

5700 HANNUM MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Final Environmental Impact Report
State Clearinghouse No. 2023080709

Prepared for
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

June 2024

Culver City Case Nos:
P2023-0218-CP; -DOBI; -ZCMA; -GPMA; -EIR



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TABLE OF CONTENTS

Final Environmental Impact Report

	<u>Page</u>
Chapter 1. Introduction.....	1-1
1.1 Purpose of the Final EIR.....	1-1
1.2 Project Summary	1-1
1.3 Overview of the CEQA Public Review Process for the Draft EIR	1-2
1.3.1 Initial Study/Notice of Preparation	1-2
1.3.2 Draft Environmental Impact Report	1-3
1.4 Organization of the Final EIR.....	1-4
Chapter 2. Comments and Responses.....	2-1
2.1 Responses to Comments	2-4
2.1.1 Draft EIR Meeting.....	2-4
2.1.2 Agency Comments	2-13
2.1.3 Individual Comments.....	2-28
Chapter 3. Revisions, Clarifications, and Corrections to the Draft EIR.....	3-1
Chapter 4. Mitigation Monitoring Program	4-1

List of Tables

Table 2-1 Summary of Comments on the Draft EIR	2-2
Table 4-1 Mitigation Monitoring Program	4-2

Appendices

Appendix A: Original Comment Letters on the Draft EIR

Appendix B: Draft EIR Public Meeting Materials

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CHAPTER 1

Introduction

1.1 Purpose of the Final EIR

The City of Culver City (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed 5700 Hannum Avenue Mixed-Use Residential and Commercial Project (Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprise the Final EIR.

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

1.2 Project Summary

As further described in Chapter 2, *Project Description*, of the Draft EIR, 5700 Hannum Owner, LLC c/o Lincoln Property Company, the Applicant, proposes to develop a mixed-use residential and commercial project on an approximately 2.23-acre (97,264 square feet [sf]) site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing 30,672 square foot, two-story office building in the northern portion of the Project Site and associated surface parking. The Project would develop a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 7,507 square feet of publicly accessible open space, 19,526 square feet of private open space and 27,123 square feet of common open space (for residents) for a total of 54,156 square feet of open space. The building would be constructed atop two levels of semi-subterranean vehicular parking, with parking also provided on the first floor of the building. The Project would include a total of 428 vehicular parking spaces (399 residential, 6 guest and 23 commercial) within three parking levels. Two points of vehicular access would be provided to the Project Site, including a residential only driveway along Buckingham Parkway and a commercial and residential driveway along Hannum Avenue. The Project would also provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with Culver City Municipal Code (CCMC)

requirements. The Project would also include private and publicly accessible open space. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue. Common open space available to residents only would include a centrally located courtyard, a community room on the second floor; a gym, an amenity deck, and a community room on the sixth floor.

The Project is proposing to change the Project Site’s zoning designation from Commercial Regional Business Park to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. To achieve the Project’s proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site from Regional Center to General Corridor. The Project is also requesting Density and Other Bonus Incentives (DOBI) to allow for Increased Density with affordable units incorporated into the Project; and approval for Extended Hours of Construction (CCMC Section 9.07.035.C.1). In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, haul route and engineering permits.

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

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

1.3.1 Initial Study/Notice of Preparation

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

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 30-day review period commencing August 29, 2023 and ending September 29, 2023. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A of the Draft EIR for a copy of the NOP.

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments,

and receive feedback in association with the entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the EIR Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The virtual Community Meeting and EIR Scoping Meeting was held on September 12, 2023, at 7:00 P.M. The EIR Scoping Meeting was held in an online format using zoom and provided interested individuals, groups, and public agencies the opportunity to view materials and ask questions regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials from the EIR Scoping Meeting are provided in Appendix A-3 of the Draft EIR

During the public review period for the NOP, 10 commenters submitted responses to the NOP. Correspondence was received from the California Air Resources Board's (CARB), California Department of Transportation (Caltrans), County of Los Angeles Department of Public Works, the Native American Heritage Commission (NAHC), interested organizations, and interested parties. All written comments are provided in Appendix A-4, of the Draft EIR.

1.3.2 Draft Environmental Impact Report

In accordance with the provision of CEQA Guidelines Sections 15085(a) and 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library, Baldwin Hills Branch Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website at: <https://www.culvercity.org/Active-Projects/5700-Hannum-Ave-Proposed-Project>; (5) sent a NOA to all property owners within 500 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on April 4, 2024 and ended on May 20, 2024 for a total of 47 days.

During the Draft EIR public review period, the City Planning Division received 16 comment letters on the Draft EIR from agencies and individuals through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters, of this Final EIR. Also during the Draft EIR public review period, the City conducted a Public Meeting focused on the Draft EIR on April 30, 2024. This Public Meeting was not required by the CEQA Guidelines, but rather conducted by the City to provide an additional opportunity for public input. The Public Meeting on the Draft EIR provided an overview of the findings in the Draft EIR, explained the process for providing comments on the document, and outlined the remaining process for completion of a Final EIR. Copies of the materials provided at the Public Meeting on the Draft EIR are included in Appendix B of this Final EIR. All written comments received during the public review period and also during the Public Meeting on the Draft EIR are presented, and responses are provided in Chapter 2, *Comments and Responses*, of this Final EIR.

1.4 Organization of the Final EIR

The Final EIR consists of the following four chapters:

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

Chapter 2, Comments and Responses. This chapter presents all comments received by the City during the 47-day public review period of the Draft EIR (April 4, 2024 to May 20, 2024) and during the virtual Public Meeting held on April 20, 2024 as well as the responses to those comments. A total of 16 comment letters were received during the public comment period.

Chapter 3, Revisions, Clarifications and Corrections to the Draft EIR. This chapter indicates that based on the comments received on the Draft EIR, no revisions, clarifications or corrections to the Draft EIR are required.

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

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

- Appendix A: Original Comment Letters on the Draft EIR
- Appendix B: Draft EIR Public Meeting Materials

CHAPTER 2

Comments and Responses

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

Section 2.1, Responses to Individual Comments, presents comments submitted during the 47-day public review comment period for the Draft EIR from State agencies, as well as from individuals as listed on Table 2-1. Each letter is assigned a number and arranged by Draft EIR Meeting, agency, and then by individuals and other interested parties in chronological order, as indicated in Table 2-1. Note as discussed in Chapter 1, *Introduction*, of this Final EIR, the City held a Public Meeting on the Draft EIR on April 20, 2024, during which oral comments were received. These comments are addressed below within Section 2.1.1, Draft EIR Meeting.

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

As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on “the disposition of significant environmental issues raised.” Therefore, detailed responses are not provided for comments that do not relate to environmental issues. Accordingly, comments from the Draft EIR meeting that are not applicable to the Draft EIR or that do not relate to the environmental issues analyzed in the Draft EIR, are not included herein

**TABLE 2-1
SUMMARY OF COMMENTS ON THE DRAFT EIR**

Letter No.	Name	Date Received	Environmental Topic								
			Aesthetics (Height/ Massing)	Air Quality/ GHG	Breezes	Tree Removal	Hazardous Materials	Traffic Parking	Utility Infrastructure	Cumulative Impacts	Other
Draft EIR Meeting											
DEIR 1	Yumi Montrau	4/20/24	X		X				X	X	
DEIR 2	Hilton Creve	4/20/24							X		
DEIR 3	Judi Sherman	4/20/24								X	
DEIR 4	Jim MacDonald	4/20/24		X					X		
DEIR 5	Deb Wallace	4/20/24		X							X
DEIR 6	Tom O'Neil	4/20/24	X		X	X					
DEIR 7	Sharon Levnine	4/20/24	X		X	X					
Agency											
AG 1	California Department of Transportation (Caltrans), District 7 Miya Edmonson, LDR/CEQA Branch Chief 100 S. Main Street, MS 16 Los Angeles, CA 90012	5/16/2024							X		
AG 2	Los Angeles Metropolitan Transportation Authority Cassie Truong, Senior Transportation Planner One Gateway Plaza Los Angeles, CA 90012-2952	5/17/2024							X		
AG 3	California Air Resources Board Annalisa Scilla, Ph.D, Assistant Division Chief 1001 I Street, P.O. Box 2815 Sacramento, CA 94812	5/20/2024		X						X	

**TABLE 2-1
SUMMARY OF COMMENTS ON THE DRAFT EIR**

Letter No.	Name	Date Received	Environmental Topic								
			Aesthetics (Height/Massing)	Air Quality/GHG	Breezes	Tree Removal	Hazardous Materials	Traffic Parking	Utility Infrastructure	Cumulative Impacts	Other
Individuals											
IND 1	Karyn Marks	5/20/24		X				X		X	
IND 2	Jeff Haas	5/20/24								X	
IND 3	Judi Sherman	5/20/24			X					X	
IND 4	Thomas O/Neil	5/20/24									X
IND 5	Angelika Kischnick	5/20/24						X	X	X	
IND 6	Justin Ciampaglia	5/20/24 & 5/21/24		X	X			X		X	X
IND 7 (A-F) Form Letter	Tanya Ihnen (IND 7A) Yumi Mandt-Rauch (IND 7B) Eurana High (IND 7C) Irene French (IND 7D) Gabriel Parhoti (IND 7E) Received May 20, 2024 (IND 7F)	5/20/24	X		X					X	X

SOURCE: ESA, 2024

2.1 Responses to Comments

Responses to individual comments are included on the following pages.

2.1.1 Draft EIR Meeting

The comments below are summarized from the Draft EIR public meeting that occurred on April 20, 2024. As indicated above, the focus of the responses to comments is on significant environmental issues raised in the Draft EIR. Thus, detailed responses are not provided for comments that do not relate to environmental issues. Accordingly, comments from the Draft EIR meeting that are not applicable to the Draft EIR or that do not relate to the environmental issues analyzed in the Draft EIR, are not included herein

Commenter 1 - Yumi Montrau

Comment DEIR 1-1

The commenter raised concerns about the size and height of the buildings affecting ocean breezes in the area, and asserted that there is not infrastructure capacity to put in air conditioning units. The commenter inquired about whether the height was consistent with current City codes. The commenter noted that construction is generally occurring to the west.

Response to Comment DEIR 1-1

This comment raises concerns regarding the height of building affecting ocean breezes and the ability of the existing infrastructure to accommodate air conditioning units in the Fox Hills area.

First, with regard to (ocean) breezes, the Draft EIR applies the thresholds of significance contained in Appendix G of the CEQA Guidelines. Appendix G does not provide a threshold pertinent to ocean breezes and as such, there is no requirement for the Draft EIR to evaluate this topic. However, for informational purposes, a review of wind rose maps from the Wind National Oceanic and Atmospheric Administration for the Santa Monica Airport and Los Angeles International Airport , show that wind patterns during the warmer summer months (July to September – when air conditioning would likely be utilized) primarily hail from a southwesterly direction in the coastal region of Los Angeles, while it is acknowledged that a minor percentage of the wind comes directly from the west. With that said, in the immediate vicinity of the Project Site, Buckingham Parking meanders in a southwesterly to northeasterly manner, which would allow the majority of the winds hailing from southwest to pass through the area without significant obstruction to residential uses located on the east side of Buckingham Parkway. Regardless, as this is not considered an impact under CEQA, no further response is necessary on this topic.

With regard to utility infrastructure impacts, the Project evaluated its effects on electrical and natural gas infrastructure in Section 4.13.2, *Utilities and Services Systems - Electric Power, Natural Gas, and Telecommunications Facilities*. In addition, Section, 4.13.2, *Utilities and Services Systems – Water Supply*, evaluated impacts to the water purveyor and water infrastructure serving the Project area. As evaluated therein, the Project would be able to be served by existing utility providers and development of the Project and the related projects (cumulative impacts) is not

anticipated to adversely affect the electric power or water facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. There is no substantial evidence provided by the comment that the Project would affect breezes in the area. Regardless, it would be speculative to assume a significant number of new air conditioning units would be purchased and operated in the immediate vicinity such that the existing infrastructure would be affected. Since there is no evidence that this circumstance would occur, any analysis of potential infrastructure impacts to the surrounding area would be speculation which is not required by CEQA (CEQA Guidelines Section 15145).

With regard to the Project's building heights, as discussed in Chapter 2, Project Description, of the Draft EIR, the Project would develop a new 6-story (up to a height 78-feet) mixed-use building. As discussed on page 2-21 of the Draft EIR, per Culver City Municipal Code (CCMC) Section 17.400.065 Table 4-2, the maximum allowable height for the Project is 56 feet. However, the Project is proposing to include 27 units (12 percent of base density) of its residential units as Very Low Income affordable units. By doing so, consistent with the CCMC and State Density Bonus Law (Gov't Code §65915), the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a height of up to 78 feet due to the existing site topography. However, note that there is a grade change from the northern end of Buckingham Parkway down to the southern end of Buckingham Parkway adjacent to the Site. Thus, the maximum allowable building heights would only occur on the southern extent of Buckingham Parkway as viewed from this roadway. Elevations for the Project are provided in Figures 2-2-14 to 2-16 of the Draft EIR.

With this height increase, no significant physical impact to the environment would occur. As discussed in Section 4.1, *Aesthetics*, of the Draft EIR, aesthetics impacts would be less than significant. That is, as evaluated therein, the Project with a maximum building height of 78 feet would not conflict with applicable zoning and other regulations governing scenic quality. Furthermore, as discussed in the Project's Initial Study, included in Appendix A of the Draft EIR, based on the aesthetics thresholds under CEQA and utilized by the City, the Project would not have a substantial adverse effect on a scenic vista, nor would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. As such, aesthetics impacts would be less than significant.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 1-2

The commenter expressed concerns that future site occupants and visitors may not park on-site, but rather off-site depending how they are charged. The commenter also inquired about whether parking would be provided in accordance with City requirements.

Response to Comment DEIR 1-2

This comment raises concerns about parking and the potential for off-site parking to occur. First, parking is not an impact under CEQA. Thus, the Draft EIR appropriately does not analyze impacts associated with this topic. Nonetheless, with regard to parking requirements, in October 2022, the City Council passed a motion that eliminated minimum parking requirements citywide. As a result, no minimum parking is required to be constructed by the Project per CCMC requirements. Nonetheless, the Project's provided parking is anticipated to accommodate all resident, employees and guests in consideration of the Project's Transportation Demand Management (TDM) Program, which is discussed on pages 4.11-19 to 4.11-21 in Section 4.11, Transportation, of the Draft EIR. The Project will provide a supply of 428 vehicle parking spaces (399 residential, 5 guest, and 24 commercial), which assumes 1 space per studio and 1-bedroom unit and 2 spaces for 2-bedroom (or more) units. Beginning in 2025, all new multi-family projects, including the Project, will be required to have unbundled parking, meaning that residents would rent the parking stalls separate from the residential units.¹ Thus, the Project would comply with State law. The Project's TDM Program, identified as Project Design Feature TRAF-PDF-2, consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a Project's TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management.

Comment DEIR 1-3

The commenter also inquired about bike lanes and whether the potential for new bike lanes were considered in the analysis.

Response to Comment DEIR 1-4

This comment asks about the Project's potential conflict with existing or planned bicycle facilities, and whether such facilities were considered in the Transportation Assessment. The existing eastbound Class II Bike lane on Hannum Avenue would be maintained by the Project. Also, while no existing bicycle lanes are provided on Buckingham Parkway, the Culver City Bicycle & Pedestrian Action Plan calls for a Class IV bike lane to be installed. The design for this bicycle lane has not been finalized. However, the Project's Buckingham Driveway assumes construction of this planned bicycle lane understanding it would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway and loading area. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. The Buckingham Driveway would be restricted to residential access only. Both the existing bicycle lane on Hannum Avenue and the planned bicycle lane on Buckingham Parkway were considered in the Project's Transportation Assessment. As discussed on pages 4.11-21 to 4.11-26 of the Draft EIR, the Project would not

¹ California Assembly Bill 1317, Unbundled Parking. Passed on October 11, 2023.

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

Commenter 2 - Hilton Creve

Comment DEIR 2-1

The commenter raised concerns about parking, and specifically street parking, stating that the streets are typically crowded, especially on street cleaning days.

Response to Comment DEIR 2-1

This comment raises concerns about the Project's ability to provide adequate parking and asserts that the street parking in the area is a concern. Refer to Response to Comment DEIR 1-2 which addresses concerns related to parking for the Project.

Commenter 3 - Judy Sherman

Comment DEIR 3-1

The commenter expressed concerns about cumulative impacts occurring from two mixed-use projects in the local vicinity, which she asserts collectively will include 1,705 units.

Response to Comment DEIR 3-1

The commenter expressed concerns about cumulative impacts occurring from two (2) mixed-use projects in the local vicinity, which the commenter asserts collectively with the Project will include approximately 1,700 residential units. The commenter notes that these two projects, located at 5757 Uplander Way and 5730 Uplander Way, were not included in the list of related projects within Table 3-1, Related Projects List, in Chapter 3, Environmental Setting, of the Draft EIR.

The commenter correctly indicates that these two projects were not included in the related projects list. However, consistent with CEQA requirements, the related projects list was established at the time of issuance of the Project's Notice of Preparation (NOP) in August 2023, which informed the public that the City prepared an Initial Study and was at the onset of preparing an EIR for the Project. The list was also confirmed at the time of the Memorandum of Understanding (MOU) was issued for the Project's Transportation Assessment in June 2023, which set forth the evaluation criteria and list of projects to be included in the future (non-CEQA) traffic conditions assessment. At the latter August 2023 NOP date, these two (2) projects were not known or foreseeable projects by the City.

