

MEETING DATE: 8/12/13

AGENDA ITEM: Adoption of a Resolution Transmitting to the County of Los Angeles the Official City Response to the June 2013 Initial Study/Mitigated Negative Declaration for the Proposed Stoneview Nature Center Project located at 5950 Stoneview Drive.

ATTACHMENTS

	<u>Pages</u>
1. Proposed Resolution, including Exhibit A containing detailed comments on the June 2013 MND.	1-14

RESOLUTION NO. 2013-R__

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, TRANSMITTING TO THE COUNTY OF LOS ANGELES, THE OFFICIAL CITY RESPONSE TO THE JUNE 2013 INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE PROPOSED STONEVIEW NATURE CENTER PROJECT LOCATED AT 5950 STONEVIEW DRIVE.

WHEREAS, the County of Los Angeles ("County") is proposing the Stoneview Nature Center Project located at 5950 Stoneview Drive (the "Project"), within the boundaries of the City of Culver City; and,

WHEREAS, the Project consists of the construction of a 4,000 square foot, one-story building with a multi-purpose room, staff office, restrooms, and terrace with an observation area on a five-acre property. A trail would connect the one-story building to various outdoor elements including an interpretive signage area, a botanical garden, nature grove, yoga deck, native garden area, demonstration/community garden, seating area, passive meadow, and an exercise area. Access to the Project is proposed off of Stoneview Drive. A total of 61 parking spaces on a surface parking lot will be provided with a gate that separates a small 16-space parking area from a larger 45-space parking area; and,

WHEREAS, the County has prepared an Initial Study/Mitigated Negative Declaration ("MND") dated June 2013 to analyze potential environmental impacts caused by the proposed Project, which was released for public review and comment on June 24, 2013; and,

1 WHEREAS, a City staff team, consisting of various City Departments was
2 established to evaluate and comment on the adequacy of the MND in addressing potential
3 impacts to Culver City; and,

4 WHEREAS, the City Council of the City of Culver City, accepted public
5 comments and considered the MND at a public meeting on August 12, 2013.

6 NOW, THEREFORE, the City Council of the City of Culver City, California,
7 DOES HEREBY RESOLVE as follows:
8

9 1. Establishes that this Resolution, including attached Exhibit A,
10 constitutes the City of Culver City's official comments on the MND that was prepared for
11 the Project.

12 2. Directs and authorizes staff to transmit the City's comments on the
13 MND to the County.

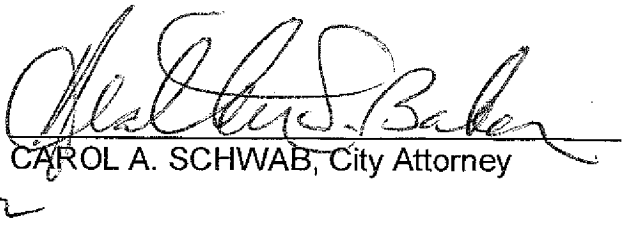
14 APPROVED and ADOPTED this _____ day of _____ 2013.
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18 _____
19 JEFFREY COOPER, MAYOR
City of Culver City, California

20 ATTEST:
21

APPROVED AS TO FORM:
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23 _____
MARTIN COLE, City Clerk

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CAROL A. SCHWAB, City Attorney
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A13-00502

EXHIBIT A - CITY OF CULVER CITY RESOLUTION NO. 2013- R0____
Stoneview Nature Center Project
Draft Initial Study/Mitigated Negative Declaration Comments
(5950 Stoneview Drive, Culver City, California)
August 12, 2013

TRAFFIC /PARKING

1. Traffic Study is Necessary: The proposed project, located at 5950 Stoneview Drive in the City of Culver City, includes demolition of the existing structures and the construction of a 4,000-square-foot one-story building that will include a multi-purpose room, staff office, restrooms, and a terrace and observation area (the "Project"). A total of 61 parking spaces will be provided in a surface parking lot with a gate that separates a small 16-space parking area from a larger 45-space parking area. Access to and from the Project site will be from Stoneview Drive. Figure 2-3 shows a future trail connection with the Park to Playa Regional trail system.

