c4-d6f8-4a83-9e0d-3a488b26b524/ENV-2017-713.pdf>; Case No. ENV-2019-5436 (Oct. 2019) MND, PDF p. 50, <https://planning.lacity.org/odocument/319eeb30-cc17-455f-b322-8d0eb498fc4c/ENV-2019-5436.pdf>; Case No. ENV-2019-3845 (Oct. 2019) MND, PDF pp. 41-42, <https://planning.lacity.org/odocument/2ad7c32a-9ae9-4ee1-ace0-2c33f991b052/ENV-2019-3845.pdf>; Case No. ENV-2019-4650 (Oct. 2019) MND, PDF pp. 86-87, <https://planning.lacity.org/odocument/70edaa4e-52c0-4bdb-9960-f798e74b9dea/ENV-2019-4650.pdf>; Case No. ENV-2015-4630 (Aug. 2018) DEIR, PDF p. 25, [https://planning.lacity.org/eir/1375\\_St\\_Andrews\\_Apts/DEIR/DEIR%20Sections/IV.F.%20Greenhouse%20Gas%20Emissions%20\(1375%20St%20Andrews\)%20Public%20Review.pdf](https://planning.lacity.org/eir/1375_St_Andrews_Apts/DEIR/DEIR%20Sections/IV.F.%20Greenhouse%20Gas%20Emissions%20(1375%20St%20Andrews)%20Public%20Review.pdf); Case No. ENV-2015-3603 (Jan. 2018) DEIR, PDF p. 53, [https://planning.lacity.org/eir/6200WestSunset/Deir/files/D\\_IVD.pdf](https://planning.lacity.org/eir/6200WestSunset/Deir/files/D_IVD.pdf); Case No. ENV-2015-1853 (Jun. 2016) DEIR, PDF pp. 8, 12, [https://planning.lacity.org/eir/Clarendon/DEIR/files/DEIR/4\\_2%20DEIR%20GHG.pdf](https://planning.lacity.org/eir/Clarendon/DEIR/files/DEIR/4_2%20DEIR%20GHG.pdf); DCP Case No. ENV-2014-3995 (Feb. 2016) DEIR, PDF p. 16, [https://planning.lacity.org/eir/andorasubdivision/DEIR/DEIR/12\\_IV.F\\_GHG.pdf](https://planning.lacity.org/eir/andorasubdivision/DEIR/DEIR/12_IV.F_GHG.pdf).

<sup>23</sup> See e.g., DCP Case No. ENV-2016-1951 (Apr. 2018) DEIR, PDF pp. 40, 53-54, [https://planning.lacity.org/eir/Fig\\_and\\_8th/DEIR/files/D\\_IVC.pdf](https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/D_IVC.pdf) & GHG Appendix, PDF pp. 18-20, [https://planning.lacity.org/eir/Fig\\_and\\_8th/DEIR/files/App\\_C.pdf](https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/App_C.pdf); DCP Case No. ENV-2016-3909 (Apr. 2018), DEIR, PDF pp. 38-40, 75, [https://planning.lacity.org/eir/Promenade\\_2035/DEIR/files/D\\_IVD.pdf](https://planning.lacity.org/eir/Promenade_2035/DEIR/files/D_IVD.pdf); DCP Case No. ENV-2015-244 (Oct. 2016) DEIR, PDF p. 139, [https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20Sections/DEIR%20SunWest\\_Sections%20Compiled.pdf](https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20Sections/DEIR%20SunWest_Sections%20Compiled.pdf); DCP Case No. ENV-2016-3177 (Feb. 2020) DEIR, PDF pp. 45-46, [https://planning.lacity.org/eir/Hollywood\\_and\\_Wilcox/deir/files/D.IV.E.pdf](https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/D.IV.E.pdf) and Appendix C, PDF pp. 62-65, [https://planning.lacity.org/eir/Hollywood\\_and\\_Wilcox/deir/files/Appendix\\_C.pdf](https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/Appendix_C.pdf); DCP Case No. ENV-2014-1362 (Jul. 2016) DEIR, PDF pp. 52-53, [https://planning.lacity.org/eir/ICONshermanOaks/DEIR/files/D\\_IVC.pdf](https://planning.lacity.org/eir/ICONshermanOaks/DEIR/files/D_IVC.pdf); DCP Case No. ENV-2016-3576 (Sep. 2017) DEIR, PDF p. 23, <https://planning.lacity.org/eir/668SoAlamedaStreet/Deir/4.5%20Greenhouse%20Gas%20Emissions.pdf>; DCP Case No. ENV-2016-4889 (Jun. 2018) DEIR, PDF pp. 53-53, [https://planning.lacity.org/eir/1001\\_Olympic/deir/DEIR%20Sections/IV.F%20GHG.pdf](https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Sections/IV.F%20GHG.pdf) and Appendix E, PDF pp. 220-221, [https://planning.lacity.org/eir/1001\\_Olympic/deir/DEIR%20Appendices/E-1%20-%20AQ%20and%20GHG%20](https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Appendices/E-1%20-%20AQ%20and%20GHG%20)