The list of related projects is assembled at the MOU and NOP stages from City of Culver City, City of Los Angeles, and County of Los Angeles records at the Departments of Planning and Transportation and includes all known projects that have been built but not yet opened, approved projects under construction, projects that have been approved but where construction had not yet commenced, and projects with a complete application submitted to either City or the County. It is not uncommon for a new project to be proposed while the Draft EIR analysis for any given project is in process. In fact, it is assumed that additional new projects will occur as part of anticipated future development in a given area. To accommodate for this circumstance, traffic growth for

unknown projects is accounted for in traffic impact analyses through background traffic growth rate assumptions as is the case for the two projects listed by the commenter.

In addition to traffic from unknown related projects, additional future traffic growth is added to future base conditions by including a background traffic growth rate to account for land use growth outside of the study area whose traffic may use study area streets and for any related projects not included in the analyzed list.

In the case of the analysis for the 5700 Hannum project, the background growth rate assumed was 1% per year for both the Opening Year and the Future Year forecasts. That growth rate is approximately double the actual growth rate experienced on the area streets in the past decade, so it is conservative enough to account for any new related projects in the area. In addition, the historic growth rate includes all the growth generated by related projects in the area, so the traffic growth assumed in the 1% background traffic growth rate actually “double counts” the traffic generated by the 12 related projects in the Draft EIR’s related project list thus making it even more conservative.

For the above reasons, the Draft EIR’s assessment of cumulative impacts, including its list of related projects, was adequately prepared in accordance with applicable CEQA requirements set forth in CEQA Guidelines Section 15130.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 4 - Jim MacDonald

Comment DEIR 4-1

The commenter expressed concerns about climate change, stating that we need to get rid of as much gas as possible and go electrical. The commenter inquired about the Project’s use of solar panels.

Response to Comment DEIR 4-1

The comment expresses concerns regarding climate change. The Draft EIR addressed greenhouse gas emissions (GHG) impacts in Section 4.6, *Greenhouse Gas Emissions*, with supporting data provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations, of the Draft EIR. As analyzed therein, the Project would have less than significant impacts related to GHG emissions and potential for conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs. GHG impacts would be less than significant.

The commenter also asserts his support for electric power, as opposed to natural gas, and asks about the Project’s use of solar panels. The Project’s building would be all electric, with the exception of gas in the retail portion. Also, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 square feet (sf) of new development consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City’s solar photovoltaic requirement, per the City’s Green Building Ordinance and CALGreen standards. The

Project would also implement Project Design Feature GHG-PDF-1: Green Building Features, which would feature a variety of green building features, such as EV parking, LED lighting, ENERGY STAR-rated appliances, and efficient water management features, all of which along with the inclusion of solar panels and a mostly electric building, would serve to minimize the Project's impact on climate change.

In addition, the Project's TDM Program, identified as Project Design Feature TRAF-PDF-2, consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a Project's TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. The effect of the TDM program would be to have less vehicle miles travelled (VMT) by Project residents, employees, and visitors, thus; reducing long-term mobile-source GHG emissions.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 5 - Deb Wallace

Comment DEIR 5-1

The commenter inquired about the Project's unit types and whether the Project Applicant intends to manage the building after it is built. The commenter also inquired the extent of excavation required for the Project.

Response to Comment DEIR 5-1

The comment inquired about the Project's unit types and whether the Project Applicant intends to manage the building after it is built. The Project proposed development program is described in Chapter 2, Project Description, of the Draft EIR. Specifically, Table 2-1, Development Program Summary, provides a breakdown of the Project's residential unit types.

The comment also inquired the extent of excavation required for the Project. As discussed on page 2-31 of the Draft EIR, the Project would require excavation to accommodate subterranean parking, building foundations, utilities and other improvements. Up to approximately 51,400 cubic yards (cy) of earthwork would be excavated and exported from the Project Site. Construction staging would be entirely internal to the Project Site. The Project would excavate to a maximum depth of 27 feet below grade. The Project's extent of excavation was accounted for throughout the Draft EIR.

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

Comment DEIR 5-2

The commenter also raised concerns about air pollution in the area of Fox Hills, including cumulative air quality impacts.

Response to Comment DEIR 5-2

This comment raises concerns about air quality impacts, including cumulative impacts. The Draft EIR addressed air quality impacts in Section 4.2, *Air Quality*, with supporting data provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations, of the Draft EIR. As analyzed therein, the Project would have less than significant air quality impacts related to construction (after mitigation) and operational air quality emissions. With regard to cumulative impacts, see pages 4.2-52 to page 4.2-54 of the Draft EIR. As discussed therein, the South Coast Air Quality Management District (SCAQMD) recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current Air Quality Management Plan (AQMP) be used to determine its potential cumulative impacts or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality. As the Project would not result in significant impacts based on either methodology, cumulative impacts for the Project would be less than significant.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 6 - Tom O'Neil

Comment DEIR 6-1

The commenter expressed concerns about the number of trees that would be removed based on the amount of grading and earthwork that will occur during construction.

Response to Comment DEIR 6-1

This comment expresses concerns regarding tree removal on the Project Site. There are 119 trees on the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus. In addition, there are 14 carrotwood street trees along Buckingham Parkway adjacent to the Project Site.

For any street tree removed, the Project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets, Sidewalks and Parkways, Section 9.08.215: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the Project is required to plant two new Street Right-of-Way (ROW) trees or Parkway trees for each street tree that is removed from the street ROW. The size and location of the replacement trees would be determined by the Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. The Project anticipates that one street tree along Buckingham Parkway near the proposed driveway would be removed. This tree will either be re-planted or replaced along Buckingham Parkway and an additional tree would be planted along Buckingham

Parkway to comply with City street tree replacement requirements. Aside from the above referenced street trees, the Project would remove the existing on-site trees and plant 56 new on-site trees. All tree removal and planting would occur in accordance with CCMC requirements.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 6-2

The commenter raised concerns about airflow due to the height of the building being taller than those around it.

Response to Comment 6-2

This comment raises concerns about airflow due to the height of the building being taller than those around it. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

Commenter 7 - Sharon Levine

Comment DEIR 7-1

The commenter inquired whether there are any codes that deal with view blockage, as well as sun shadows and air circulation (blockage of ocean breezes) with the height and massing of the proposed buildings.

Response to Comment DEIR 7-1

This comment raises concerns about view blockage airflow due to the height and massing of the building being taller than those around it. Refer to Response to Comment DEIR 1-1 which addresses concerns related to view blockage and airflow.

In addition, with regard to shadows, although the CEQA Guidelines do not provide a threshold pertinent to shade/shadow, the analysis in Section 4.1, Aesthetics, of the Draft EIR, takes into account the effects of shade and shadow as a visual character and quality effect. Shadow figures prepared for the Project are included as Appendix B – Shadow Study, of the Draft EIR. As discussed on pages 4.1-14 and 4.1-15 of the Draft EIR, the Project would add limited incremental shadows to the Fox Hills Parkette during the winter season in the afternoon hours, and not shade any portion of the residential uses across Buckingham Parkway year around. Given the Project’s limited shading of off-site routinely usable outdoor spaces, shading would not be an adverse effect of the Project's implementation.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 7-2

The commenter inquired about the trees currently onsite, including mature trees along Buckingham Parkway, and whether tree codes would be followed.

Response to Comment DEIR 7-2

This comment raises concerns about tree removal. Refer to Response to Comment DEIR 6-1 which addresses concerns related to tree removal.

2.1.2 Agency Comments

Letter AG 1

California Department of Transportation (Caltrans), District 7
Miya Edmonson, LDR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012
Received May 16, 2024

Comment AG 1-1

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 occupied by an approximately 30,672 square foot two-story office building. The Project would demolish the existing on-site building and construct a new 6- story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 19,526 square feet of private open space and 34,630 square feet of common open space for a total of 54,156 square feet of open space. The Project would include a total building area of 362,596 square feet. The Project would provide a total of 428 vehicular parking spaces (399 residential, 5 guest, and 24 commercial) within three parking levels. The Project would also provide 11 short-term and 81 long term bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces.

Response to Comment AG 1-1

This comment provides a general introduction to the comments raised in this correspondence. This comment also provides an accurate summary of the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-2

The Project is estimated to generate 1,266 net new daily trips, including 67 net new morning peak hour trips (-15 inbound trips, 82 outbound trips) and 77 net new afternoon peak hour trips (67 inbound trips, 10 outbound trips).

The Project was required to perform a VMT analysis because it is not located within 0.5 miles of a transit hub. Not accounting for any project design features or mitigations, the Project would result in a household VMT of 6.8 per capita, which is below the citywide household VMT threshold of 8.3 per capita. Based on this analysis, the Project was determined to be below the citywide VMT threshold for household VMT. Therefore, the Project would not result in a significant VMT impact, and no mitigation measures would be required.

Response to Comment AG 1-2

This comment acknowledges that the Project's VMT would be below the City's applicable thresholds and impacts would be less than significant. Because this comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-3

The Project provides adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The design of Project driveways does not introduce safety hazards for pedestrians, bicyclists, or motorists. The Project will incorporate pedestrian and bicycle-friendly designs, such as bicycle parking and improved sidewalks.

Response to Comment AG 1-3

This comment acknowledges that the Project would provide adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because this comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-4

We encourage the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

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

Response to Comment AG 1-4

This comment encourages the City of Culver City as the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications and TDM strategies and provides resources to access the recommended strategies. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-5

All construction activities would occur outside of the commuter morning and afternoon peak hours to the extent feasible and will not result in significant traffic impacts. A Construction Management Plan will ensure that construction impacts are less than significant.

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

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # GTS-2023-04495-DEIR..

Response to Comment 1-5

This comment states that a Construction Management Plan for the Project will ensure that construction impacts are less than significant. This comment regarding oversized trucks requiring a permit and recommendation that large-size truck trips be limited to off-peak commute periods is noted. Also, this comment provides Caltrans contact information in the event additional information is needed. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Letter AG 2

Los Angeles Metropolitan Transportation Authority
Cassie Truong, Senior Transportation Planner
One Gateway Plaza
Los Angeles, CA 90012-2952
Received May 17, 2024

Comment AG 2-1

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 5700 Hannum Avenue Residential and Commercial Mixed-Use (Project) located at 5700 Hannum Avenue in the City of Culver City (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

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

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes demolition of the existing on-suite building and construct a new six-story mixed-use building with two levels of subterranean levels. Project construction is anticipated to commence as early as the first quarter of 2025.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Response to Comment AG 2-1

The comment provided a brief introduction to Metro and their comments on the scope and content of the EIR, as well as summary of the Project. As the comment does not raise any

specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment AG 2-2

Recommendations for EIR Scope and Content

Bus

Service Adjacency

1. Service: Metro Bus Line 108 operates southbound on Buckingham Parkway, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Buckingham Parkway and Hannum Avenue. Other transit operators, such as Culver City Bus, may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

Response to Comment AG 2-2

This comment asks about impacts to Metro Bus service, specifically Line 108 which has a stop adjacent to the Project Site. The Draft EIR evaluated impacts to bus stop facilities in Section 4.11, *Transportation*, of the Draft EIR. As indicated on page 4.11-28, Metro Line 108 has a bus stop located adjacent to the Project Site along Buckingham Parkway. As neither of the Project's proposed driveways would interfere with the bus stop operation and adequate sight distance would be provided to ensure visibility between buses and vehicles at the driveway, no impact to transit activity or access would occur.

Comment AG 2-3

- a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)- compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

Response to Comment AG 2-3

This comment states the EIR should identify all bus stopped on streets adjacent to the Project Site. All bus lines in the Project area are listed on page 4.11-11 of the Draft EIR and illustrated

on Figure 4.11-1, Existing Transit Service, of the Draft EIR. Line 108 is the only line with a stop adjacent to the Project Site, as discussed in Response to Comment AG 2-2. Consistent with this comment, during Project construction, the Line 108 bus stop would be either maintained in its current condition and location, or temporarily relocated consistent with the needs of Metro Bus operations. Once the Project is completed, the bus stop would be returned to its pre-Project location and condition, unless otherwise directed by Metro.

Comment AG 2-4

- b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Response to Comment AG 2-4

This comment provides access requirements for transit facilities the Project must consider in its design. Consistent with this comment, driveways would be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic. Also, vehicular driveways would not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Comment AG 2-5

- c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.

Response to Comment AG 2-5

This comment encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. Consistent with this comment, the City will consider requesting the installation of such amenities as part of the Project.

Comment AG 2-6

- d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Response to Comment AG 2-6

This comment requests the Project to coordinate with Metro prior to the beginning of the Project construction. Consistent with this comment, the Project will coordinate with Metro prior to the beginning of the Project construction.

Comment AG 2-7

Transit Supportive Planning: Recommendations and Resources

Considering the Project area's proximity to Metro Bus Line 108, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro bus stops, including orienting pedestrian pathways towards the bus stop.
2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Project's development standards, including:
 - a. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access- controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micromobility devices are also encouraged.
 - b. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:

http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment AG 2-7

This comment recommends that the City encourage the Applicant to provide features that promote walkability, bicycle use and micromobility devices, and first and last mile access. Consistent with these recommendations, the Project provides numerous features such as wide sidewalks, pedestrian lighting, shade trees, bicycle parking, secured bicycle facilities, bicycle lockers, and a bicycle fix-it/repair station to improve pedestrian access and promote alternative modes of transportation.

Also, consistent with Metro’s comment, it is noted that the Project is required to develop a Travel Demand Management (TDM) Plan (see Project Design Feature TRAF-PDF-1). Among its planned elements are on-site enhancements to encourage alternative transportation modes, EV parking, off-site enhancements (i.e., mobility fees), a Transportation Information Center (TIC), bicycle parking amenities, pedestrian friendly features, employee carpool parking, a transportation coordinator, subsidized ride share programs, and transit passes. The Project would also include unbundled parking, which separates the cost of parking from the cost of leased commercial or residential space. While shared parking for on-site uses is not specifically identified among the preliminary set of strategies for optimizing on-site parking supply listed in TRAF-PDF-1, it would be considered by the City for inclusion in the final version of the TDM Plan that is required prior to issuance of the first certificate of occupancy for the Project.

The City will continue to work with the Project Applicant in advancing Metro’s recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-8

4. Wayfinding: Wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

Response to Comment AG 2-8

This comment states wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Consistent with this comment, the Project will provide information and wayfinding signage approved by Metro. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-9

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

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

Response to Comment AG 2-9

The comment provides Metro contact information in the event additional information is needed. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-10

Attachment

LA Metro's comment letter included a copy of the *Metro Adjacent Development Handbook, A guide for Cities and Developers*, February 2021.

Response to Comment AG 2-10

The comment is a copy of LA Metro's informational guidebook which is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services. The Project developer will consider the information in the guidebook, as applicable, to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Letter AG 3

California Air Resources Board
Annalisa Scilla, Ph.D, Assistant Division Chief
1001 I Street, P.O. Box 2815
Sacramento, CA 94812
Received May 20, 2024

Comment AG 3-1

I am writing to provide comments on the Culver City Draft Environmental Impact Report (DEIR) for the 5700 Hannum Mixed-Use Residential and Commercial Project (Project). The California Air Resources Board (CARB) works to support the State’s long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG) impacts of new development during the California Environmental Quality Act (CEQA) process. Specifically, CARB has an interest in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).¹

As noted in Appendix D, Local Actions, of the 2022 Scoping Plan (Appendix D), “[l]ocal government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State’s long-term climate goals.” With this in mind, CARB staff submit the following comments regarding the residential portion of this project.

Overall, this project is well aligned with the State’s climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. This letter includes two recommendations for further reducing vehicle miles traveled (VMT) and GHG emissions associated with the project.

Response to Comment AG 3-1

This comment provides a general introduction to the comments raised in this correspondence. This comment states the Project is well aligned with the State’s climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-2

Many aspects of the project currently align with Scoping Plan Appendix D Attributes

The project’s GHG analysis uses thresholds of significance based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. Consequently, one of the thresholds in the analysis (GHG-2) specifies that the project would have a significant impact related to GHG emissions if it would “[c]onflict with any applicable plan, policy or regulation adopted to reduce the emissions of GHGs”. As part of this analysis, the DEIR examines the project’s consistency with the 2022 Scoping Plan.

The project incorporates many of the recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. For example, the project's reuse of an existing developed site is characteristic of mixed-use development that is consistent with State GHG reduction goals. Table 1 compares the project attributes recommended in the Scoping Plan Appendix D, Table 3 to the design features included in the project.

Table 1. Appendix D Project Attributes Comparison Table

Project Attributes from Scoping Plan Appendix D, Table 3	Hannum Mixed-Use Residential and Commercial Project
Does not result in loss or conversion of natural or working lands	The project will redevelop a site within the city limits. No natural or working lands would be converted as a result of the project.
Electric Vehicle (EV) charging meeting most ambitious voluntary CA Green Building Code standard	20% of the residential parking provided will install conduit and panel capacity to accommodate electric vehicle charging stations. 10% of the spaces will be EV-ready and a further 10% will have EV charging stations installed.
Provision of on-site affordable housing	Of the 309 residential units developed by the project, 27 would be Very Low-Income units.
No net loss of existing affordable units	No housing will be removed as a result of the project.
Located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	The project will redevelop an existing two-story office building and associated surface parking. The project site is within the city limits and is surrounded by existing development.
New mixed-use or residential development includes transit-supportive densities, or ; New mixed-use or residential development is in proximity to existing transit stops, or ; More stringent criteria as specified in applicable SCS	Bus service exists on roadways adjacent to the site, with three bus stops either on or bordering the site. Additional bus lines exist within ¼ mile of the project boundary.
Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit	The project would develop 399 parking spaces for use by the residential portion of the project for a parking ratio of approximately 1.3 spaces per residential unit.