The City's review indicates the traffic and transportation portion of the Initial Study/Mitigated Negative Declaration ("MND") dated June 2013 is inadequate. A traffic study must be conducted according to Culver City's Traffic Study Criteria for the Review of Proposed Development Projects Within the City of Culver City, July 2012. The traffic study and the MND must identify potential significant impacts during construction and the potential impacts of the completed Project. Additionally, when studying potential project traffic impacts, it is critical to make the correct assumptions regarding traffic generation.

2. Trip Generation: The MND on Page 3-4 indicates that in the baseline year there were about 231 daily trips. Table 4.16-1: Vehicle Trips- School Site vs. Proposed Nature Center shows a comparison of the School in 2010 and the Proposed Nature Center in 2014 with 0.2% increase in vehicle trips from 2010 to 2014. The daily trip generation numbers in the MND were obtained using the CalEEMod air emissions model. The MND's comparison of the project's traffic generation to the previous use is not relevant to the potential traffic impact of the Project. According to Culver City's Traffic Study Criteria, Page 7, *Trip credits may be approved for an existing land use if the use was in operation at the time the base year traffic counts were taken.* As such, no credit is allowed for the previous school use because it is no longer in use and has not been since 2010. Therefore, all the traffic generated by the Project is considered new traffic.

Based on the City's experience with the nearby Baldwin Hills Scenic Overlook in Culver City, this Project may well generate much more traffic than would be expected using the CalEEMod air emissions model or the standard trip

generation rates in the publication, Institute of Transportation Engineers (ITE) Trip Generation Manual. As shown in the Conceptual Site Plan in Figure 2-3, the Project will provide a "Future Trail Connection." This connection will be part of a 13-mile Park to Playa system of parks and trails connecting the Stocker Corridor, Ruben Ingold Park, Norman O. Houston Park, Kenneth Hahn State Recreational Area, the Baldwin Hills Scenic Overlook, Culver City Park and the Ballona Creek Bike Path to the beach. For unique uses such as this Project, Culver City requires site-specific trip generation data. Accordingly, the traffic study and MND should develop site-specific trip generation rates using the traffic generated by the Baldwin Hills Scenic Overlook and other similar uses, if available, to apply to this Project. The Baldwin Hills Scenic Overlook generates high daily and weekend traffic volumes and heavy parking demand by hikers and people wanting a challenging workout. This Project has the potential to generate similar automobile traffic and a high parking demand by both visitors to the Project site and by those en route to the Park to Playa trail system. The traffic study and MND should include the amount of traffic the Project would generate on weekdays and weekends, including daily, AM and PM trip generation rates.

It is unclear how the County estimated the projected number of daily visitors (referenced on page 2-2, Table 2-1). The number of visitors to the State Park Scenic Overlook on Jefferson Boulevard should be considered when calculating this number given the potential attraction of a large number of visitors to this site for the purpose of accessing the trail network that connects to the Project site.

3. Trip Assignment: The traffic study and MND should analyze alternate routes via La Cienega Boulevard on/off ramps and the bridge to Kenneth Hahn State Recreational Area for construction vehicles and for permanent access to and from the Project site. It is noted that the alignment of the future trail system crosses the bridge to the Kenneth Hahn State Recreational Area and follows an existing dirt road that connects to the south side of the Project site. Use of this route would avoid Project generated traffic from traversing and potentially impacting several residential streets in the Blair Hills community. The Blair Hills community should have an opportunity to learn the pros and cons of having alternative access from the south and weigh in on the alternatives.
4. Potential Impacts to the Residential Streets in Culver City: Stoneview Drive, the proposed main access to the site, is a narrow residential street with 25 feet, 10 inches between curbs. There are segments along Stoneview Drive where parking is allowed on both sides of the street, leaving about 10 feet of roadway, which is insufficient to accommodate two-way traffic. This causes motorists to pull over to let a car pass in the opposite direction. The Project will generate additional traffic and potentially additional parking on Stoneview