In fact, the Project exceeds SCAQMD’s multi-tier GHG thresholds. The Project is not CEQA exempt (Tier 1), and there is no applicable CAP (Tier 2). As compared to the Site’s baseline emissions (i.e., 2,045 MTCO<sub>2</sub>e/yr), the Project is estimated to generate 9,264 MTCO<sub>2</sub>e/yr (i.e., 7,216 MTCO<sub>2</sub>e/yr net emissions)—which far exceeds SCAQMD’s Tier 3 screening thresholds (i.e., 1,400 and 3,000 MTCO<sub>2</sub>e/yr for commercial and non-industrial projects, respectively). (See DEIR, p. 4.6-65.) Given the 7,216 MTCO<sub>2</sub>e/yr generated by the Project’s 2,144 employees (i.e., 3.36 MTCO<sub>2</sub>e/yr/sp), the Project also exceeds SCAQMD’s Tier 4 performance standard (i.e., 3.0 MTCO<sub>2</sub>e/yr/sp for year 2035). (Id.; see also DEIR, APP-B, PDF p. 403.) Hence, the City should find a significant GHG impact requiring additional mitigation measures and perhaps offset credits (Tier 5).

10-14

Under the circumstances, SCAQMD’s Tier 3 and Tier 4 thresholds are most consistent with evolving standards applied by other air districts and agencies. Notwithstanding being proposed prior to the State’s adoption of more aggressive GHG reduction goals of 40 percent 1990 levels by 2030 (i.e., SB 32), SCAQMD’s Tier 3 screening thresholds and Tier 4 efficiency standards are akin to and most consistent with bright-line/efficiency thresholds adopted by numerous other air districts in recent years, including Sacramento Metropolitan AQMD,<sup>24</sup> Bay Area AQMD,<sup>25</sup> Placer County APCD,<sup>26</sup> and San Luis Obispo County APCD.<sup>27</sup> Similarly, the Association of Environmental

[Modeling.pdf](#); DCP Case No. ENV-2016-4313 (Dec. 2016) MND, PDF pp. 136-137, [http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1\\_misc\\_7\\_02-22-2017.pdf](http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1_misc_7_02-22-2017.pdf); DCP Case No. ENV-2016-4394) MND, PDF pp. 164-165, <https://planning.lacity.org/odocument/42685ced-64ab-4c78-9f70-f5f63f805823/ENV-2016-4394.pdf>; DCP Case No. ENV-2008-1421 (Oct. 2015) Addendum to Certified EIR, PDF pp. 28-31, [http://clkrep.lacity.org/onlinedocs/2016/16-0033\\_misc\\_1\\_01-08-2016.0001.pdf](http://clkrep.lacity.org/onlinedocs/2016/16-0033_misc_1_01-08-2016.0001.pdf); DCP Case No. ENV-2008-1773 (Sep. 2015) DEIR, PDF pp. 23-25, <http://planning.lacity.org/eir/theReef/deir/DEIR%20Sections/IV.G.%20Greenhouse%20Gases.pdf>; DCP Case No. ENV-2013-194 (Feb. 2014) DEIR, PDF pp. 17-19, [https://planning.lacity.org/eir/MuseumSquare/DEIR/DEIR%20Sections/IV.E.%20Greenhouse%20Gases\\_Global%20Climate%20Change.pdf](https://planning.lacity.org/eir/MuseumSquare/DEIR/DEIR%20Sections/IV.E.%20Greenhouse%20Gases_Global%20Climate%20Change.pdf).

<sup>24</sup> SMAQMD (May 2018) Guide to Air Quality Assessment in Sacramento County, pp. 6:1-3, 6:10-12 (“(GHG) emissions adversely affect the environment through contributing, on a cumulative basis, to global climate change ... the District recommends that lead agencies address the impacts of climate change on a proposed project and its ability to adapt to these changes in CEQA documents ... [thus urging] evaluating whether the GHG emissions associated with a proposed project will be responsible for making a cumulatively considerable contribution to global climate change.”[emphasis original]), <http://www.airquality.org/LandUseTransportation/Documents/Ch6GHGFinal5-2018.pdf>; see also SMAQMD Thresholds of Significance Table, <http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf>.