Response to Comment AG 3-2

This comment provides a summary consistency analysis of the Project with recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. As indicated in the table, the Project would be consistent with the recommendations Appendix D, Local Actions, of the Scoping Plan. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-3

Below, CARB provides additional details on some of the more notable features of the project identified in Table 1.

The project has a strong infill component

The project will redevelop a site that is currently occupied by an office building and associated surface parking. The project would construct 309 residential units and approximately 5,600 square feet of retail space, in addition to publicly accessible and common open space. The project site is centrally located within the city and is surrounded by existing development.

The project repurposes a site that consists of uses that are already served by utilities such as water and sewer. Consequently, the project models many of the attributes of an infill project as recommended in Appendix D of CARB's Scoping Plan. By directing this residential and commercial development to an underused site, the city is also protecting existing natural and working lands that could be threatened by greenfield development.

The project makes good use of existing transit options

Appendix D of the Scoping Plan recommends that new residential projects be developed in proximity to existing or planned transit and consist of transit-supportive densities. The project will develop approximately 138 residential units per acre, which exceeds the minimum of 20 residential dwelling units per acre necessary to be considered transit-supportive.

Additionally, the project is in proximity to transit, and several existing bus lines adjacent to the project site will serve the project. Several more transit alternatives are within ¼ mile of the project site. The availability of transit for project residents can help to reduce overall VMT, with a corresponding reduction in GHG.

Response to Comment AG 3-3

This comment provides support for the Project's consistency with CARB's Scoping Plan recommendations pertaining to infill development and proximity to transit by residential projects. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-4**Opportunities exist to achieve additional VMT and GHG reductions**

As noted above, the project incorporates many design features that are recommended in Appendix D of the State's Scoping Plan. Furthermore, the DEIR finds that the project's GHG impacts are less than significant. In addition to the elements already incorporated into the project, CARB identified some potential opportunities to further reduce operational GHG emissions associated with the project.

The project can reduce parking ratios

Appendix D recommends eliminating minimum parking requirements or establishing maximum allowable parking ratios, or supplying residential parking at a ratio of less than one parking space per dwelling unit as an additional project attribute that can reduce VMT and GHG. For multifamily residential units, Appendix D also suggests that the cost of parking be unbundled from the costs to rent or own a residential unit. The project includes a parking ratio of approximately 1.3 spaces per residential unit, which exceeds the reduced parking recommendations for residential development in Appendix D that are consistent with low VMT and GHG development.

This ratio could lead to VMT above what would be expected with a lower parking ratio. Consequently, a lower parking ratio can help to further limit the project's VMT and GHG emissions. This is especially the case because of the project's proximity to existing transit options. In addition, unbundling parking costs from rental or ownership costs can encourage reduced vehicle ownership with a resulting decrease in VMT.

Response to Comment AG 3-4

This comment offers suggestions to further reduce VMT through reduced parking and unbundled parking costs. As noted previously, the Project's VMT would be below the City's applicable thresholds and impacts would be less than significant. Consistent with this comment, the City has no minimum parking requirements. Also, the Project's parking would be unbundled. Nonetheless, the City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-5The project can provide additional EV charging infrastructure for residents

Another key project attribute listed in Appendix D of the Scoping Plan for residential and mixed-use development is the inclusion of infrastructure to promote transportation electrification. Appendix D recommends electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.

The project would install conduit and panel capacity to accommodate EV charging stations at a minimum of 20% of the residential parking spaces. An additional 10% of the parking spaces would be EV-ready and a further 10% of the spaces would be improved with EV charging stations. This would meet the Tier 1 CalGreen voluntary standard.

The project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces.

Response to Comment AG 3-5

This comment acknowledges that the Project would provide EV parking, but indicates the Project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces. The City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-6

Conclusion

CARB appreciates the opportunity to review and comment on the DEIR for the 5700 Hannum Mixed-Use Residential and Commercial Project. The project includes many characteristics that are consistent with the 2022 Scoping Plan's recommendations for residential and mixed-use development.

Additional VMT and GHG reductions could also be realized by limiting parking to a maximum of one space per unit for residential development and charging for parking separately instead of bundling that cost in with the cost of rent, as well as by increasing the number of EV charging stations available for residential parking spaces.

CARB would like to commend the city and the project proponent for repurposing an underused site within the city to create a mixed-use development that allows for growth while being largely consistent with California's climate goals for such projects.

If you have any questions, please feel free to contact Pedro Peterson at (279) 208-7367 or by email at Pedro.Peterson@arb.ca.gov.

Response to Comment AG 3-6

This comment included conclusionary remarks about the Project's consistency with the 2022 Scoping Plan's recommendations for residential and mixed-use development and reiterates the

Project's potential opportunities to further reduce VMT and GHG emissions as previously stated in Comments AG 3-4 and AG 3-5.

The City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

2.1.3 Individual Comments

Letter IND 1

Karyn Marks

Received May 20, 2024

Comment IND 1-1

As a resident of Fox Hills, I find it appalling that you would not consider ALL of the projects that you currently have slated for Fox Hills in an EIR for the area.

Since you are planning on “packing Fox Hills with units”. The EIR’s should be considered as a whole. You know what you are planning!

This is like operating on a patient with a complete disregard for the rest of the body!

You have multiple major projects planned that will impact our traffic, our flow of air, our pollution and you assess them one by one before any of them go up?

Why not a cumulative assessment? You are destroying where we live by putting so many new units and crowding our area way beyond the rest of Culver City.

We will never get out of our driveways when this is completed and our air quality with the 405 right here will be unbearable.

Spread these projects out evenly throughout Culver City.

Stop the discrimination of Fox Hills!

Do a cumulative assessment - That is the correct way to assess the impact on our community. To only look at the impact of 309 units when you are planning 3000 units is deceptive and inaccurate.

Why don’t you care? As the City Council, you should care about this!

Stop the discrimination of Fox Hills! We are angry at your disregard for our welfare.

Response to Comment IND 1-1

This comment asserts the EIR should consider all projects in the Fox Hills area in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

The comment further provides general opposition to the Project citing traffic and air quality concerns. Refer to Response to Comment DEIR 5-2 which addresses concerns related to cumulative air quality impacts.

With regard to traffic impacts, the Project conducted a Transportation Assessment (TA) that evaluated transportation impacts required by CEQA, as well as a non-CEQA component for consistency with the City's CEQA transportation thresholds of significance and the Transportation Study Criteria and Guidelines (TSCG) adopted in July 2020.² The TA is included in Appendix I of the Draft EIR.

Pursuant to SB 743, the California Natural Resources Agency adopted the Office of Planning and Research's (OPR's) recommended vehicle miles traveled (VMT) guidelines on December 28, 2018. The guidelines resulted in changes to Section 15064.3 and Appendix G of the CEQA Guidelines that effectively removed automobile delay and associated level of service (LOS) as the metric to evaluate transportation impacts pursuant to CEQA, and replaced it with VMT. Accordingly, pursuant to these changes, the City adopted VMT as a CEQA threshold to determine transportation impacts. Therefore, the analysis of transportation impacts in Section 4.11, *Transportation*, of the Draft EIR was focused on VMT and other analyses required by Appendix G of the CEQA Guidelines. Transportation issues not required to be analyzed under CEQA are presented in Chapter 5 of the TA (Appendix I of the Draft EIR). As evaluated in Section 4.11, *Transportation*, of the Draft EIR, transportation related impacts of the Project would be less than significant.

Based on the City's TSCG guidance, LOS, congestion, delay, and parking effects are no longer considered impacts on the environment and, therefore, such effects were not evaluated as CEQA impacts in the Draft EIR. As such, refer to Chapter 5 of the TA for a discussion of these issues.

The City, through the TSCG, continues to require that transportation assessments analyze various non-CEQA transportation topics, such as pedestrian, bicycle and transit access, intersection operations, project access, construction period traffic effects, and residential street cut-through effects. The City's TSCG also establishes various criteria for these analyses where corrective actions may be appropriate to address non-CEQA adverse effects. These issues are discussed in the non-CEQA portion (Chapter 5) of the TA prepared for the Project. The results of these analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

² On July 13, 2020, the Culver City Council adopted a resolution formally implementing the City's updated transportation thresholds of significance for CEQA analyses and overall transportation study guidelines. The TSCG is the document providing the guidance for conducting both CEQA and non-CEQA transportation analyses.

Letter IND 2

Jeff Haas

Received May 20, 2024

Comment IND 2-1

Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development. These 2 omitted projects (listed above) must be fully analyzed for their impact on the proposed changes to the Fox Hills area streets.

Link to EIR:

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Response to Comment IND 2-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 3

Judi Sherman

Received May 20, 2024

Comment IND 3-1

The following are my comments regarding the EIR for the 5700 Hannum Avenue proposed mixed use project:

The EIR is incomplete as it does not address the Cumulative Impact of the other two proposed projects in close proximity to the 5700 Hannum Avenue proposed project. Of the 12 related projects listed in the EIR on page 82/Table 3.1, the proposed projects at 5757 Uplander Way and 5730 Uplander Way were not included. These 2 projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue project and their cumulative impact must be fully analyzed for this EIR to have any value in its results.

Response to Comment IND 3-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 3-2

In addition, there is no documentation about the impact that this project will have on the natural breezes that the 26 residential complexes now have. This issue is important to fully address, as these present complexes do not have central air conditioning. A detailed effect of the blockage that the 5700 Hannum Avenue project will have was missing from this EIR as well. Please address.

Response to Comment 3-2

This comment raises concerns about airflow due to the Project's new building at its proposed height and massing. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

Letter IND 4

Thomas O'Neil

Received May 20, 2024

Comment IND 4-1

Is the land made for the people or were people made to serve the land?

Is the EIR to serve the planet or to serve the people living on it?

So much of what has undergirded land use policy for decades in California is pride in saving the environment for the environment's sake. The fundamental notion that the land was made for the people has been set aside.

It is essential to strike a balance in all things, however. So, the question that should be at the front of our collective mind when considering any new development is the effect that it will have ON THE PEOPLE already living in the space that is designated for that development.

There needs be space to move, easy access to essential services, preservation of existing gifts of nature that enhance the lives of the people including the natural flow of clean air, and life-giving air-purifying trees and open space, and basic efficient supplies of water and power to facilitate civilized living.

All these natural gifts and manmade services in balance with the size of the population that they can comfortably support.

The fact that the State has seen fit to block development for decades through the abuse of EIRs, throughout the State, is no excuse for now imposing overdevelopment in areas, like Fox Hills, that are in what has already been considered by the experts to be in line with their own nearer ideal criteria.

The State has tasked our City with creating 3,300 living spaces. And the projects that have been planned THUS FAR would drop 1,700 of those dwellings in what is already the most densely populated part of our fair city, Fox Hills, thereby destroying a balance that has served the people living here well, for decades.

Why Fox Hills? Why now?

Because it's easy? Because it's cheap? Because it's a fast buck? Because it serves certain vested interests like Amazon, or Apple, or Google?

Why now, when a million people have left California and while thousands of existing units sit vacant, from here to San Francisco?

There must have been considerable thought given to the portion of the proposed essential housing burden imposed on each municipality. But who made the decisions and whose ox was being gored in the making? Whose ideology or pocketbook was being served?

These are of course, to some degree, rhetorical questions.

The mindset of urban planners is well known. “Save the Planet.”

And while California remained shut down longer than any other State, who was buying up the shuttered businesses and vacated properties?

All in order to serve whom or what? Certainly not the people who live in Fox Hills or the rest of Culver City for that matter. Certainly not to bring balance where it already exists.

5700 Hannum is a foot in the door, and a slap in the face to the people of Fox Hills. The developers pitch “5700 Hannum” as a transition from the office buildings on Corporate Pointe.

Well, we already have that “transition.” A street lined with large trees and other plant life and a quiet, low-density low-rise business park that provides a real transition from the hustle and bustle of the Mall and its neighboring businesses. The developer’s ”transition” is no transition at all, rather an intrusion.

California is BIG COUNTRY. Plenty of room to live and build. But some of those who have been elected to oversee the quality of life for the rest of us, and too many unelected bureaucrats, have a twisted vision of what that living should be like. Cram as many units into as small a space as possible. Take as many cars off the street as possible. Control where and how people come and go. There’s a name for that, and it isn’t America.

Gavin Newsom lives in a 12,000 square foot house on an 8.2 acre estate along the American River in Northern California. 6 bedrooms, 10 baths, pool, tennis court, jacuzzi, and wine cave. And that's not including his winery which remained open while he shut others down.

How about some EQUITY, here. Tell the Governor to drop 3,300 units on his 8 acre estate.

That seems a reasonable sacrifice for him to make for the people of Culver City and Fox Hills, a sacrifice by someone who has made none so far.

His mantra and that of the State Houses: Rules for thee but not for me.

Doesn't our City, Culver City, hold a higher moral and ethical standard than that?

Response to Comment IND 4-1

This comment provided general opposition to the Project due the density of the Project along with other proposed projects in the Fox Hills area. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 5

Angelika Kischnick

Received May 20, 2024

Comment 5-1

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Of the 12 related projects listed in the report link on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, would result in an additional 1,396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 5-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 5-2

Among utmost concern:

* Utilities (water, power, gas) - Supply & Resulting Pollution ...

We current neighboring residents were already forced to cut back on water usage in recent years, urged to operate appliances during off-hours to prevent outages. Each newly built unit will run A/C's, TV's and electronic devices at minimum, possibly washers, dryers, dish washers, electric vehicle charging stations etc. The resulting detrimental pollution impact also needs to be considered.

Response to Comment IND 5-2

This comment raises concerns regarding the ability of utility providers to the serve the Project and resulting pollution from the Project (presumably pollution is referring to air quality and possibly greenhouse gas emissions). With regard to concerns regarding impacts to utility services and facilities, refer to Response to Comment No. DEIR 1-1. With regard to air quality impacts, refer to Response to Comment DEIR 5-2. In addition, with regard to greenhouse gas emission impacts, refer to Response to Comment DEIR 4-1.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 5-3

* Lack of sufficient parking per project

Most people have to share units to afford rent, so 2-3 occupants /unit would be the anticipated norm. L.A. is too wide spread and its public transportation system under-developed, one even needs a car to get to public transportation. Thus, 2 minimum parking space / unit, plus parking for guests, staff, service personnel, deliveries, commercial space traffic etc. would be needed. Drivers / cars will flood and pollute the entire neighborhood on approach, while circling for parking, and departure. Most alarming to me is that all street parking for us neighbors will be eliminated..

Response to Comment IND 5-3

This comment raises concerns regarding parking, citing that parking will potentially not be adequate resulting cars parking off-site leading to traffic and pollution. Refer to Response to Comment DEIR 1-2 which addresses concerns related to parking for the Project. Regarding transportation-related impacts, refer to Response to Comment IND 1-1. With regard to air quality impacts, refer to Response to Comment DEIR 5-2. In addition, with regard to greenhouse gas emission impacts, refer to Response to Comment DEIR 4-1.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 6 (A-B)

Justin Ciampaglia

Received May 20 and May 21, 2024

The commenter provided two (2) comment letters, with May 21, 2024 letter including all of the comments included in his May 20, 2024 letter. Thus, below are comments from the May 21, 2024 letter.

Comment 6-1

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

A day-care Montessori school may still be in operation at Heather Village Condos and trigger the requirement Impact HAZ-3:

Emit Hazardous Materials Within One-Quarter Mile of a School (Impact HAZ-3): The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one mile of a school.

Response to Comment IND 6-1

This comment raises concerns regarding the emission of hazardous materials to the Montessori school that may still be in operation at Heather Village Condos. The CEQA Guidelines Appendix G threshold question in this regard, and asks whether a Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. First, the Montessori school in question is located just over 0.30 miles from the Project Site. As such, it does not meet the distance requirement under this threshold. Regardless, all hazardous materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Health and Safety Administration (OSHA) requirements. As such, the use of such materials would not create a significant hazard to any nearby existing or proposed schools. Therefore, impacts would be less than significant.

Comment IND 6-2

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant

pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Response to Comment IND 6-2

This comment includes a quote that is misattributed to the Draft EIR. This quote is not included in the Draft EIR. The comment requests to include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park. No such statement is needed or required to support the impact analysis of the Project's consistency under Threshold AIR-1 with the South Coast Air Quality Management District (SCAMD) Air Quality Management Plan (AQMP) in Section 4.2, *Air Quality*, of the Draft EIR. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment IND 6-3

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

Response to Comment IND 6-3

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes. Also, refer to Response to Comment DEIR

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-4

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 6-4

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-5

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: “Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts.”

From the EIR “the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.” We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR “The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations.” This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Response to Comment IND 6-5

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-6

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the

projects. Many people to be informed rely on advocacy groups that work for the neighborhood. The spirit of the law is not met with 500 ft. We must have at least 2000 ft notice requirement to make sure everyone affected by the change is notified. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. The city can protect the residents facing the highest disproportionate burden from population density in our City.**

Response to Comment IND 6-6

This comment states that not every resident in Fox Hills received notice of the Draft EIR. The commenter suggests that the mailing radius notice be extended from 500 feet to 2,000 feet. The commenter also states the notice should include any exemption or exception of a law that protects the public. The Notice of Completion and Availability of the Draft EIR for the Project met and applicable noticing requirements per CEQA Guidelines Section 15087, Public Review of the Draft EIR. In addition to the 500-foot mailing, the notice was published in the Culver City News newspaper and made available on the City's Planning Division website, at Culver City Hall, and at the Culver City Julian Dixon Library and Baldwin Hills Branch Library. The notice also included applicable components as required by CEQA Guidelines Section 15087.