Drive exacerbating a difficult condition. The traffic study and MND should identify the amount of traffic the project would add to Stoneview Drive and the other affected local residential streets. Using Culver City's Traffic Study Criteria, the traffic study should determine if the Project's additional traffic can be accommodated on Stoneview Drive, and if the additional traffic would have a significant impact on Stoneview Drive and the other affected local residential streets. Similar to the traffic generated by Baldwin Hills Scenic Overlook, the Project has the potential to generate traffic by park visitors as well as a significant amount of traffic by hikers and people wanting a challenging workout. The sidewalks on both sides of Stoneview are 4 feet wide. If hikers and other visitors to the park site walk two abreast or more along Stoneview Drive, they would walk in the street and interfere with automobile traffic. The traffic study and MND should indicate potential traffic calming measures to address the increase in traffic on the residential streets, including limiting or eliminating access to the trail network from the Project site should significant traffic and parking problems materialize. Preferential or permit parking is not a desirable solution as it will tend to push the problem deeper into the neighborhood and will inconvenience the residents and overtax the Culver City Police Department who has responsibility for parking enforcement.

5. Speeding is a Concern in the Neighborhood: Speeding has been an ongoing concern in the neighborhood, and in particular on Stoneview Drive because of its narrow roadway width and narrow sidewalks. The traffic study and MND should address this concern and the potential for the Project to attract motorists who are not familiar with the neighborhood. The traffic study and MND should indicate potential traffic calming measures, including speed humps, to slow traffic on the residential streets, particularly on Stoneview Drive.
6. Potential Impacts on Parking in the Neighborhood: There is the potential for a significant parking demand on the nearby residential streets by users of the Park to Playa Regional trail system in addition to the parking demand generated by the proposed Project. To consider this additional parking demand, the traffic study and MND should specify the parking locations along the Park to Playa Regional trail system, and estimate the amount of parking that will be generated at the Project site by users of the Park to Playa trail system in addition to the users of the Project site. It has been the City's experience that parks and trails generate parking on nearby streets when the parking lots are full or if there is a charge for parking on the site. The County's presentation indicated that on-site parking for the Project will be free of charge. The traffic study and MND should indicate mitigation measures to reduce or eliminate park visitors from parking on the nearby local residential streets. These measures should include closing access to the regional trail

from the Project site should parking demand routinely exceed the supply available at the Project site, and/or providing free parking at the new parking lot in Kenneth Hahn Park that will be developed as part of the Park to Playa trailhead. The County's presentation also indicated that a Traffic/Parking Mitigation Fund would be established. The traffic study and MND should indicate the source of funds and how the funds will be accessed to effectuate traffic mitigation. The County's presentation also indicated that there will be quarterly reviews of the traffic/parking concerns. Culver City will require quarterly reports for the first year and annually after the first year. The traffic study and MND should indicate who will conduct the follow-up reports, and that they will be provided to the City of Culver City. The traffic study and MND should indicate any necessary follow-up mitigation measures and that the County is responsible to mitigate the impacts.

7. Preferred Alternate Site Access: In order to mitigate traffic through the residential neighborhood, alternate access to the Project site from La Cienega Boulevard and the bridge to Kenneth Hahn State Recreational Area should be considered, analyzed and discussed in the MND.
8. Parking Calculation: The MND does not adequately justify nor does it explain what calculation was used to derive the number of parking spaces that are being proposed. It is unclear if the ratio is based on building size or other criteria. The parking proposed must anticipate usage of the new 4,000 square foot building as well as all outdoor activities at the Project site, any special events or programming anticipated at the Project site, and the high potential that users of the Park to Playa Regional trail system will use the Project site as a trailhead to access the trail system.
9. Parking Lot Design/Configuration: Due to a lack of information or explanation in the MND, it can only be assumed that the 16 space parking area is intended for normal park use and the 45 space parking area is planned for use primarily for special events or overflow parking at the Project site. This information as to how the parking lot will be operated is critical to be included in the MND as there will be potentially significant parking impacts and the public needs to know how these impacts will be minimized or eliminated. Separating the parking lots with a gate may further impact the situation rather than be beneficial. The proposed use and reason for the two separate parking areas as opposed to one bigger parking area is not explained or analyzed at all in the MND.
10. Other Traffic/Parking Issues: More detailed information is needed about use, criteria and any contingencies for the \$100,000 traffic mitigation fund (What if the fund is not enough to cover the costs of studies and any physical improvements due to Project impacts?); the operation of the shuttle system