<sup>25</sup> BAAQMD (May 2017) CEQA Air Quality Guidelines, p. 2:1-4 (“No single project could generate enough GHG emissions to noticeably change the global average temperature [but rather] [t]he combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts.”), [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en).

<sup>26</sup> PCAPCD (Oct. 2016) CEQA thresholds of Significance Justification Report, pp. E-2, 2, 17-22 (“CEQA requires that the lead agency review not only a project’s direct effects on the environment, but also the cumulative impacts of a project and other projects causing related impacts. When the incremental effect of a project is cumulatively considerable, the lead agency must discuss the cumulative impacts in an EIR. [citing CEQA Guidelines § 15064]”), <https://www.placer.ca.gov/DocumentCenter/View/2061/Threshold-Justification-Report-PDF>; see also PCAPCD (11/21/17) CEQA Thresholds And Review Principles, <http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples>.

<sup>27</sup> SLOAPCD (Mar. 28, 2012) GHG Threshold and Supporting Evidence, pp. 5, 25-30, 42 (“No single land use project could generate enough GHG emissions to noticeably change the global average temperature. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical

Professionals (“AEP”) has proposed a 2030 land-use efficiency threshold of 2.6 MTCO<sub>2</sub>e/yr/sp.<sup>28</sup> Here, the DEIR fails to adequately justify its qualitative GHG analysis as staying in step with evolving scientific knowledge and state regulatory schemes. (See *Cleveland II*, 3 Cal.5th at 504, 519 [quoting CEQA Guidelines § 15064(b)].)

↑  
10-14  
(cont.)

**4. Failure To Consider Project-Level Mitigation Measures**

The above analysis constitutes substantial evidence that the Project will have significant GHG emissions warranting further mitigation. The City should consider project-specific mitigation measures and strategies urged by CARB, SCAG, the California Air Pollution Control Officer Association (“CAPCOA”) <sup>29</sup> —such as those listed in CARB’s 2017 Scoping Plan provided below:

**B. Examples of potentially feasible mitigation measures that could be considered for individual projects under CEQA when the local jurisdiction is the lead agency.**

**Construction**

- Enforce idling time restrictions for construction vehicles
- Require construction vehicles to operate with the highest tier engines commercially available
- Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible
- Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance
- Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators
- Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available
- Require diesel equipment fleets to be lower emitting than any current emission standard

10-15

**Operation**

- Comply with lead agency’s standards for mitigating transportation impacts under SB 743
- Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals

///

methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions.), <https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Greenhouse%20Gas%20Thresholds%20and%20Supporting%20Evidence%204-2-2012.pdf>.

<sup>28</sup> AEP (Oct. 2016) Beyond Newhall and 2020, pp. 25, 34, 40 40, [https://califaep.org/docs/AEP-2016\\_Final\\_White\\_Paper.pdf](https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf).

<sup>29</sup> 2017 Scoping Plan, Appendix B-Local Action, p. 7-9, [https://www.arb.ca.gov/cc/scopingplan/app\\_b\\_local\\_action\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf); SCAG (Dec. 2019) Final Program EIR, pp. 2.0-18 – 2.0-71 (see “project-level mitigation measures” for air quality, GHG, and transportation impacts), [https://scag.ca.gov/sites/main/files/file-attachments/fpeir\\_connectsocial\\_complete.pdf?1607981618](https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_complete.pdf?1607981618); CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, [https://www.airquality.org/ClimateChange/Documents/Final%20Handbook\\_AB434.pdf](https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf).

**Operation (continued)**

- Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate<sup>1</sup>
- Dedicate on-site parking for shared vehicles
- Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects
- Provide on- and off-site safety improvements for bike, pedestrian, and transit connections, and/or implement relevant improvements identified in an applicable bicycle and/or pedestrian master plan
- Require on-site renewable energy generation
- Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size developments
- Require cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing
- Require solar-ready roofs
- Require organic collection in new developments
- Require low-water landscaping in new developments. Require water efficient landscape maintenance to conserve water and reduce landscape waste.
- Achieve Zero Net Energy performance targets prior to dates required by CALGreen
- Require new construction, including municipal building construction, to achieve third-party green building certifications, such as the GreenPoint Rated program or the LEED rating system
- Require the design of bike lanes to connect to the regional bicycle network
- Expand urban forestry and green infrastructure in new land development
- Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use
- Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT
- Develop a rideshare program targeting commuters to major employment centers
- Require the design of bus stops/shelters/express lanes in new developments to promote the usage of mass-transit
- Require gas outlets in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available
- Require the installation of electrical outlets on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment
- Require the design of the electric boxes in new residential unit garages to promote electric vehicle usage
- Require electric vehicle charging station (Conductive/inductive) and signage for non-residential developments
- Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands



10-15  
(cont.)