As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 7 (Form Letter)

Tanya Ihnen (IND 7A)
Yumi Mandt-Rauch (IND 7B)
Eurana High (IND 7C)
Irene French (IND 7D)
Gabriel Parhoti (IND 7E)
Received May 20, 2024 (IND 7F)

The above listed commenters submitted the same form letter comments. See Appendix A, Original Draft EIR Comment Letters, of this Final EIR, for copies of the original letters.

Comment IND 7-1

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice is is [sic] given for transparency. If the developer is asking for an exemption or exception of a law that protects the public, that should be in the notice. Not the law number, but in words that a common person can understand. The city must protect the residents and always have the residents BEST interest first!

Response to Comment IND 7-1

This comment states that not every resident received direct notice for the Project, as well as other projects that affect Fox Hills residents. This comment is similarly raised in in Comment IND 6-6. Refer to Response to Comment IND 6-6 for a response to this comment.

As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-2

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city

of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.

Response to Comment IND 7-2

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes. Also refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-3

2. The EIR shows “Unavoidable Significant Impact”. Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 7-3

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

Comment IND 7-4

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the

potential for significant environmental impacts. “ City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.

4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.”..... We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. “ This is one more reason to study the air flow (ocean breeze) affect. It can cause of [sic] air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.

Response to Comment IND 7-4

This comment states the City should prepare an EIR which addresses the comments raised by the residents herein. However, the comments herein do not provide substantial evidence of significant new information showing that there is a new significant impact, an increase in the severity of an impact, an alternative that would lessen the impacts, or that the Draft EIR is fundamentally flawed to support a contention that the Draft EIR is required to be recirculated pursuant to CEQA Guidelines Section 15088.5. There is also no substantial evidence provided by the commenter that supports the claim that the Project could result in a change of temperature by 1 or 2 degrees. As such, the comment does not demonstrate that recirculation of the Draft EIR nor a new Draft EIR is required. Also, the only significant and unavoidable impacts the Draft EIR has identified is related to temporary construction noise. Approval of the Project would require a Statement of Overriding Considerations explaining what factors the City considered in approving the Project notwithstanding the potential for this temporary significant environmental impact.

In addition, this comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-5

5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)

Response to Comment IND 7-5

This comment provides support for Alternative 1 (No Project Alternative) or Alternative 3 (Reduced Project Alternative) included in the Draft EIR. As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-6

6. Lower height for every building. Do not exceed existing building height.

Response to Comment IND 7-6

This comment requests Project building heights that do not exceed existing building heights. As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

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CHAPTER 3

Revisions, Clarifications, and Corrections to the Draft EIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132 (a), this Chapter of the Final EIR shall include changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document.

However, based on the comments and responses included in Chapter 2, Responses and Comments, of this Final EIR, no revisions to the Draft EIR are necessary.

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CHAPTER 4

Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1, *Mitigation Monitoring Program***, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the 5700 Hannum Avenue Mixed-Use Residential and Commercial Project (Project). The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR, and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis*, of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes project design features identified throughout Chapter 4 of the Draft EIR. Because project design features have been incorporated into the Project, they do not constitute mitigation measures. However, project design features are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The project design features and mitigation measures are identified by the impact category and numbered to correspond with the Initial Study, in the case of Biological Resources, and the Draft EIR.

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Aesthetics				
<p>AES-PDF-1: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division
Air Quality				
<p>MM-AQ-1: Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:</p> <ul style="list-style-type: none"> • The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided. • Use electrified tower cranes in place of diesel-fueled equipment. 	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
Biological Resources				
<p>MM-BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either:</p> <ol style="list-style-type: none"> 1) Vegetation removal and/or construction-related activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed; or 2) If avoidance of the avian breeding season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) is not feasible, then: <ol style="list-style-type: none"> a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing 	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.	Culver City Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.</p> <p>b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area.</p> <p>Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. In addition, pre-construction surveys and/or construction monitoring shall also be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.</p>				

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources				
<p>MM-ARCH-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as site demolition (e.g., building footings/foundations, subsurface utilities, surface parking lots, sidewalks, etc.), clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.</p> <p>Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
<p>MM-ARCH-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work within the buffer area shall only be allowed to continue after the evaluation and recovery efforts are completed. Work shall be allowed to continue outside of the buffer area.</p> <p>All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>shall coordinate with the Applicant and the City of Culver City (City) to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.</p>				
<p>MM-ARCH-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.</p>	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division
Geology and Soils				
<p>MM-GEO-1: Prior to the issuance of grading permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
<p>MM-GEO-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments and undisturbed Baldwin Hills Paleosol. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit, Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>from each producing geologic unit, per SVP Guidelines (2010). The sample(s) can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist and the monitor shall have authority to temporarily stop excavation activity or to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.</p>				
<p>MM-GEO-3: If the older Quaternary alluvium produces any mollusk fossils, a specimen shall be submitted for radiocarbon dating. If the Fox Hills Paleosol produces any pedogenic calcium carbonate, a sample shall be submitted for radiocarbon dating.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Public Works, Engineering and Planning Division
<p>MM-GEO-4: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.</p>	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Greenhouse Gas Emissions				
<p>GHG-PDF-1: Green Building Features. The Project will include the following green building features:</p> <ul style="list-style-type: none"> • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certified performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements. • The Project will include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. • The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. • The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. • The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. • The Project will utilize only electricity and no natural gas in all land uses except for the retail space. 	Condition of Approval	Plan Check Notes	Prior to issuance of a Building Permit	Culver City Building Safety Division, Planning Division
Noise				
<p>NOI-PDF-1 : Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to adjacent property owners and occupants. Evidence of such notification will be provided to the City of Culver City Public Works Department. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).</p>	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating shoring piles to be drilled will be used.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at the City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of Culver City.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
NOI-PDF-4: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-5: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-6: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in discrete areas of the outdoor common opens space areas courtyard such that the sound would be mostly blocked by the proposed on-site building or walls from off-site residential receivers. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07, Noise Regulations, of the CCMC. The systems will at a minimum be designed so as not to result in a perceivable increase at the nearest noise sensitive residential receptor. Specifically, daytime outdoor	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>amplified sound systems will not result in an increase of 5 dBA Leq over existing ambient noise conditions at the nearest noise sensitive residential receptor. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996). A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.</p>				
<p>MM-NOI-1: Temporary noise barriers shall be installed along the southern and eastern Project boundary to shield the sensitive receptors from construction noise. The barrier shall have a minimum height of 6 to 15 feet (from south to north, with the top of the barrier at least 15 feet above the ground surface of the residences to the east along Buckingham Parkway) that is made of sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by 17 to 19 dBA.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit, Verified at Preconstruction Meeting with City of Culver City and Ongoing during Construction.	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
<p>MM-NOI-2: Since construction equipment operates intermittently, and the types of equipment change with the stage of construction, noise emitted during construction would be mobile and highly variable. The following features shall be implemented during Project construction to reduce noise levels:</p> <ul style="list-style-type: none"> • Maintain all construction tools and equipment in good operating order according to manufacturers' specifications. • To the extent practicable, schedule construction activity during normal working hours between 8 a.m. and 5 p.m. on weekdays when higher sound levels are typically present and are found acceptable. • Equip internal combustion engines with properly operating mufflers that are free from rust, holes, and leaks. • For construction equipment that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible. 	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
Public Services				
<p>POL-PDF-1: Project Site Security and Access During Construction. During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>POL-PDF-2: Project Site Security and Access During Operation. During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division
Transportation				
<p>TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning manager for the City of Culver City, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.</p> <p>Prior to commencement of construction, the contractor will advise the City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.</p> <p>Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community:</p> <ol style="list-style-type: none"> 1. Construction schedule and hours. 2. Framework for construction phases. 3. Identify traffic diversion plan by phase and activity. 4. Potential location of construction parking and office trailers. 	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and Ongoing during Construction	Culver City Building Safety, Planning, Public Works, Fire and Police Departments

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).</p> <p>6. Emergency access plan.</p> <p>7. Demolition plan.</p> <p>8. Staging plan for the concrete pours, material loading and removal.</p> <p>9. Crane location(s).</p> <p>10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).</p> <p>11. Community notification procedures.</p> <p>The FCMP will at a minimum include the following:</p> <ol style="list-style-type: none"> 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations. 2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community concerns the City of Culver City personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by the City of Culver City. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control 				

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>plan(s), approved by the City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the Culver City Fire and Police Departments to minimize potential effects on traffic flow and emergency response.</p> <p>8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.</p>				
<p>TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement TDM measures that include, but are not limited to, those listed below subject to Culver City Transportation Department review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site by residents, visitors and employees, as well peak hour traffic. The TDM strategies necessary comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:</p> <p>On-Site Enhancements - The Project design will incorporate mobility features to encourage alternative transportation modes. The features will be designed in accordance with the City Municipal Code requirements and standards.</p> <ul style="list-style-type: none"> • Pedestrian Connections. The Project will provide exclusive pedestrian access separate from vehicular driveways. The Project will provide internal walkways that connect the pedestrian access points to off-site pedestrian facilities, rideshare, and transit. • Bicycle Parking and Amenities. The Project will provide both short-term and long-term bicycle parking spaces on-site in accordance with the City Municipal Code requirements. Short-term bicycle parking, which will include bicycle racks, will be located near the pedestrian entrance. Long-term bicycle parking, which will include bicycle lockers or secure bicycle enclosures, will be placed in an accessible weather protected location. 	Condition of Approval	Approval of Plan	During Plan Check and prior to issuance of a Certificate of Occupancy	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>Electric Vehicle (EV) Parking. In accordance with City Municipal Code Section 17.320.035.O.3, at least 40% of the onsite parking supply will have EV capability, including EV Capable spaces (20%), EV Ready spaces (10%), and Full EV Charger/Charging Stations (10%).</p> <p>Off-Site Enhancements - The Project will improve and contribute toward improvements to off-site mobility facilities to encourage alternative transportation modes.</p> <ul style="list-style-type: none"> • Mobility Fees. In accordance with City Municipal Code Section 05.06.015, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce VMT and support housing and job growth. Pursuant to Resolution No. 2021-R055, the total mobility fee for the Project will be based on a rate of \$3,394 per multi-family unit and \$14.92 per sf of commercial space. <p>Other TDM Strategies - The Project will implement TDM strategies to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The following details the minimum TDM strategies necessary to comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:</p> <ul style="list-style-type: none"> • Transportation Information Center (TIC). The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal. • Bicycle Parking and Amenities. The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). • Pedestrian-Friendly Environment. The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at 				

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts.</p> <ul style="list-style-type: none"> • Employee Parking. At least 10% of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Vanpool spaces will have a minimum parking space dimension of nine feet wide by 18 feet in length and provide a minimum interior vertical clearance of eight feet two inches. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers will also be provided. • Bus Stop Improvements. If deemed necessary by the City, bus stop improvements will be provided to the satisfaction of the City Director of Transportation. <p>Plan/Program Management - The Project will take appropriate measures to help future residents and employees manage each TM Plan element and maximize program participation through consolidation of information and proactive engagement. The following will be provided as part of the TDM Plan:</p> <ul style="list-style-type: none"> • Project Transportation Coordinator. A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current. • Transportation Information Packet for New Residents and Employees. Each new resident and employee will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator. <p>Mobility Hub Support and Alternative Transportation - The Project will incorporate measures and design elements to support first-mile/last-mile service connection for transit users and reduce reliance on personal automobiles. The following will be provided as part of the TDM Plan:</p> <ul style="list-style-type: none"> • Bike Repair Station. The Project will provide an on-site bike parking station for use by Project residents and employees that has a space and basic tool set for bike repairs. • Subsidized Shared-Ride/Uber/Lift Service. Employees who arrive to work via a means other than a single-passenger vehicle or utilize the carpool matching service will automatically be registered in a Subsidized Shared-Ride/Uber/Lift Service by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home or 				

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>Uber/Lyft (or similar shared ride service) in case of illness or emergency. The Project will provide up to \$750 in total for this program every year. The subsidy will be for two years after Certificate of Occupancy over a two-year period.</p> <ul style="list-style-type: none"> • Transit Passes. The Project will provide up to \$500 per pass per year of subsidies for up to five Transit Access Passes (TAP) cards for a period of three years for employees who opt to take Metro instead of personal vehicles and will not be provided on-site parking accommodations and not receive a car share subsidy. 				
Tribal Cultural Resources				
<p>TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project.</p> <p>Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.</p> <p>Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.</p>	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
<p>TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.</p> <p>Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.</p> <p>If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its</p>	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.</p> <p>The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.</p> <p>The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p>Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney’s office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).</p>				
Utilities and Service Systems				
<p>WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Landscape and Irrigation <ul style="list-style-type: none"> ○ California Friendly® plants or native plants ○ Drip/ Subsurface Irrigation (Micro-Irrigation) ○ Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) 	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering, and Planning Division

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

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*

May 16, 2024

Jose Mendivil, Associate Planner
Planning Division, 2nd Floor
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

RE: 5700 Hannum Avenue Residential and
Commercial Mixed-Use Project
SCH # 2023080709
Vic. LA-90/PM 2.94, LA-405/PM 24.28
GTS # GTS-2023-04495-DEIR

Dear Jose Mendivil:

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 occupied by an approximately 30,672 square foot two-story office building. The Project would demolish the existing on-site building and construct a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 19,526 square feet of private open space and 34,630 square feet of common open space for a total of 54,156 square feet of open space. The Project would include a total building area of 362,596 square feet. The Project would provide a total of 428 vehicular parking spaces (399 residential, 5 guest, and 24 commercial) within three parking levels. The Project would also provide 11 short-term and 81 long term bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces.

The Project is estimated to generate 1,266 net new daily trips, including 67 net new morning peak hour trips (-15 inbound trips, 82 outbound trips) and 77 net new afternoon peak hour trips (67 inbound trips, 10 outbound trips).

The Project was required to perform a VMT analysis because it is not located within 0.5 miles of a transit hub. Not accounting for any project design features or mitigations, the Project would result in a household VMT of 6.8 per capita, which is below the citywide household VMT threshold of 8.3 per capita. Based on this analysis, the Project was

determined to be below the citywide VMT threshold for household VMT. Therefore, the Project would not result in a significant VMT impact, and no mitigation measures would be required.

The Project provides adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The design of Project driveways does not introduce safety hazards for pedestrians, bicyclists, or motorists. The Project will incorporate pedestrian and bicycle-friendly designs, such as bicycle parking and improved sidewalks.

We encourage the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

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

All construction activities would occur outside of the commuter morning and afternoon peak hours to the extent feasible and will not result in significant traffic impacts. A Construction Management Plan will ensure that construction impacts are less than significant.

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

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # GTS-2023-04495-DEIR.

Sincerely,

Anthony Higgins for

MIYA EDMOSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Letter AG 2



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 17, 2024

Jose Mendivil
City of Culver City
Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232

Sent by Email: jose.mendivil@culvercity.org

RE: 5700 Hannum Avenue Residential and Commercial Mixed-Use
Notice of Availability of Environmental Impact Report (EIR)

Dear Mr. Mendivil:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 5700 Hannum Avenue Residential and Commercial Mixed-Use (Project) located at 5700 Hannum Avenue in the City of Culver City (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

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

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes demolition of the existing on-suite building and construct a new six-story mixed-use building with two levels of subterranean levels. Project construction is anticipated to commence as early as the first quarter of 2025.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Line 108 operates southbound on Buckingham Parkway, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Buckingham Parkway and Hannum Avenue. Other transit operators, such as Culver City Bus, may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
 - b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
 - c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.