(How often does it run? What is the route? Is there a shuttle stop within the Project site or will it stop on the street?); and follow-up traffic and parking studies that the County promised to the community at earlier workshops, as this information is not memorialized in the MND. Some of these promises, if intended to "mitigate" an impact should be identified as a mitigation measure in the MND. And even if it is not intended to mitigate an impact, it should still be discussed and identified in the MND as a requirement of the Project. CEQA documents need not only contain mitigation measures. It can contain conditions of approvals, code and development standard requirements, and policies that also help minimize or alleviate potential impacts.

CONSTRUCTION IMPACTS

11. Potential Impacts During Construction: The MND indicates the demolition of the existing facility is expected to take two to three months and the construction is anticipated to take 13-15 months. The traffic study and MND must identify potential impacts on traffic during construction and potential mitigation measures. The MND does not indicate any staging plans or routes that trucks will take during construction. The likely route will be through Wrightcrest Drive, Lenawee Avenue and Stoneview Drive which could potentially have significant impacts to the residents if not mitigated such as parking, noise, and traffic. The traffic study and MND should include a construction management plan, including the haul route, the number of construction vehicles and where construction workers will park and the construction staging location. The traffic study and MND must indicate that the County shall be responsible to repair any damage to streets in Culver City caused by construction vehicles or activities. Culver City will conduct a before and after evaluation of the streets to determine the level of impact to the streets caused by heavy construction traffic.
12. The MND acknowledges that the Project potentially will have a negative impact of vibration intrusion caused by trucks hauling building materials to construction sites where the haul routes pass through residential neighborhoods on streets with bumps or potholes. However, the suggestion that the City should take action and expend its resources to repair existing bumps and potholes to alleviate this problem is an inadequate and improper mitigation measure for an impact created by the County's Project. As a result, the MND fails to address this potentially significant impact and should be revised and recirculated.
13. Construction Hours: It is not clear in the MND what construction hours the County will follow—whether they will follow Culver City's construction hours or the County's. In addition to the City's hours of construction for developments in the City, the City further prohibits dirt hauling and construction material

delivery or removal during the morning (7:00am to 9:00am) and afternoon (4:00pm to 6:00pm). In order to minimize potential impacts to the residents adjacent to the Project site, the City strongly recommends the County incorporate the City's construction hours and restrictions on delivery and removal as mitigation measures in the MND and/or conditions of Project approval. Also, a point person or ombudsman should be appointed by the County to deal with construction related complaints.

14. Geotechnical Report: Also, it is unclear whether construction activities, which may generate heavy vibrations, will disturb the area in the northwest corner of the Project site that has been designated as a landslide hazard zone. A detailed discussion of this should be included in the MND and in a geotechnical report. The geotechnical report should be appended to the MND.

OTHER AREAS OF CONCERN

Section 2.2.2 - Proposed Buildings and Facilities.

15. The Project description does not include the total acreage for the Project site. It estimated that this area is five acres.

Table 2-1: Project Number of Daily Visitors.

16. The method of estimating the number of daily visitors should be explained in the document.
17. The MND fails to estimate the number of visitors to the Project site during peak hours.
18. The total weekly number of visitors is incorrect; it should be 1050, not 1025.
19. Based on Section 2.2.4, the Project site will be available to the public from dawn to dusk. During the summer months, dawn to dusk occurs earlier and later than 8:00 a.m. to 5:00 p.m. Reasonable hours to assume from dawn to dusk during the summer would be 6:00 a.m. to 8:00 p.m., which would add an additional 5 hours per day. The total hours per day would increase from 9 hours to 14 hours and the total hours per week would increase from 63 hours to 98 hours. This would then increase the number of visitors by a factor of $98/63 = 1.56$ over the number estimated in the MND.