<sup>1</sup> This is not to be confused with the Americans with Disabilities Act (ADA) requirements or other minimum parking requirements for dedicating space to clean air vehicles and/or EV charging infrastructure.

**III. CONCLUSION**

In sum, Local 11 respectfully urges the City not to grant the Project Approvals until the abovementioned issues are addressed in a CEQA-compliant EIR that includes additional mitigation measures that reduce Project impacts on energy, land use, and GHGs.



10-16

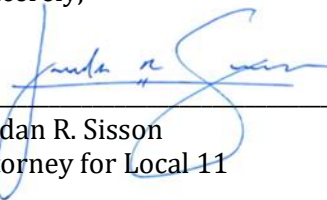


Local 11 reserves the right to supplement this appeal justification at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under State or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092.) Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11<sup>th</sup> Floor, LA, CA 90017 (jordan@gideonlaw.net).

↑  
10-16  
(cont.)

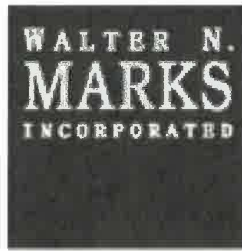
Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,



---

Jordan R. Sisson  
Attorney for Local 11



Helms Hall of Fame  
8758 Venice Boulevard  
Los Angeles, CA 90034  
Telephone: 310.204.1865  
Facsimile: 310.836.2208  
wally@wnmrealty.com

Walter N. Marks (1903-1997)  
Founder  
Walter N. Marks, Jr. (1930-2009)  
Walter N. Marks III

REALTORS

Tuesday, September 6, 2022

Via Email: [jeff.anderson@culvercity.org](mailto:jeff.anderson@culvercity.org)

Jeff Anderson, Contract Planner  
CITY OF CULVER CITY  
PLANNING DIVISION  
9770 Culver Boulevard, Culver City, CA 90232

Re: Crossings Campus Draft EIR (“Project”)  
City of Culver City Project Record Number: P2021-0272-CP/ZCMA/EIR  
City of Los Angeles Case Numbers: CPC-2021-9506-CPIO-SP-SPR-WDI;  
ENV-2021-9507-EIR

Dear Mr. Anderson,

Please accept this letter as our written comment to the DEIR related to the Project noted above. As the property owner of the Helms Bakery campus, immediately adjacent to the subject site, we are addressing several impacts herein.

11-1

Please note that the City of Culver City has designated its portion of the Helms Bakery campus has a historic resource. As such, our ability to make modifications today, and in the future, to the physical plant, ensuring the operation of our campus, is limited.

11-2

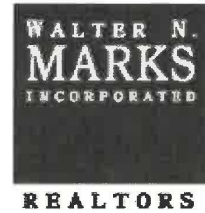
We **support** the Project as described in the DEIR. We **do not support** Alternative 2 (Zoning Compliant), nor Alternative 3 (Reduced), and most importantly **do not support** Alternative 4 (Access Alternative).

11-3

Alternative 4, if implemented, would severely impact to the operations of our campus. Our private alley, between Venice Boulevard and Washington Boulevard, is a bi-directional means for ingress and egress serving for all types of vehicles, including daily trash haulers, furniture delivery trucks of all sizes, including 55 foot trailers, employees and our patrons. Moreover, our private alley is also a life safety exit path for our patrons on foot.

11-4

We do not support the removal of office-related vehicular access from Washington Boulevard, Alternative 4, serving the Project. Strangely, the DEIR does not mention if our ingress and egress to our property would be restricted as well. We must ensure the ability to continuously use our private alley is not compromised and that the new Project Access Alley does not create hazardous traffic conditions, especially at the signalized intersection of Washington Boulevard and Wesley Street.



The access to this Project, bounded on three sides by three significant boulevards, needs to be shared equally. If Washington Boulevard access was restricted, and the vehicular loads are shifted to the Venice Boulevard as the dominant access point, as noted above, our ability to continuously use our private alley would be compromised and that the new Project Access Alley would create hazardous and confusing traffic conditions.

↑  
11-4  
(cont.)