- d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Transit Supportive Planning: Recommendations and Resources

Considering the Project area's proximity to Metro Bus Line 108, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro bus stops, including orienting pedestrian pathways towards the bus stop.
2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Project's development standards, including:
 - a. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.
 - b. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
4. Wayfinding: Wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring

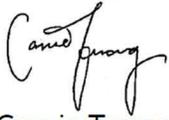
5700 Hannum Avenue
Notice of Availability of EIR – Metro Comments
May 17, 2024

the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

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

Sincerely,



Cassie Truong
Senior Transportation Planner
Transit Oriented Communities

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

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

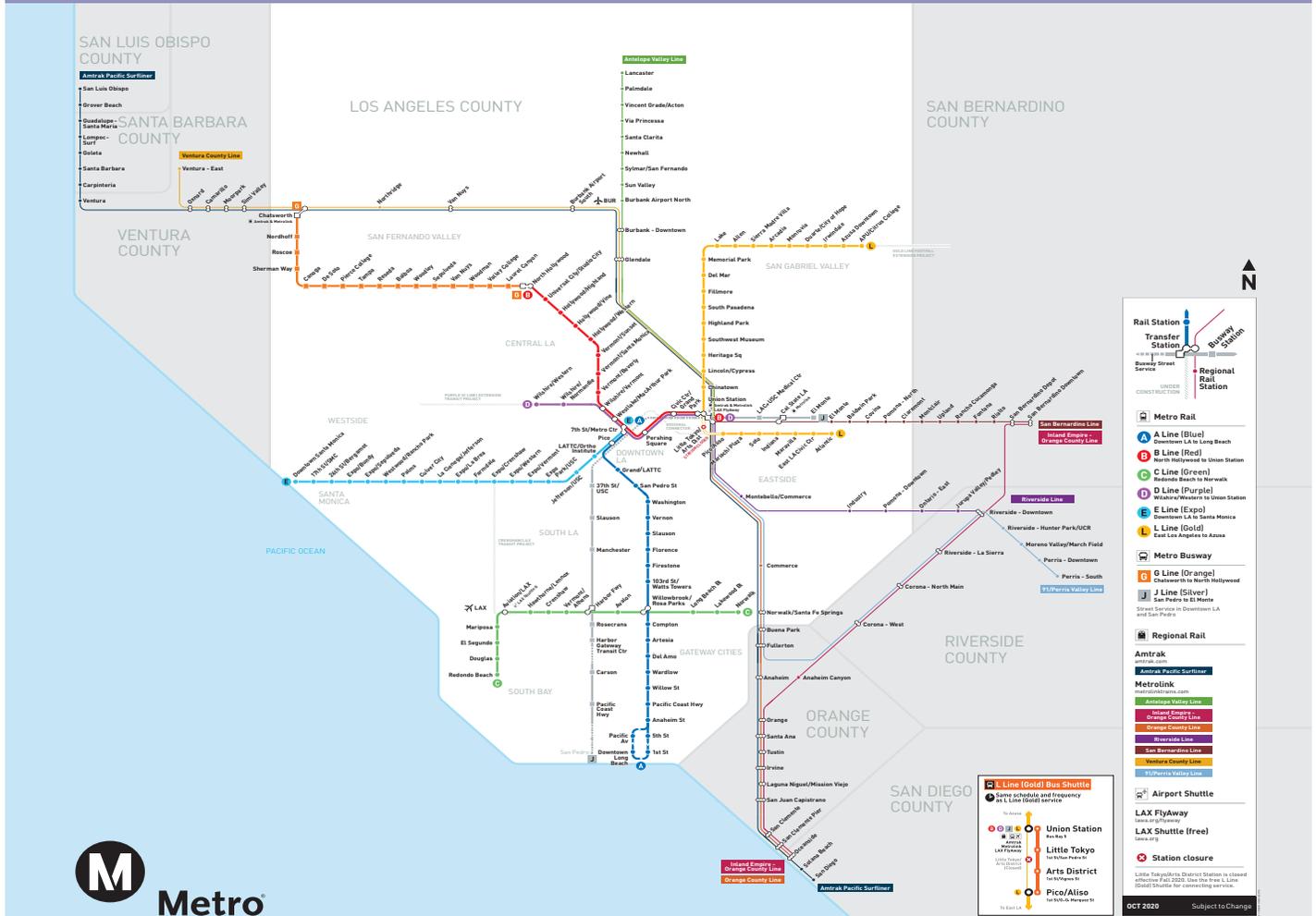
February 2021



Metro and Regional Rail Map

Metro & Regional Rail

metro.net
 pacificsurfliner.com
 metrolinktrains.com



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

Table of Contents

Quick Overview	1
Background	2
Metro Purview & Concerns	4
Metro Coordination Process	6
Best Practices	8
1. Site Plan & Conceptual Design	11
1.1 Supporting Transit Oriented Communities	12
1.2 Enhancing Access to Transit	13
1.3 Building Setback	14
1.4 Overhead Catenary System (OCS) Clearance	15
1.5 Underground Station Portal Clearance	16
1.6 Shared Barrier Construction & Maintenance	17
1.7 Project Orientation & Noise Mitigation	18
1.8 At-Grade Rail Crossings	19
1.9 Sight-Lines at Crossings	20
1.10 Driveway/Access Management	21
1.11 Bus Stop & Zones Design	22
2. Engineering & Technical Review	25
2.1 Excavation Support System Design	26
2.2 Proximity to Tunnels	27
2.3 Protection from Explosion/Blast	28
3. Construction Safety & Management	31
3.1 Pre-Construction Coordination	32
3.2 Track Access and Safety	33
3.3 Construction Hours	34
3.4 Excavation/Drilling Monitoring	35
3.5 Crane Operations	36
3.6 Construction Barriers & Overhead Protection	37
3.7 Pedestrian & Emergency Access	38
3.8 Impacts to Bus Routes & Stops	39
3.9 Utility Coordination	40
3.10 Air Quality & Ventilation Protection	41
Glossary	42



Quick Overview

Purpose of Handbook

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

Overarching Goal

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

Intended Audience

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

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

Handbook Content

The Handbook includes:

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

RULE OF THUMB: 100 FEET

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

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

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

Contact Us

For questions, contact the Development Review Team:

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

Additional Information & Resources

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

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

Background

Who is Metro?

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



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



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



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



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

Why is Metro interested in adjacent development?

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

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

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

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



Metro Purview & Concerns

Metro Purview for Review & Coordination

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

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

Key Audiences for Handbook

The Handbook is intended to be used by:

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

Metro Assets & Common Concerns for Adjacent Development

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

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

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



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

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



AT-GRADE ROW

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

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



BUS STOPS

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

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



NON-REVENUE/OPERATIONAL

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

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

Metro Coordination Process

Typical Stages of Metro Review and Coordination

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



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

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

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

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

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

Contact:

Metro Development Review Team

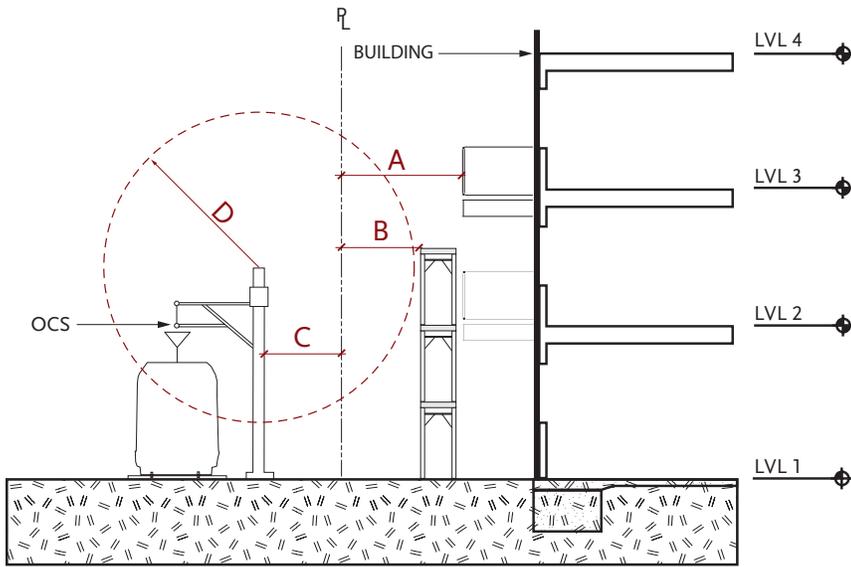
Website: <https://www.metro.net/devreview>

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

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



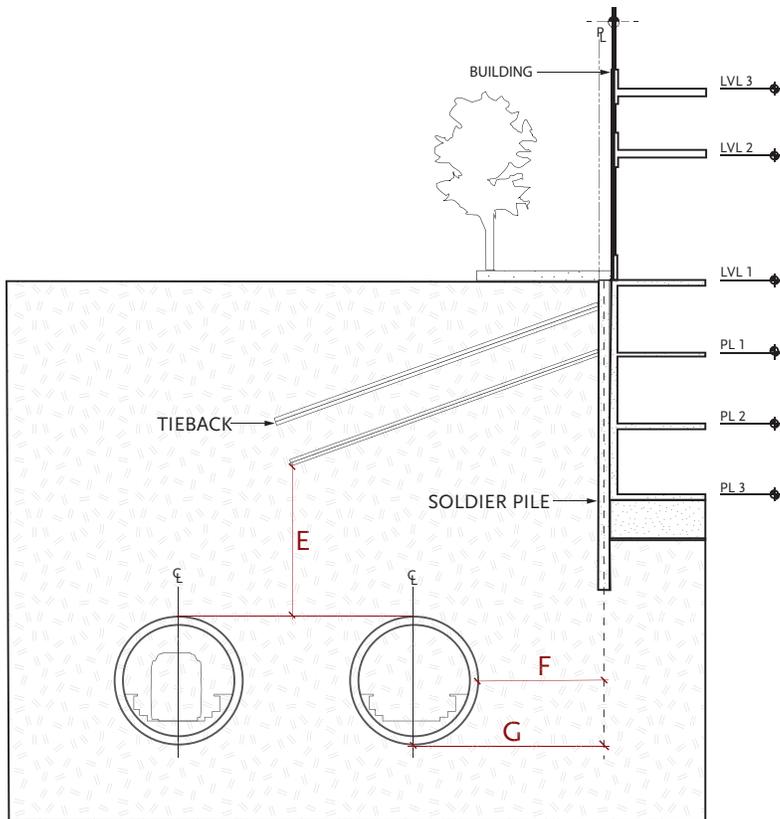
AT-GRADE CONDITION

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

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

C. Distance from property line to nearest Metro facility.

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



BELOW-GRADE CONDITION

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

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

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

Best Practices

Best Practices for Developer Coordination

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

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

Best Practices for Local Jurisdiction Notification

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

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



M

Metro

Downtown
Santa
Monica

E

Man in green t-shirt and shorts walking.

Woman in white shirt and blue jeans walking on phone.

Man in red jacket and black pants walking with cane.

Man in white shirt and black backpack walking.

White shopping bags with 'santamonicacom' printed on them.



Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

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

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

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



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



1.2 Enhancing Access to Transit

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

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

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



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

Site Plan & Conceptual Design

1.3 Building Setback

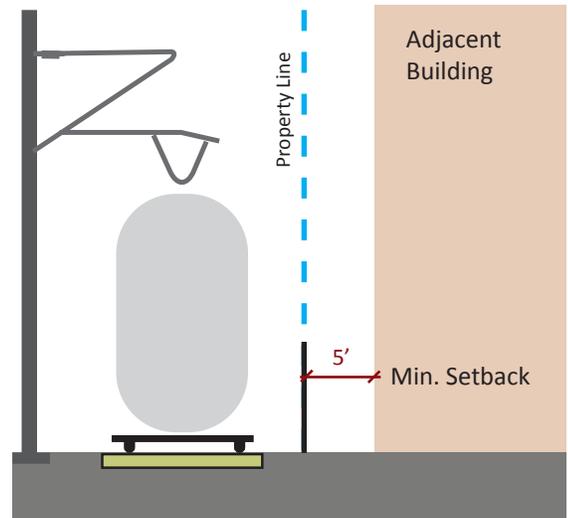
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro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

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

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

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

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



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

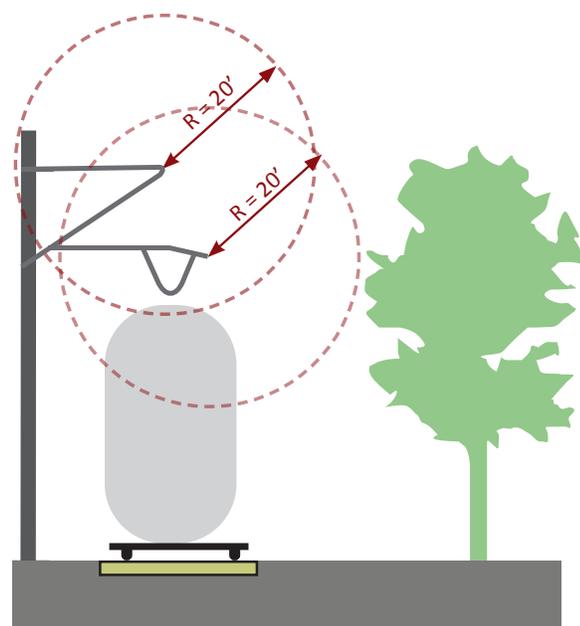


1.4 Overhead Catenary System (OCS) Clearance

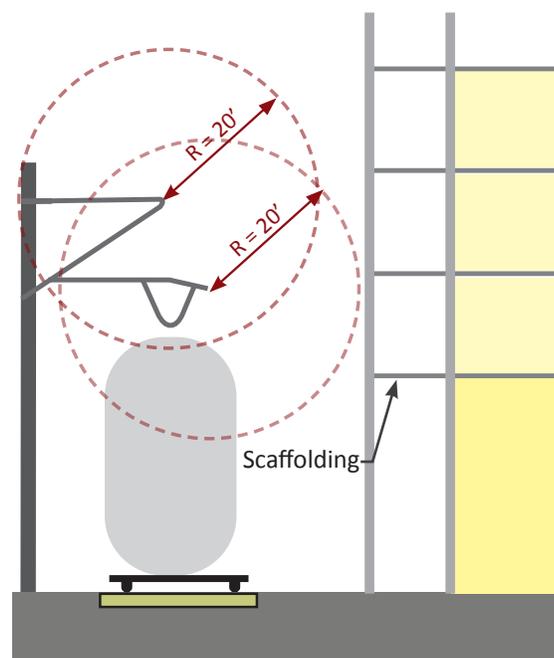
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto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

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

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



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



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

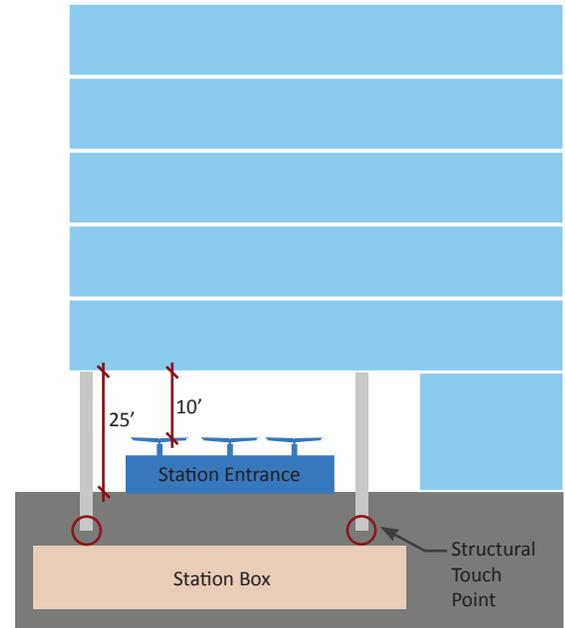
Site Plan & Conceptual Design

1.5 Underground Station Portal Clearance

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

RECOMMENDATION:

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



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



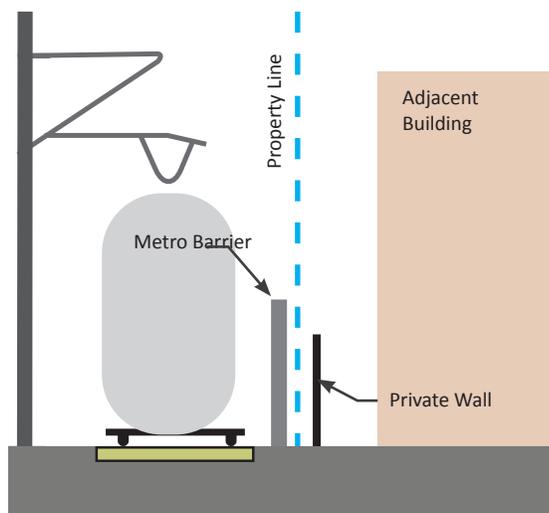
1.6 Shared Barrier Construction & Maintenance

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

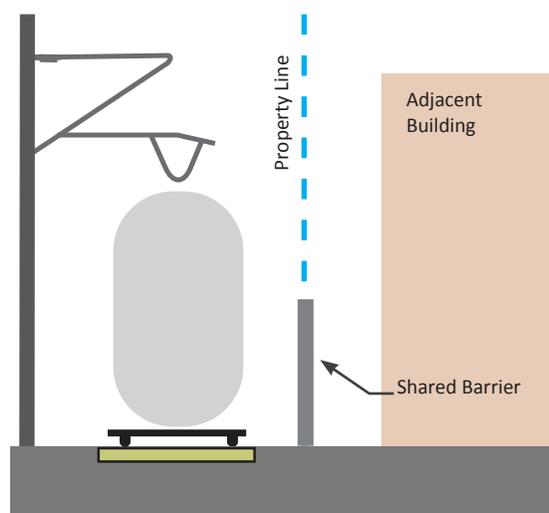
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

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

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



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



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

Site Plan & Conceptual Design

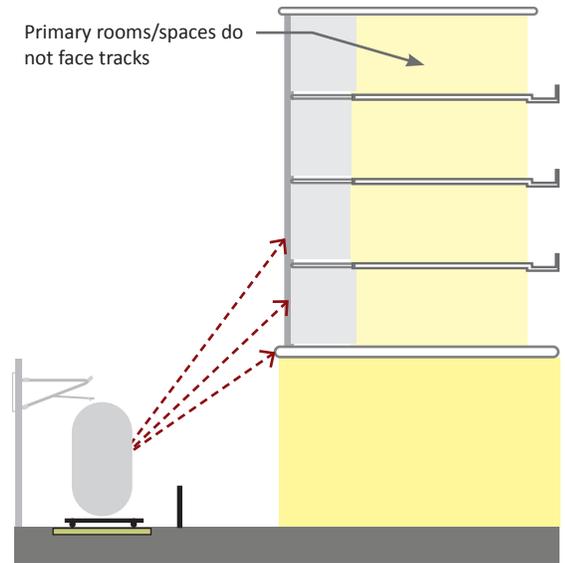
1.7 Project Orientation & Noise Mitigation