Figure 2-1: Project Location Map

20. The scale of this map is closer to 1"=300', not 1"=200'.

21. Based on the current Assessor's Map, Baldwin Hills Regional Conversation Authority ("BHRCA") owns a 1.0 acre parcel that is contiguous to the east side of the Project site as well as other parcels abutting the Project site. Any BHRCA owned property surrounding the Project site should be identified in the MND. Knowing the locations of these properties could influence the responses concerning the mitigations to the proposed Project.

Section 4.1 Aesthetics

22. Lighting Impacts: There is no mention of the type, height, and intensity of outdoor or exterior lighting proposed as part of this Project that might cause glare in the evening. There needs to be assurances in the MND that any lighting or glare from the lighting shall be shielded sufficiently so as to prevent impacts to the residents in this neighborhood. The City should be given an opportunity to review a lighting plan in order to ensure that its residents are adequately protected from Project lighting impacts.
23. Landscaping: It is unclear in the MND how there will be a "buffer" area between residences and the Project site. What types of trees are proposed? How tall will they be at planting? How long will they take to mature? The City should be given an opportunity to review a landscaping plan in order to ensure that its residents are adequately protected from Project visual and noise impacts.

Section 4.6 Geology and Soils

24. The MND states that two-thirds of the Project is located within the Alquist-Priolo Earthquake Fault Zone. Because a geotechnical report was not provided as part of the MND and a summary or discussion of the conclusions or findings of the geotechnical report was not provided in the MND regarding the Alquist-Priolo Zone, it is unknown how this potentially significant impact is addressed. A geotechnical report and boring explorations should be undertaken to determine the location of this fault. The report should address any mitigation factors that may need to be implemented for the design of the Project, during construction of the Project, and after completion of the Project. A major concern in constructing buildings and landscape areas within an earthquake fault zone is the future settling of the ground due to increase loads and watering within the fault zone area.

Section 4.8 Hazards and Hazardous Materials

25. The MND indicates that oil drilling was highly active at the Project site between 1928 through 1948, but hazardous wastes from the oil drilling will not be a problem since a layer of fill 16 feet in depth has been placed over the Project site. A geotechnical report appears to have been completed but because it was not provided as part this MND, the City was not able to review the study and it is not known if the geotechnical report adequately addressed

this issue and whether it verified the depth of fill and tested the soil for any hazardous material that might be closer to the surface and any mitigation to the soil that might be needed. It is also not clear if there is any evidence of methane gas that would leak to the surface. This is not mentioned in the MND. Also it is unclear whether a Phase I or Phase II soils study was performed. A summary of the results and findings of the geotechnical report should be included in Section 4.8 to demonstrate and disclose how these potential impacts are addressed, what mitigations are required by the geotechnical study and what further testing the study recommends or requires.

26. A high-pressure petroleum pipeline traverses the site but no analysis is conducted nor detailed explanation is provided in the MND as to the location of the pipeline, how deep it is, whether it is active or not, whether the construction of the Project will impact this pipeline and what precautions need to be taken during construction of the Project to protect the pipeline from damage or potential rupture. The MND only states that the pipeline would comply with safety requirements of the U.S. Department of Transportation Pipeline and Hazardous material Safety Administration and the Office of State Fire Marshall, Pipeline Safety Division. This general statement, without more information as to how the pipeline will be monitored and protected during construction of the Project, does not provide substantial evidence that a potentially significant impact has been mitigated to a level of insignificance.

Section 4.9 Hydrology and Water Quality

27. The impact analysis states that post-construction best management practices (BMPs) will be identified in the Stormwater Pollution Prevention Plan (SWPPP). A SWPPP is the report and plan that details the handling of storm and non-storm water runoff during construction. Post Construction BMPs should be identified in a Standard Urban Storm Water Mitigation Plan (SUSMP).
28. Since this project will disturb an area that is greater than one acre, a State SWPPP and Notice of Intent (NOI) will be required.
29. Since this project will disturb an area greater than 5,000 SF, a SUSMP will also be required.
30. In order to comment on the drainage of the Project site, a plan showing the existing and proposed contours needs to be submitted for review by the City.