The introduction of the signal on Venice Boulevard, Alternative 4, not only skews the distribution and intersection volumes, but introduces impacts. The potential for cut-through traffic from Ivy Street in Los Angeles, north of Venice Boulevard, is real. The creation of hazardous conditions between in-coming vehicles to our campus and exiting vehicles from the Project are concerning. Moreover, the traffic volumes along Venice Boulevard are returning to the 2019 levels and as such, during peak traffic hours, we foresee queues exiting the Project with nowhere to merge into a clogged westbound Venice Boulevard.

↑  
11-5

See the attached photos taken today depicting morning traffic volumes as vehicles are backed up beyond the signalized intersection at Helms Avenue, east of the Project.

↑  
11-6

It is unclear if the Project considered the City of Los Angeles’s “Venice Boulevard Safety and Mobility” project (<https://ladotlivablestreets.org/projects/venice>). This plan will create a new, dedicated bus lane along Venice Boulevard, west of National Boulevard, west of the Project. Thus, westbound Venice traffic will lose a vehicle lane, known to the lay as a bottleneck. This situation will result in an increase in vehicular backup along Venice Boulevard, east of the Project and east of Helms Bakery. This condition conflicts with, and exacerbates, the goals of any introduction of a signal at the Project Access Alley.

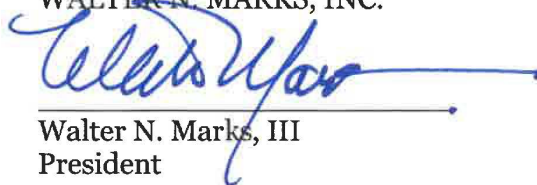
↑  
11-7

This letter, as well as our letter dated, December 17, 2021, brings to light the City’s need to further study all access related impacts realized by this Project. Thank you.

↑  
11-8

Very truly yours,

WALTER N. MARKS, INC.

  
Walter N. Marks, III  
President





## Public Meeting Comments

1.	Thank you, everybody. I just want to say thank you to the project team for the studying and it's apparent advancement of the possibility for mobility or transportation alternative number one, utilizing the new traffic signal up on Venice. It really is something that is very important to the residences of Culver City and the Arts District that the vehicles come in off of Venice and just want to you know, for the record, you know, thank you guys and very much support both transportation alternative number one and, should there be any opportunity to meet with DOT, which sounds like it's might be the last hurdle within getting that fully implemented into the project, I'm happy to meet and share some perspective with the team, thank you.	Ken Mand	<a href="mailto:kenmand@gmail.com">kenmand@gmail.com</a>	PMC-1
2.	Thank you so much, I would like to just comment that right now we are on reduced transportation lanes on Washington Boulevard going east and west at that juncture. I'm curious will there be a light at that little alley for the ingress and I encourage there to be also traffic light at Venice on the opposite side and that all of the major trucks delivering supplies and construction, you know opportunities, would be incoming from Venice and not on Washington. We have a tremendous amount of back traffic and a big traffic jam there already. Thank you.	Jillian Gotlib	<a href="mailto:Jillian.windfall@gmail.com">Jillian.windfall@gmail.com</a>	PMC-2
3.	I just wanted to voice my support for transportation alternative number one, and thank you Apple for being flexible on this and developers. So that's it. Thank you.	Michael Monagan	<a href="mailto:michael@monagan.com">michael@monagan.com</a>	PMC-3
4.	Thank you very much for the report. Clearly, one of the major issues is going to be construction traffic in the short term, and I understand you're going to have a construction management plan supposedly to deal or mitigate these issues. Will we be given the opportunity to review and comment on that construction management plan? Well, that that's my comment, I think that that there are some important businesses on Washington Boulevard that can be severely impacted relative to construction and we'd like the opportunity to review and comment on it. Thank you.	Steve Webb	<a href="mailto:swebb@twkglaw.com">swebb@twkglaw.com</a>	PMC-4
5.	I appreciate Apple by investing in our neighborhood and I am in support of transportation option number one that prioritizes Venice Boulevard as the entre ingress and out. That's my comment. Thank you.	Kenji Haroutunian	<a href="mailto:Kenjihar@gmail.com">Kenjihar@gmail.com</a>	PMC-5

## Public Meeting Comments

6.	Hi, I just wanted to reiterate what's already been said. Apple, thank you so much for your consideration of our neighborhood it really means a lot to us that you're being so open minded to our requests. I want to reiterate my support for the proposal to have the ingress and egress on Venice Boulevard and also reiterate again that, if we could mitigate the traffic, so that is focused on Venice and alleviate the pressure that's already existing on a neighborhood on Washington Boulevard we'd be so very grateful Thank you so much for your time.	Stacey Hardkey	<a href="mailto:Staceyhardke@gmail.com">Staceyhardke@gmail.com</a>
----	---	----------------	--

PMC-6