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

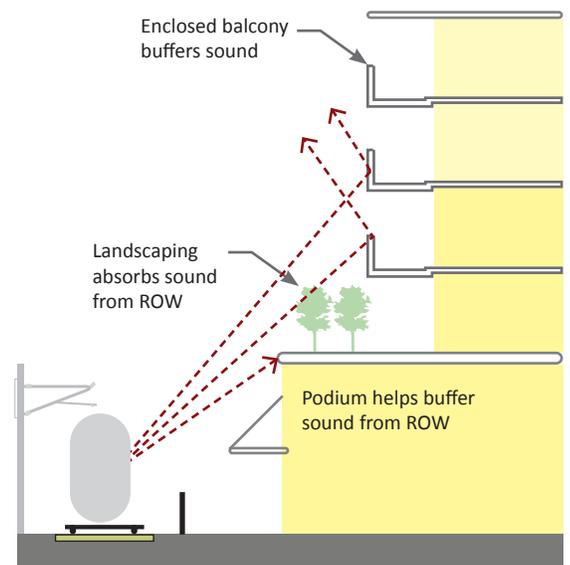
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

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

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



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



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



1.8 At-Grade Rail Crossings

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

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

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



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



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

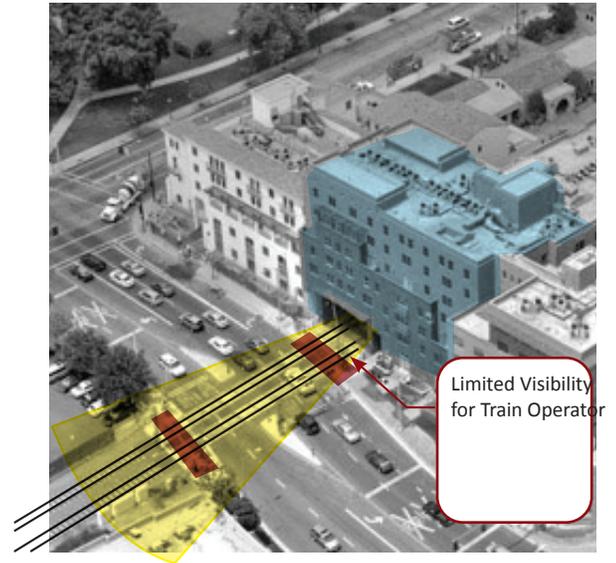
Site Plan & Conceptual Design

1.9 Sight-Lines at Crossings

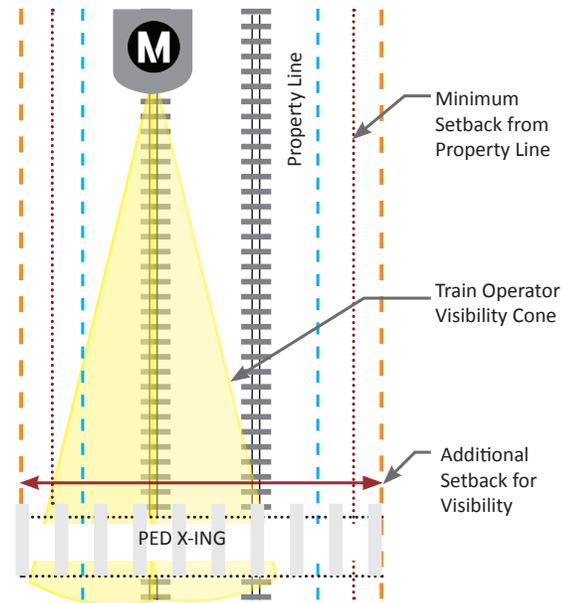
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations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

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

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



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



Visibility cones allow train operators to respond to safety hazards.

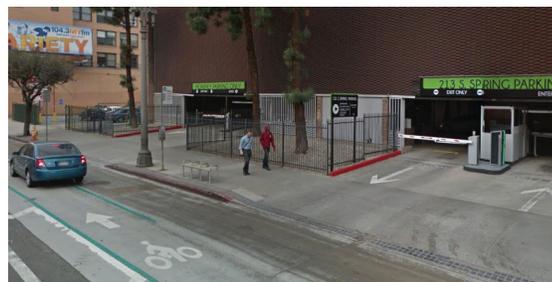


1.10 Driveway/Access Management

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

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

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



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

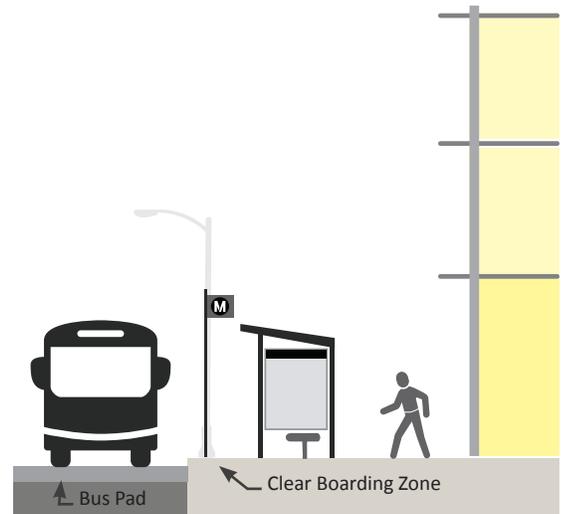
Site Plan & Conceptual Design

1.11 Bus Stop & Zones Design

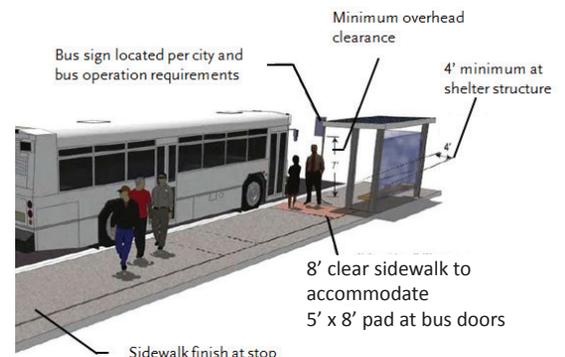
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones.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

RECOMMENDATION: When designing around existing or proposed bus stops:

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



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



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



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GORBEL 2.5
DANGER DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

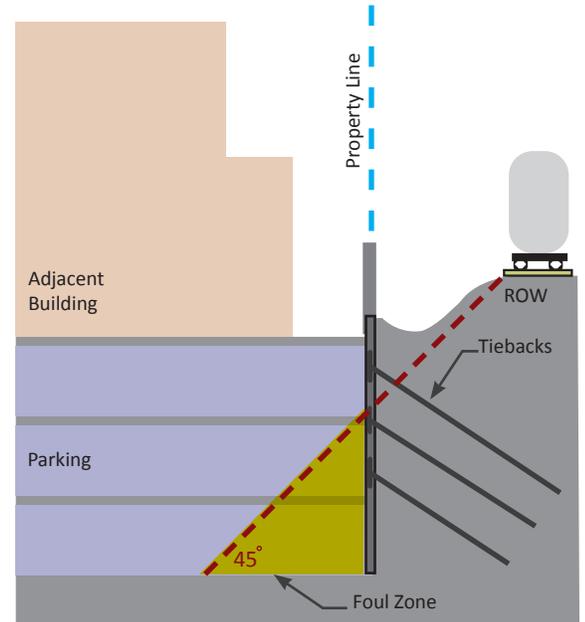
2.1 Excavation Support System Design

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

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

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

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



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



2.2 Proximity to Tunnels & Underground Infrastructure

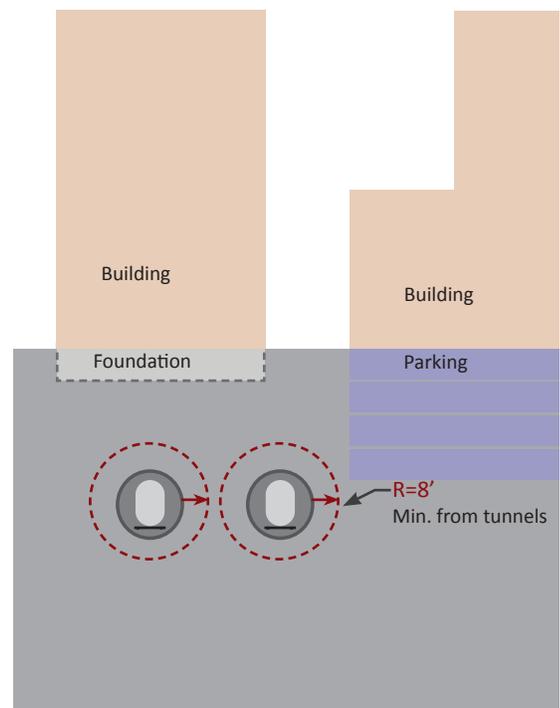
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

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

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

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

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

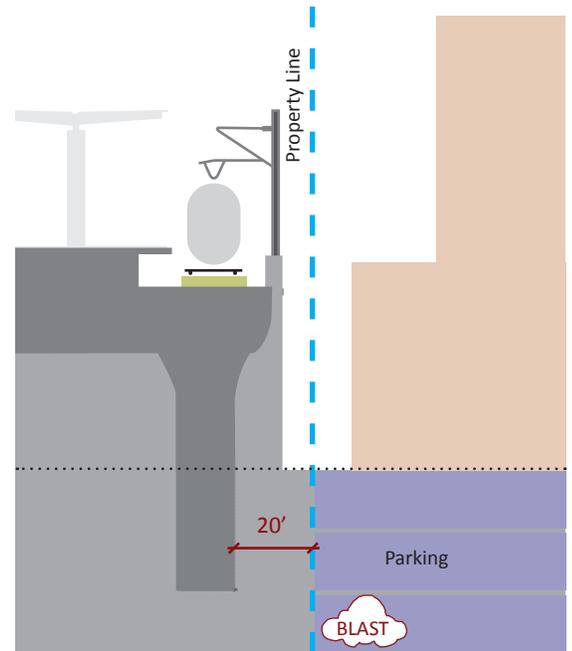


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

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

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



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

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

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

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

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

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

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



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

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

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

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



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

Construction Safety & Management

3.3 Construction Hours

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

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

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



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



3.4 Excavation/Drilling Monitoring

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

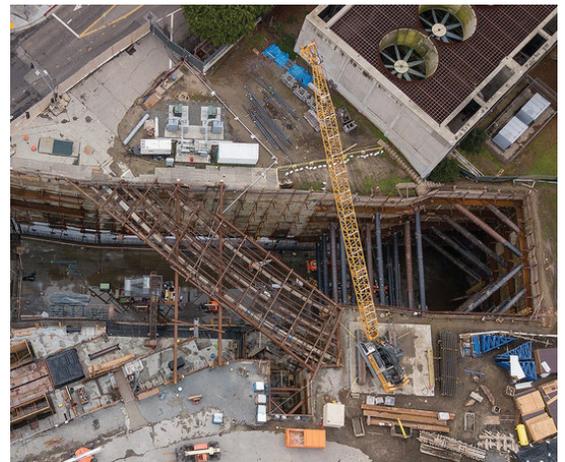
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

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

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



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



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

Construction Safety & Management

3.5 Crane Operations

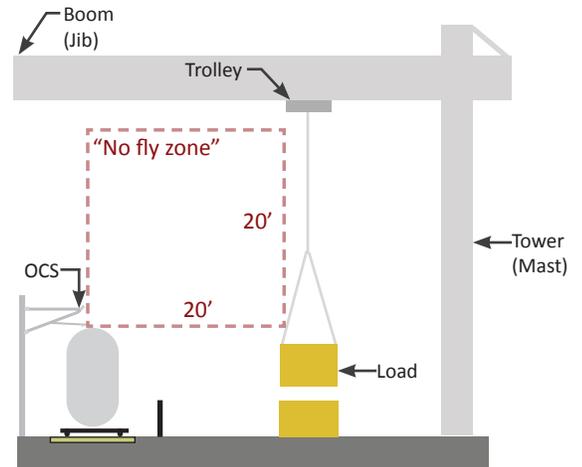
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators,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

RECOMMENDATION:

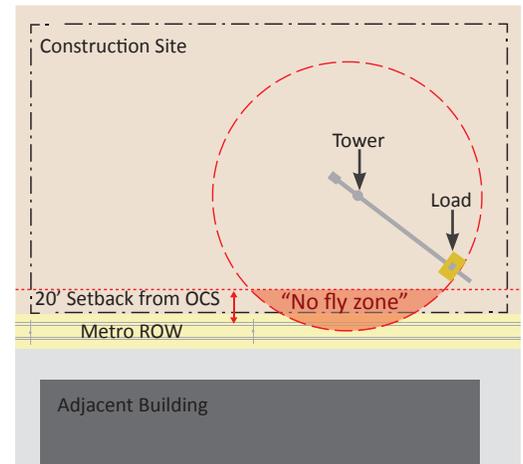
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

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

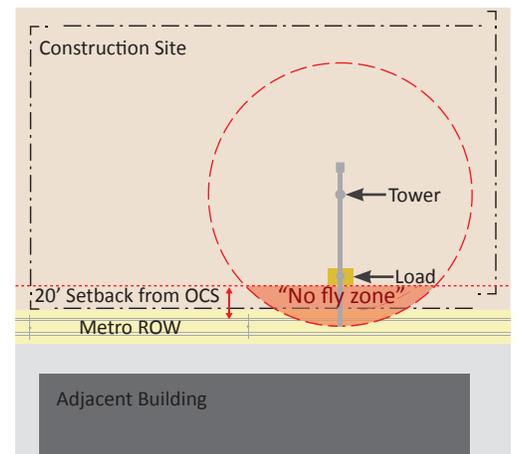
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



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



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



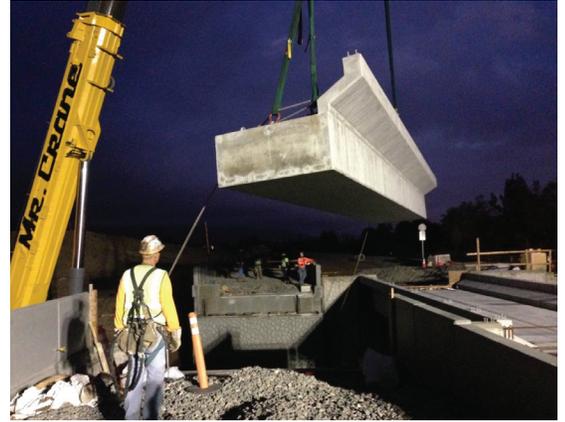
Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.



3.6 Construction Barriers & Overhead Protection

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

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



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



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

Construction Safety & Management

3.7 Pedestrian & Emergency Access

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

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

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



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



3.8 Impacts to Bus Routes & Stops

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

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



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

Construction Safety & Management

3.9 Utility Coordination

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

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

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

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

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



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



3.10 Air Quality & Ventilation Protection

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

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



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

Glossary

Cone of Visibility

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

Construction Work Plan (CWP)

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

Flagger/Flagman

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

Geotechnical Foul Zone

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

Guideway

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

Heavy Rail Transit (HRT)

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

Joint Development (JD)

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

Light Rail Transit (LRT)

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

Measure R

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

Measure M

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

Metrolink

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

Metro Adjacent Construction Design Manual

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

Metro Bus

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

Metro Bus Rapid Transit (BRT)

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

Metro Design Criteria and Standards

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

Metro Rail

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

Metro Rail Design Criteria (MRDC)

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

Metro Transit Oriented Communities

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

Noise Easement Deed

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

Overhead Catenary System (OCS)

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

Right of Entry Permit

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

Right of Way (ROW)

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

Southern California Regional Rail Authority (SCRRA)

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

Threat Assessment and Blast/Explosion Study

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

Track Allocation/Work Permit

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

Wayfinding

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

metro.net/projects/devreview/





Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Liane M. Randolph, Chair

May 20, 2024

Jose Mendivil, Associate Planner, City of Culver City
9770 Culver Blvd.
Culver City, California 90232

Dear Mr. Mendivil,

I am writing to provide comments on the Culver City Draft Environmental Impact Report (DEIR) for the 5700 Hannum Mixed-Use Residential and Commercial Project (Project). The California Air Resources Board (CARB) works to support the State's long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG) impacts of new development during the California Environmental Quality Act (CEQA) process. Specifically, CARB has an interest in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).¹

As noted in Appendix D, Local Actions, of the 2022 Scoping Plan (Appendix D), "[l]ocal government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals." With this in mind, CARB staff submit the following comments regarding the residential portion of this project.

Overall, this project is well aligned with the State's climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. This letter includes two recommendations for further reducing vehicle miles traveled (VMT) and GHG emissions associated with the project.

Many aspects of the project currently align with Scoping Plan Appendix D Attributes

The project's GHG analysis uses thresholds of significance based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. Consequently, one of the thresholds in the analysis (GHG-2) specifies that the project would have a significant impact related to GHG emissions if it would "[c]onflict with any applicable plan, policy or regulation adopted to reduce the emissions of GHGs". As part of this analysis, the DEIR examines the project's consistency with the 2022 Scoping Plan.

The project incorporates many of the recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. For example, the project's reuse of an existing developed site is characteristic of mixed-use development that is consistent with State GHG reduction goals. Table 1 compares the

¹ <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>

project attributes recommended in the Scoping Plan Appendix D, Table 3 to the design features included in the project.

Table 1. Appendix D Project Attributes Comparison Table

Project Attributes from Scoping Plan Appendix D, Table 3	Hannum Mixed-Use Residential and Commercial Project
Does not result in loss or conversion of natural or working lands	The project will redevelop a site within the city limits. No natural or working lands would be converted as a result of the project.
Electric Vehicle (EV) charging meeting most ambitious voluntary CA Green Building Code standard	20% of the residential parking provided will install conduit and panel capacity to accommodate electric vehicle charging stations. 10% of the spaces will be EV-ready and a further 10% will have EV charging stations installed.
Provision of on-site affordable housing	Of the 309 residential units developed by the project, 27 would be Very Low-Income units.
No net loss of existing affordable units	No housing will be removed as a result of the project.
Located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	The project will redevelop an existing two-story office building and associated surface parking. The project site is within the city limits and is surrounded by existing development.
<p>New mixed-use or residential development includes transit-supportive densities, or;</p> <p>New mixed-use or residential development is in proximity to existing transit stops, or;</p> <p>More stringent criteria as specified in applicable SCS</p>	Bus service exists on roadways adjacent to the site, with three bus stops either on or bordering the site. Additional bus lines exist within ¼ mile of the project boundary.
<p>Reduces parking requirements by:</p> <p>Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or</p> <p>Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or</p>	The project would develop 399 parking spaces for use by the residential portion of the project for a parking ratio of approximately 1.3 spaces per residential unit.