Section 4.10 Land Use and Planning

31. The MND states incorrectly that the Project, as a "public recreational facility," is an allowed use in the R1 zoning district. A public recreational facility is a

library, museum, outdoor theatre or similar type of facility. The Project, as described in the MND, is a park and not a public recreational facility. The MND must be revised to state that the proposed use is a park.

Section 4.17 Utilities and Service Systems

32. The MND should indicate whether the Project site will be served by Los Angeles County or Culver City for trash collection. The Culver City Municipal Code requires that solid waste handling and recycling shall be performed exclusively by the City.
33. The MND should indicate whether or not the Project will be subject to Culver City's rules and regulations. Who will review the adequacy of the drainage study, SWPPP, SUSMP and other required reports?

General

34. The Stoneview Nature Center is one component of a larger project: the One Big Park Master Plan and The Park to Playa Plan, which taken as a whole could result in significant impacts to parking and traffic within Culver City. The MND fails mitigate this potentially significant impact by not including a cumulative impact analysis addressing these related project components (One Big park Master Plan and Park to Playa Plan).
35. A more detailed description of the programming and uses of the Project are needed to better understand how many people will potentially use the Project site. The MND should identify whether there will be special events allowed (i.e. private parties, exercise groups, regular personal trainers/trainees, birthday parties, picnics.). If special events are contemplated, the MND should also include information as to the size (numbers in attendance) and type of events that will be allowed, whether the County will rent out the building facility, and the process by which the parking demand and availability will be monitored such that there will not be a parking impact on neighborhood streets.

JURISDICTIONAL ROLES

36. Who has jurisdiction over the Project? Is the County exempt from local zoning and building codes? The MND should discuss this important issue and document the legal authority regarding jurisdiction over the Project. Statements throughout the MND indicate the Project is subject to Culver City's Codes and adopted General Plan. Such statements are inconsistent with and contrary to information the County provided to City staff indicating that the County will take full control over permitting and approvals for the Project and, specifically, that the County Board of Supervisors ("County Board") will be authorizing the demolition of existing buildings and approval of

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the Project sometime in September or October of this year. In addition, certain analysis and conclusions contained in the MND that the Project does not have a significant impact are based on application of City codes and regulations, yet the County claims it is not subject to Culver City's codes. It is important that the MND adequately and accurately address jurisdictional responsibilities and identify the appropriate agency that will have jurisdiction over issuing permits and enforcing policies and codes. City staff requests an opportunity to meet with County staff to discuss the numerous inconsistencies in the MND regarding this issue. This is a substantial flaw in the document that requires the MND to be revised and recirculated for comment.

37. Section 4.10 Land Use and Planning of the MND states the Project site is governed by the Culver City General Plan and concludes that the Project will not conflict with such Plan. Pursuant to Government Code Section 65402, the Project site may not be acquired and the Project may not be constructed, until the location, purpose and extent of such acquisition and construction has been submitted to and reported upon by Culver City's "planning agency" as to conformity with the City's General Plan. As of this date, the City has not received from the County a request for conformity. This is a significant deficiency, which prevents the acquisition of property and construction of the Project from moving forward.
38. If Culver City is responsible for enforcing any aspect of the Project or MND or reviewing any of the plans for fire safety, and because the County is required to request from the City a finding of conformity with the City's General Plan, the City should be included as a Responsible Agency.
39. The MND should address potential nuisance problems both on-site and off-site (crimes, noise, loitering, trash/debris, spill-over parking into the neighborhood), who will respond to these issues, and if there are any costs, who is responsible to pay for these costs?
40. Police Service – The MND states County Sheriff currently serves the Project site and will serve the Project site when the Project is completed. In reviewing the MND for the Project, the Culver City Police Department has serious concerns regarding traffic and parking enforcement. In examining the daily vehicle trips, Culver City believes that there is a distinct difference between a private school and a nature park in regards to parking. The school only had to have enough parking spaces for their staff and since the school was a private school the public did not have access to the school grounds. So the impact of over flow parking was nonexistent. With only 61 parking spaces available at the Project site, if they are all occupied this will cause the overflow traffic to park on the surrounding residential streets. As it is today, there is limited street parking available due to the street width and Blair Hills

Park which is located on the same street. The second concern is that if permit parking is implemented as mitigation for over flow parking, this would cause an increase in workload for the Culver City Police Department. As it is, there are 95 special parking permit areas in the City and adding an additional area would have a significant impact to the Police Department's workload for parking enforcement.