For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit	
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Below, CARB provides additional details on some of the more notable features of the project identified in Table 1.

The project has a strong infill component

The project will redevelop a site that is currently occupied by an office building and associated surface parking. The project would construct 309 residential units and approximately 5,600 square feet of retail space, in addition to publicly accessible and common open space. The project site is centrally located within the city and is surrounded by existing development.

The project repurposes a site that consists of uses that are already served by utilities such as water and sewer. Consequently, the project models many of the attributes of an infill project as recommended in Appendix D of CARB’s Scoping Plan. By directing this residential and commercial development to an underused site, the city is also protecting existing natural and working lands that could be threatened by greenfield development.

The project makes good use of existing transit options

Appendix D of the Scoping Plan recommends that new residential projects be developed in proximity to existing or planned transit and consist of transit-supportive densities. The project will develop approximately 138 residential units per acre, which exceeds the minimum of 20 residential dwelling units per acre necessary to be considered transit-supportive.

Additionally, the project is in proximity to transit, and several existing bus lines adjacent to the project site will serve the project. Several more transit alternatives are within ¼ mile of the project site. The availability of transit for project residents can help to reduce overall VMT, with a corresponding reduction in GHG.

Opportunities exist to achieve additional VMT and GHG reductions

As noted above, the project incorporates many design features that are recommended in Appendix D of the State’s Scoping Plan. Furthermore, the DEIR finds that the project’s GHG impacts are less than significant. In addition to the elements already incorporated into the project, CARB identified some potential opportunities to further reduce operational GHG emissions associated with the project.

The project can reduce parking ratios

Appendix D recommends eliminating minimum parking requirements or establishing maximum allowable parking ratios, or supplying residential parking at a ratio of less than one parking space per dwelling unit as an additional project attribute that can reduce VMT

and GHG. For multifamily residential units, Appendix D also suggests that the cost of parking be unbundled from the costs to rent or own a residential unit. The project includes a parking ratio of approximately 1.3 spaces per residential unit, which exceeds the reduced parking recommendations for residential development in Appendix D that are consistent with low VMT and GHG development.

This ratio could lead to VMT above what would be expected with a lower parking ratio. Consequently, a lower parking ratio can help to further limit the project's VMT and GHG emissions. This is especially the case because of the project's proximity to existing transit options. In addition, unbundling parking costs from rental or ownership costs can encourage reduced vehicle ownership with a resulting decrease in VMT.

The project can provide additional EV charging infrastructure for residents

Another key project attribute listed in Appendix D of the Scoping Plan for residential and mixed-use development is the inclusion of infrastructure to promote transportation electrification. Appendix D recommends electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.

The project would install conduit and panel capacity to accommodate EV charging stations at a minimum of 20% of the residential parking spaces. An additional 10% of the parking spaces would be EV-ready and a further 10% of the spaces would be improved with EV charging stations. This would meet the Tier 1 CalGreen voluntary standard.

The project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces.

Conclusion

CARB appreciates the opportunity to review and comment on the DEIR for the 5700 Hannum Mixed-Use Residential and Commercial Project. The project includes many characteristics that are consistent with the 2022 Scoping Plan's recommendations for residential and mixed-use development.

Additional VMT and GHG reductions could also be realized by limiting parking to a maximum of one space per unit for residential development and charging for parking separately instead of bundling that cost in with the cost of rent, as well as by increasing the number of EV charging stations available for residential parking spaces.

CARB would like to commend the city and the project proponent for repurposing an underused site within the city to create a mixed-use development that allows for growth while being largely consistent with California's climate goals for such projects.

Jose Mendivil, Associate Planner
May 20, 2024
Page 5

If you have any questions, please feel free to contact Pedro Peterson at (279) 208-7367 or by email at Pedro.Peterson@arb.ca.gov.

Sincerely,

Annalisa Schilla

Annalisa Schilla, Ph.D., Assistant Division Chief, Sustainable Transportation and Communities Division, California Air Resources Board
Annalisa.Schilla@arb.ca.gov

cc: Pedro Peterson, Manager, Sustainable Transportation and Communities Division,
Transportation & Land Use Planning Branch, Local Planning Section

Jose Mendivil, Associate Planner

May 20, 2024

Page 6

bcc: Jennifer Gress, Ph.D., Division Chief, Sustainable Transportation and Communities Division, California Air Resources Board

Carey Knecht, Branch Chief, Sustainable Transportation and Communities Division, Transportation & Land Use Planning Branch

Matt Jones, Air Pollution Specialist, Sustainable Transportation and Communities Division, Transportation & Land Use Planning Branch, Local Planning Section

Letter IND 1

-----Original Message-----

From: Karyn Marks <karynurse@yahoo.com>

Sent: Monday, May 20, 2024 10:23 AM

To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Mendivil, Jose <jose.mendivil@culvercity.org>

Subject: EIR for 5700 Hannum Avenue Mixed Use Development (309 UNITS)

To All Concerned,

As a resident of Fox Hills, I find it appalling that you would not consider ALL of the projects that you currently have slated for Fox Hills in an EIR for the area.

Since you are planning on "packing Fox Hills with units". The EIR's should be considered as a whole. You know what you are planning!

This is like operating on a patient with a complete disregard for the rest of the body!

You have multiple major projects planned that will impact our traffic, our flow of air, our pollution and you assess them one by one before any of them go up?

Why not a cumulative assessment? You are destroying where we live by putting so many new units and crowding our area way beyond the rest of Culver City.

We will never get out of our driveways when this is completed and our air quality with the 405 right here will be unbearable.

Spread these projects out evenly throughout Culver City.

Stop the discrimination of Fox Hills!

Do a cumulative assessment - That is the correct way to assess the impact on our community. To only look at the impact of 309 units when you are planning 3000 units is deceptive and inaccurate.

Why don't you care? As the City Council, you should care about this!

Stop the discrimination of Fox Hills! We are angry at your disregard for our welfare.

Sincerely,

Karyn Marks

Letter IND 2

From: Jeff Haas <jeff@haasentertainment.com>

Sent: Monday, May 20, 2024 1:08 PM

To: Mendivil, Jose <jose.mendivil@culvercity.org>

Cc: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>

Subject: RE: DEVELOPMENT IN FOX HILLS

Jose,

Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development. These 2 omitted projects (listed above) must be fully analyzed for their impact on the proposed changes to the Fox Hills area streets.

Link to EIR:

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Regards,

Jeff

Jeff Haas | President / C.E.O.

Haas Entertainment
5774 Uplander Way, Culver City, CA 90230

tel: 310.641.4700

jeff@haasentertainment.com
<http://www.haasentertainment.com>

Letter IND 3

May 20, 2024

To Whom This May Concern:

The following are my comments regarding the EIR for the 5700 Hannum Avenue proposed mixed use project:

The EIR is incomplete as it does not address the **Cumulative Impact** of the other two proposed projects in close proximity to the 5700 Hannum Avenue proposed project. Of the 12 related projects listed in the EIR on page 82/Table 3.1, the proposed projects at 5757 Uplander Way and 5730 Uplander Way were not included. These 2 projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue project and their cumulative impact must be fully analyzed for this EIR to have any value in its results.

In addition, there is no documentation about the impact that this project will have on the natural breezes that the 26 residential complexes now have. This issue is important to fully address, as these present complexes do not have central air conditioning. A detailed effect of the blockage that the 5700 Hannum Avenue project will have was missing from this EIR as well. Please address.

Thank you.

Judi Sherman

Fox Hills resident and on the board of the Fox Hills Neighborhood Association.

Letter IND 4

From: Thomas O'Neill <thomasjudo@dslextreme.com>

Sent: Monday, May 20, 2024 5:07 PM

To: Mendivil, Jose <jose.mendivil@culvercity.org>; McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>

Subject: Comments: 5700 Hannum EIR

Re: The Environmental Impact of the 5700 Hannum Project

Is the land made for the people or were people made to serve the land?

Is the EIR to serve the planet or to serve the people living on it?

So much of what has undergirded land use policy for decades in California is pride in saving the environment for the environment's sake. The fundamental notion that the land was made for the people has been set aside.

It is essential to strike a balance in all things, however. So, the question that should be at the front of our collective mind when considering any new development is the effect that it will have ON THE PEOPLE already living in the space that is designated for that development.

There needs be space to move, easy access to essential services, preservation of existing gifts of nature that enhance the lives of the people including the natural flow of clean air, and life-giving air-purifying trees and open space, and basic efficient supplies of water and power to facilitate civilized living.

All these natural gifts and manmade services in balance with the size of the population that they can comfortably support.

The fact that the State has seen fit to block development for decades through the abuse of EIRs, throughout the State, is no excuse for now imposing overdevelopment in areas, like Fox Hills, that are in what has already been considered by the experts to be in line with their own nearer ideal criteria.

The State has tasked our City with creating 3,300 living spaces. And the projects that have been planned THUS FAR would drop 1,700 of those

dwellings in what is already the most densely populated part of our fair city, Fox Hills, thereby destroying a balance that has served the people living here well, for decades.

Why Fox Hills? Why now?

Because it's easy? Because it's cheap? Because it's a fast buck? Because it serves certain vested interests like Amazon, or Apple, or Google?

Why now, when a million people have left California and while thousands of existing units sit vacant, from here to San Francisco?

There must have been considerable thought given to the portion of the proposed essential housing burden imposed on each municipality. But who made the decisions and whose ox was being gored in the making? Whose ideology or pocketbook was being served?

These are of course, to some degree, rhetorical questions.

The mindset of urban planners is well known. "Save the Planet."

And while California remained shut down longer than any other State, who was buying up the shuttered businesses and vacated properties?

All in order to serve whom or what? Certainly not the people who live in Fox Hills or the rest of Culver City for that matter. Certainly not to bring balance where it already exists.

5700 Hannum is a foot in the door, and a slap in the face to the people of Fox Hills. The developers pitch "5700 Hannum" as a transition from the office buildings on Corporate Pointe.

Well, we already have that "transition." A street lined with large trees and other plant life and a quiet, low-density low-rise business park that provides a real transition from the hustle and bustle of the Mall and its neighboring businesses. The developer's "transition" is no transition at all, rather an intrusion.

California is BIG COUNTRY. Plenty of room to live and build. But some of those who have been elected to oversee the quality of life for the rest of us, and too many unelected bureaucrats, have a twisted vision of what that living should be like. Cram as many units into as small a space as possible. Take as many cars off the street as possible. Control where and how people come and go. There's a name for that, and it isn't America.

Gavin Newsom lives in a 12,000 square foot house on an 8.2 acre estate along the American River in Northern California. 6 bedrooms, 10 baths, pool, tennis court, jacuzzi, and wine cave. And that's not including his winery which remained open while he shut others down.

How about some EQUITY, here. Tell the Governor to drop 3,300 units on his 8 acre estate.

That seems a reasonable sacrifice for him to make for the people of Culver City and Fox Hills, a sacrifice by someone who has made none so far.

His mantra and that of the State Houses: Rules for thee but not for me.

Doesn't our City, Culver City, hold a higher moral and ethical standard than that?

Thomas O'Neill

Letter IND 5

From: Angelika <germangie@aol.com>

Sent: Monday, May 20, 2024 10:27 PM

To: Mendivil, Jose <jose.mendivil@culvercity.org>; McMorris, Yasmine <Yasmine-Imani.Mcmorris@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>

Cc: yourfoxhills@fhnacc.org

Subject: 5700 Hannum Ave., Culver City (Incomplete Environmental Impact Report Analysis of Nearby Projects)

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Of the 12 related projects listed in the report link on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, would result in an **additional 1,396 units** in close proximity to the 5700 Hannum Avenue development.

Among utmost concern:

* Utilities (water, power, gas) - Supply & Resulting Pollution ...

We current neighboring residents were already forced to cut back on water usage in recent years, urged to operate appliances during off-hours to prevent outages. Each newly built unit will run A/C's, TV's and electronic devices at minimum, possibly washers, dryers, dish washers, electric vehicle charging stations etc. The resulting detrimental pollution impact also needs to be considered.

* Lack of sufficient parking per project

Most people have to share units to afford rent, so 2-3 occupants /unit would be the anticipated norm. L.A. is too wide spread and its public transportation system under-developed, one even needs a car to get to public transportation. Thus, 2 minimum parking space / unit, plus parking for guests, staff, service personnel, deliveries, commercial space traffic etc. would be needed. Drivers / cars will flood and pollute the entire neighborhood on approach, while circling for parking, and departure. Most alarming to me is that all street parking for us neighbors will be eliminated.

Respectfully,

Angelika Kischnick

5900 Canterbury Dr., Culver City, CA 90230

Letter IND 6A

From: Justin Ciampaglia <justin.ciampa@gmail.com>

Sent: Monday, May 20, 2024 11:22 PM

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

Subject: Re: Culver City Draft EIR comments

Dear City council and city staff,

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page

82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts."

From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."..... We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. Many people to be informed rely on advocacy groups that work for the neighborhood. The spirit of the law is not met with 500 ft. We must have at least 2000 ft notice requirement to make sure everyone affected by the change is notified. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. The city can protect the residents facing the highest disproportionate burden from population density in our City.**

Thank you,

Justin Ciampaglia

Letter IND 6B

From: Justin Ciampaglia <justin.ciampa@gmail.com>
Sent: Tuesday, May 21, 2024 1:13 PM
To: Mendivil, Jose <jose.mendivil@culvercity.org>
Subject: Re: Culver City Draft EIR comments:

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

A day-care Montessori school may still be in operation at Heather Village Condos and trigger the requirement Impact HAZ-3:

Emit Hazardous Materials Within One-Quarter Mile of a School (Impact HAZ-3): The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one mile of a school.

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox

Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts."

From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."..... We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. Many people to be

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Thank you,

Justin Ciampaglia

Letter IND 7A

From: Tanya Ihnen <tanyaihnen@gmail.com>

Sent: Monday, May 20, 2024 3:05 PM

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

Subject: Concern with developments surrounding Fox Hills

Dear City council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. Not the law number, but in words that a common person can understand. The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City **MUST** do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City **MUST** do a new study w/ all the current projects. Not partial list. **HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?:** Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the

proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."..... We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Tanya Ihnen

Fox Hills resident

Letter IND 7B

From: yumihomes@icloud.com <yumihomes@icloud.com>

Sent: Monday, May 20, 2024 3:05 PM

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

Subject: 5700 Hannum Ave - EIR response and message to City Council, please read

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. Not the law number, but in words that a common person can understand. The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE

REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

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5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Yumi Mandt-Rauch

Fox Hills Resident

Letter IND 7C

From: Eurana High <euranahigh@gmail.com>

Sent: Monday, May 20, 2024 3:37 PM

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

Subject: Fox Hills

Dear City council and city staff,

For City Council and city staff:

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3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity." We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Eurana High

Fox Hills resident

Letter IND 7D

From: irene french <ifrench29@yahoo.com>

Sent: Monday, May 20, 2024 3:16 PM

To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; dan.obrein@culvercity.org <dan.obrein@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; goran.eriksson@culvercity.org <goran.eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>

Subject: Fox hills project

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. Not the law number, but in words that a common person can understand. The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not

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6. Lower height for every building. Do not exceed existing building height.

Irene French

Fox Hills resident

Letter IND 7E

From: Gabriel Parhoti <gparhoti@gmail.com>

Sent: Monday, May 20, 2024 9:30 PM

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

Subject: Concern from Fox Hills (Gabriel Parhoti)

Dear City council and city staff,

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Gabriel Parhoti

Fox Hills resident

Appendix B
**Draft EIR Public Meeting
Materials**

PUBLIC MEETING ON THE DRAFT EIR

5700 Hannum Avenue Mixed-Use
Residential and Commercial Project

April 30, 2024
7:00 p.m. – 8:00 p.m.