41. Fire Service - The MND states Culver City Fire currently serves the Project site and will serve this site when the Project is completed. If Culver City Fire Department is to serve the Project site, then the City's Fire Department should be given the opportunity to review the plans and approve any permitting that is needed to ensure adequate fire flow, fire access, and response times. A concern expressed by Culver City Fire Department is adequate access (minimum 20') to the Project site on Stoneview Drive as well as having adequate access on-site. As the Culver City Fire Department (CCFD) will be the responding agency for emergencies, fires and other life safety needs and the Project is within Culver City Jurisdiction, the County should comply with the following minimum life safety requirements and include these requirements as conditions of approval for the Project:

- a. Compliance with the California Code of Regulations, Title 24, Part 9, 2010 California Fire Code (CFC) and the Culver City Municipal Code CCMC 9.02.
- b. 2010 CFC Chapter 3, GENERAL PRECAUTIONS AGAINST FIRE.
- c. 2010 CFC Chapter 4, EMERGENCY PLANNING AND PREPAREDNESS.
- d. 2010 CFC Chapter 5, FIRE SERVICE FEATURES to include minimum 20 foot clear width on all fire apparatus access roads (includes public streets) to the Project site, all trails associated with the Project site, Kenneth Hahn Park and the Baldwin Hills Scenic Overlook. Access to the Project site should be modified to provide the 20 foot wide unobstructed clear path which may change or limit parking on narrow roadways and concerns of opposing traffic, to include a minimum 13' 6" vertical clearance, access to building openings and roofs, premises identification, KNOX boxes (as required), fire protection water supplies and fire protection equipment identification and access. A hydrant capable of flowing 1500 GPM should be placed on the southeast corner of the parking lot and the fire department connections (FDC) that serve the structure shall be placed within 15 feet of the hydrant. Both should be accessible and comply with the 2010 CFC Chapter 9, Section 912.
- e. 2010 CFC Chapter 7, FIRE RESISTIVE-RATED CONSTRUCTION. All structures should be constructed of Fire Resistive-Rated Construction, and roof assembly should be a Class A rated assembly. Project construction shall comply with LA County FD requirements for plants, plantings, clear areas and construction for an Urban Wildland Interface

- area and the requirements of being in a designated Cal Fire, High hazard Fire Zone.
- f. 2010 CFC Chapter 9, FIRE PROTECTION SYSTEMS. Per CCMC 9.02, full coverage fire sprinkler systems(s) are required in all buildings and shall be maintained, tested and inspected per the 2010 CFC Chapter 9, Section 901 and installed per the 2010 NFPA Standard 13 as amended by the Building Standards Commission and California State Fire Marshal. Plan check, permits and inspections are required by the Culver City Fire Department.
 - g. 2010 CFC Chapter 10, MEANS OF EGRESS.
 - h. 2010 CFC all chapters pertaining to the use and occupancy, hazardous materials mix, use, dispensing and storage.
 - i. Compliance with CCFD requirements for maintenance of Fire Department access, and fire life safety systems.
 - j. Establish a method of addressing additional medical and emergency calls.

PROCESS

42. County staff stated at the Public Meeting on July 17, 2013, that they do not intend to prepare a "Response to Comments" to public comments received on the MND, as it is not required under the California Environmental Quality Act (CEQA). Due to the extent of the City's comments and inadequacy of the MND, Culver City strongly believes a response to comments and a fully revised and recirculated MND should be prepared by the County. In addition, the County should provide the City an adequate opportunity to review and comment on the County's response to comments to the MND and a revised MND prior to the County Board's consideration of the adoption of the MND and approval of the Project. Further, after City comments are provided and before the County Board considers this matter, City staff would like an opportunity to meet with County staff to resolve these issues and memorialize any commitments in writing through a memorandum of understanding.