Culver CITY
PLANNING DIVISION

Draft EIR Meeting Objectives

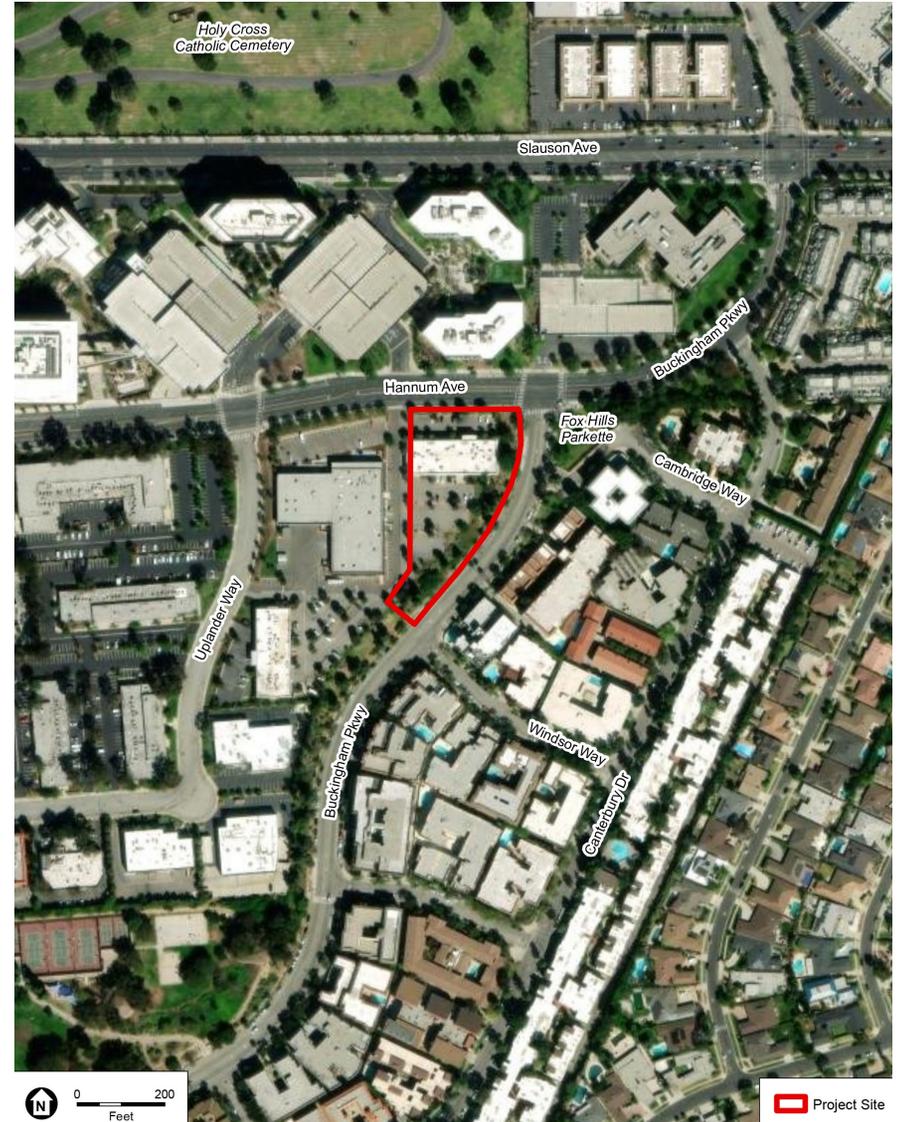
- Provide information about the 5700 Hanum Avenue Mixed-Use Residential and Commercial Project
- Provide information on the CEQA process
- Identify the environmental topics evaluated in the Draft EIR
- Summarize impact findings provided in the Draft EIR
- Provide instructions on how to submit comments on the Draft EIR

All written comments received on the Draft EIR will be responded to in writing in the Final EIR.



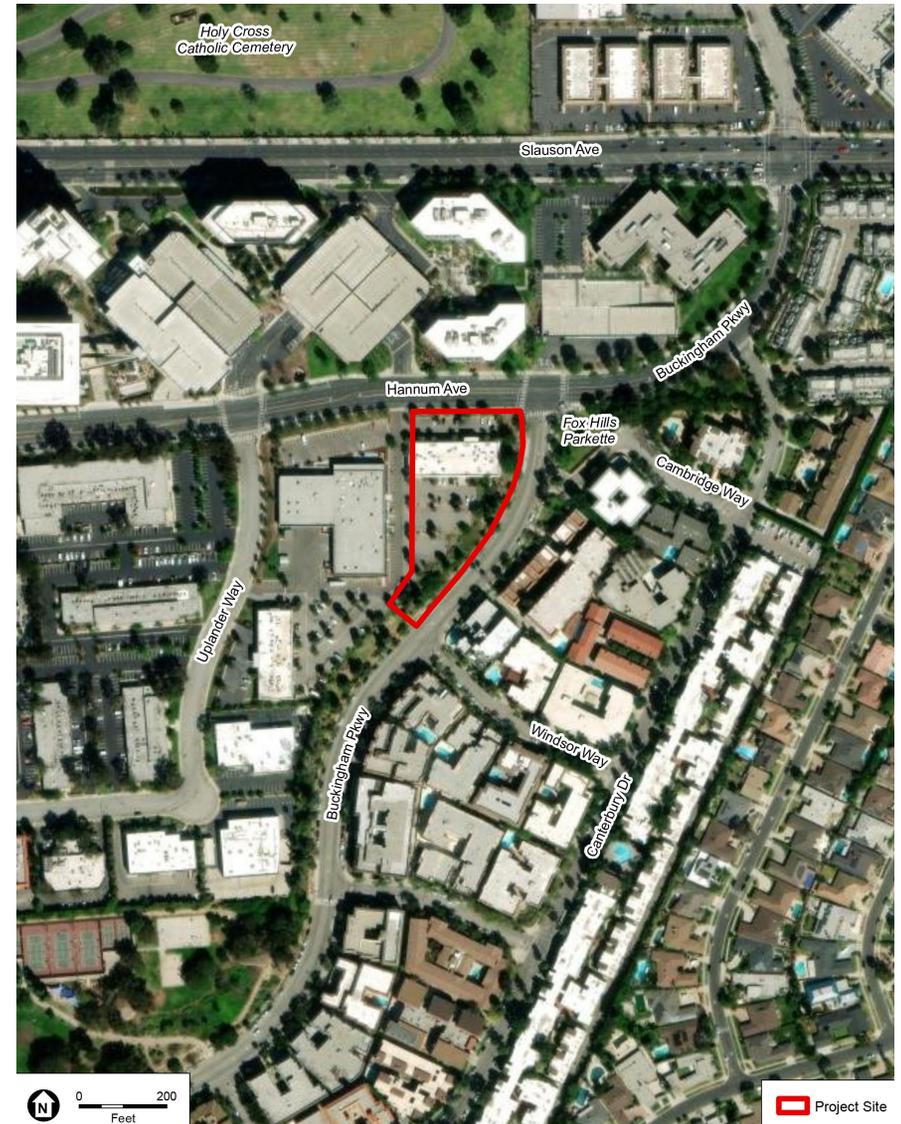
Project Site and Vicinity

- Project Site:
5700 Hannum Avenue in Culver City, California, 90230
- 2.23-acres (97,264 square feet)
- Bounded:
Hannum Avenue (North)
Buckingham Parkway (East/SE)
Existing commercial uses (West)
- Primary regional access:
I-405 Freeway 0.7 mile west



Existing Conditions

- Fully Developed
- Existing 30,672 square foot, 2-story office building.
- Surface Parking & On-Site Landscaping.
- Adjoining sidewalks are landscaped with street trees.

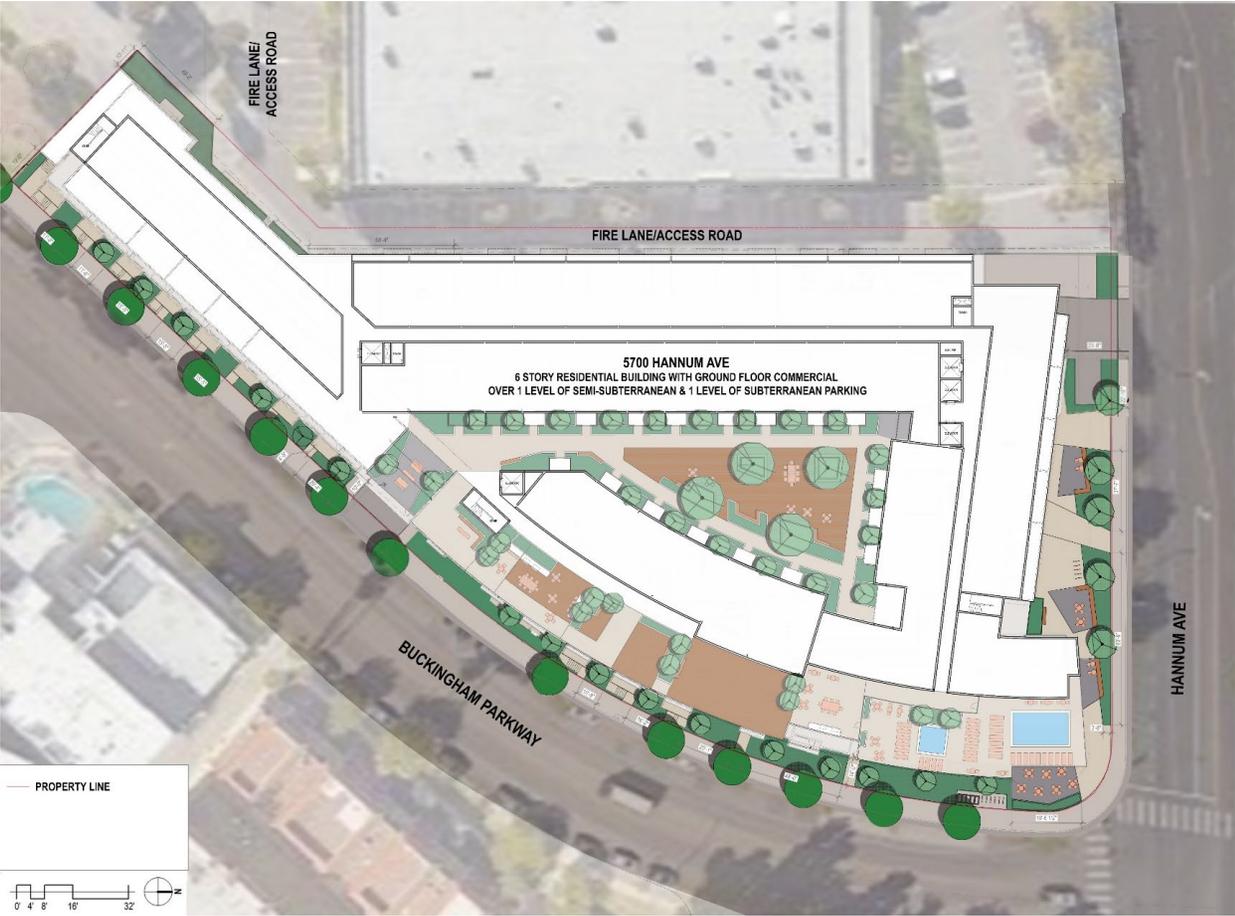


Project Description

- New 6-story, mixed-use building over two (2) semi-subterranean levels.
- 309 residential units (including 27 Very Low-Income units)
- 5,600 square feet of retail space.
- Building height
 - 70 feet along north property line adjacent to Hannum Avenue
 - 71 feet at the south property line along Buckingham Parkway.
- 7,507 square foot publicly accessible open space area (Hannum Plaza).
- Two primary driveways:
 - Buckingham driveway for residential use
 - Hannum driveway for resident, retail, delivery uses.
- 428 on-site vehicle parking spaces & 92 bicycle parking spaces.



Conceptual Site Plan



North Elevation



View looking south from Hannum Avenue

East Elevation



View looking west from Buckingham Parkway

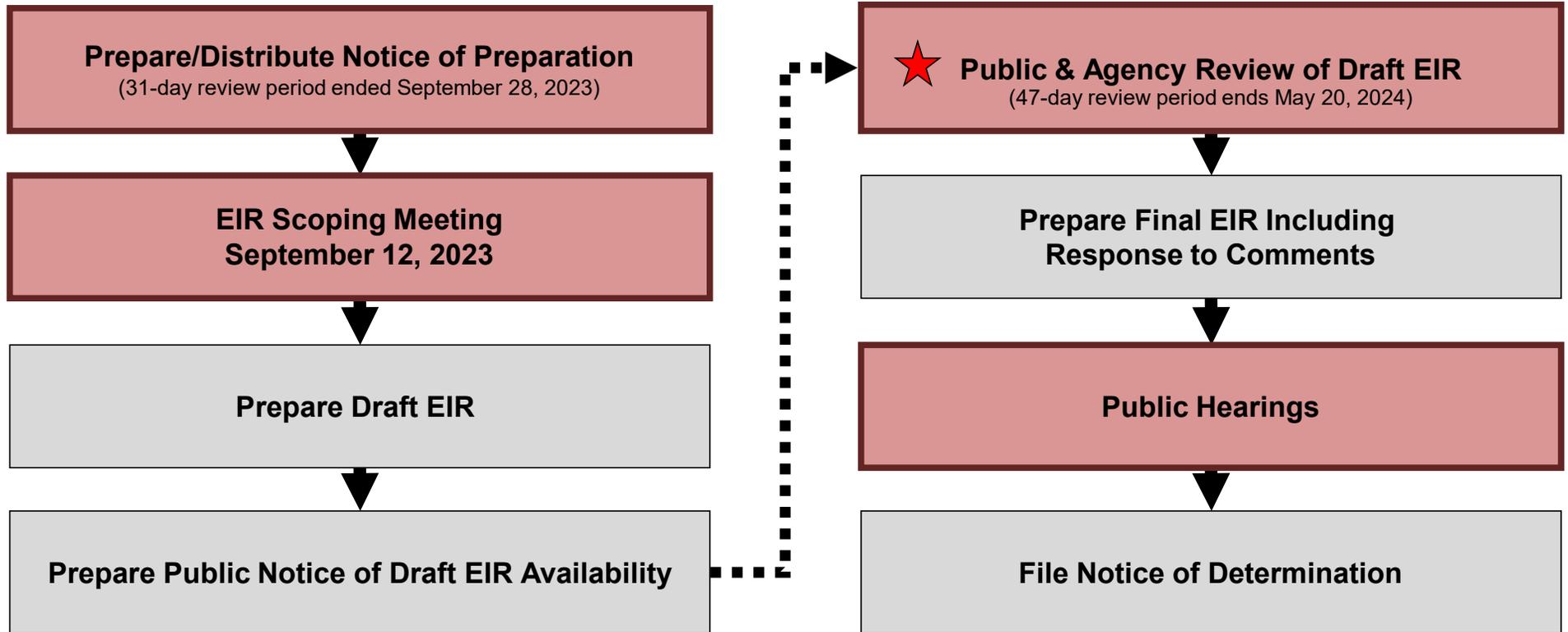
California Environmental Quality Act (CEQA)

Purpose of CEQA Review:

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



The EIR Process



 = Opportunities for Public Input

 = We are here in the process



Topics Not Evaluated in the Draft EIR

Topics Found to have no impacts or less than significant impacts in Initial Study

- Agriculture and Forestry Resources
- Biological Resources
- Hazards & Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Utilities and Service Systems (Telecommunications, Wastewater and Solid Waste)
- Wildfire



Topics Analyzed in the Draft EIR

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources only)
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services (Fire and Police Protection, Schools, and Parks/Recreation)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Water Supply, Electricity and Natural Gas Facilities)



Draft EIR Topics with Less than Significant Impacts

- Aesthetics
- Air Quality (Operation)
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise and Vibration
 - Operational Noise
 - Construction/Operation Vibration
- Population and Housing
- Public Services
(Fire and Police Protection,
Schools and Parks/Recreation)
- Transportation
- Utilities and Service Systems –
Water Supply, Wastewater, Solid
Waste, Electricity and Natural
Gas Facilities



Draft EIR Topics with Significant Impacts Requiring Mitigation Measures

After implementation of Mitigation Measures, impacts for these topics were reduced to less than significant levels:

- Air Quality – Construction Related Emissions
- Cultural Resources – Archaeological Resources
- Geology and Soils – Paleontological Resources
- Tribal Cultural Resources



Draft EIR Topics with Significant and Unavoidable Impacts – Construction Related Only

After implementation of Mitigation Measures, impacts for these topics were still significant and unavoidable:

- Noise – On-Site Construction Noise
 - Significant and unavoidable impact would occur during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction only if these construction activities occurred outside of the City’s allowable construction hours and an extended hours construction permit was not obtained.
 - However, the construction noise impact would be less than significant if an extended hours construction permit is obtained.



Draft EIR Availability

The Draft EIR is currently available at the following locations:

- Online at: <https://www.culvercity.org/Active-Projects/5700-Hannum-Ave-Proposed-Project>
- In-person at: Culver City Current Planning Division counter

Current Planning Division Office, City Hall, Second Floor
9770 Culver Boulevard
Culver City, CA 90232-0507

Business hours are 7:30 A.M. – 5:30 P.M., Monday through Friday, except alternate Fridays

Telephone in advance to assure staff availability at (310) 253-5710

- In-person at: Culver City Julian Dixon Library (see library website for address and hours of operation)



Submittal of Public Comments on the Draft EIR

 **Due date for public comments on the Draft EIR:**  **Please direct public comments on the Draft EIR to:**

5:30 p.m. on Monday, May 20, 2024

Jose Mendivil, Associate Planner
City of Culver City Planning Division
9770 Culver Boulevard
Culver City, California 90230

 **Reference:**
*5700 Hannum Avenue Mixed-Use
Residential and Commercial Project Draft
EIR*

Email: jose.mendivil@culvercity.org



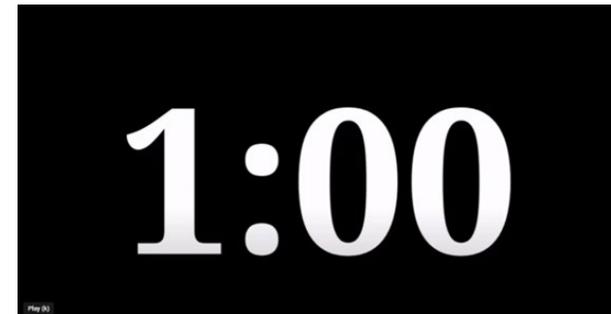
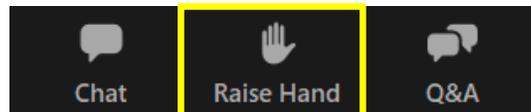
Public Comment Period

Oral Comments:



Zoom

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



By Phone

- Dial ***9** to raise your hand and ***6** to unmute

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



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