

Attachment No. 8

SUMMARY OF IVY STATION INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) COMMENTS RECEIVED AND RESPONSES February 2016

I. INDIVIDUAL COMMENT LETTERS

The City received 17 comment letters from members of the public. Below is a summary of the environmental concerns raised within the project.

A. Traffic

Traffic was the issue most frequently raised in the comment letters. The key traffic issues are listed below:

1. Supplemental Traffic Analysis of Intersections - Impacts at the intersections of Washington Boulevard/Wesley Avenue, Washington Boulevard/Cattaraugus Avenue, and Washington Boulevard/La Cienega Boulevard.

Response:

At the City's request, Kimberly Horn, the applicant's traffic engineer completed a supplemental analysis of these three intersections, which has been reviewed and approved by the City's traffic engineer. The analysis, dated January 21, 2016, showed that the project will not have a significant impact at any of these three intersections or other locations along Washington Boulevard based on applicable City traffic impact thresholds. The supplemental analysis is included as an attachment to the Planning Commission Staff Report. Also, the Final MND, includes "corrections and additions" to the Draft MND which include the results of the supplemental traffic analysis, as necessary.

2. Additional Traffic Concerns

Below are a list of primary community traffic concerns.

- **General traffic congestion in and around the project site, including along Washington, National and Venice Boulevard, as well as the local project vicinity (i.e., Culver City Arts District). Of particular note, westbound traffic impacts at Washington/National.**
- **Traffic impacts on Cattaraugus Avenue between Venice Boulevard and Robertson Boulevard, particularly since the construction of Expo.**
- **Traffic impacts to the Lucerne/Higuera neighborhood.**

- **Traffic Study did not include all related projects (i.e., Cumulus Project at Jefferson and La Cienega Boulevard in Los Angeles).**

Response:

First, the MND provided a comprehensive assessment of traffic impacts based on the project's Traffic Study. The traffic consultant consulted with both the City of Los Angeles Department of Transportation (LADOT) and Culver City before the Traffic Study was prepared, with a Memorandum of Understanding (MOU) being prepared showing the scope and assumptions of the Traffic Study. The Ivy Station MOU was approved in December 2014. The traffic impact analysis was based on established LADOT and Culver City guidelines, methodologies and traffic impact thresholds.

The traffic analysis identified potentially significant impacts to the intersections at Robertson Boulevard at National Boulevard, and at National Boulevard at Venice Boulevard. However, mitigation was prescribed that would reduce these impact to below applicable thresholds consisting of re-striping approach lanes at these intersections. In addition, potentially significant impacts were identified at the project's main driveway on National Boulevard between Venice Boulevard and Washington Boulevard. The prescribed mitigation requires installation of a traffic signal and traffic signal interconnection to adjacent traffic signals. This mitigation measure would reduce the project's traffic impact along National Boulevard at the site's primary entrance to a less than significant level based on applicable City thresholds. Furthermore, the MND identifies numerous countermeasures in the form of mitigation measures for reducing the potential for vehicular-pedestrian conflicts in and around the project site during construction and operational activities. Overall, with implementation of the prescribed mitigation measures, traffic impacts resulting from project implementation would be less than significant.

Regarding traffic impacts on Cattaragus Avenue between Venice Boulevard and Robertson Boulevard, since construction of the Expo project, it is acknowledged that the Expo Phase II construction may have resulted in temporary increase in traffic levels on some streets. However, the City of Los Angeles reviewed the Traffic Study and they did not indicate the project would have an impact in this portion of Cattaragus Avenue.

Regarding traffic impacts to the Lucerne/Higuera neighborhood, the Traffic Study did not project a significant amount of project traffic that would access the site using Duquesne, Lucerne and Higuera. The traffic congestion during peak hours is an existing condition outside of the scope of the Traffic Study for the Ivy Station project. Culver City is focusing on other modes of transportation throughout the City that encourage transit, pedestrian, and bicycle travel. The City's Bicycle and Pedestrian Master Plan shows bicycle facilities in this area.

Finally, the City of Los Angeles' list of related projects per the MOU did not include the Cumulus project since it was not recognized as a project at that time. Once an MOU is approved, new projects that come on line are not added and other projects

that fall out are not removed from the list. To do so would be unreasonable, as it would require to continuously alter the analysis as projects are added and removed.

In addition to the primary traffic concerns identified above, several other traffic-related comments were submitted to the City. Some of these comments express concerns that do not apply to the assessment of traffic impacts resulting from the project and would not result in changes to the analysis contained in the Traffic Study. Nonetheless, the City's Traffic Engineer has provided responses to these comments, which are included as part of this attachment.

B. Parking

- **Long-Term parking impacts. Is adequate parking provided?**
- **Short-term parking impacts. Expo Line parking during construction activities.**

Response

Project Parking: The Project requires a total of 1,521 parking spaces based on the proposed uses, building square footage, residential unit types and parking ratios as prescribed by the Culver City Zoning Code and the Project Site's Planned Development No. 11 zoning designation. The Project provides 1,531 vehicular parking spaces primarily distributed over 3 levels of subterranean parking. The subterranean parking will be accessed via garage ramps from Venice Boulevard, National Boulevard, and Washington Boulevard. A limited number of short term parking is provided at grade accessed from National Boulevard. The parking assignment for each use of the development is segregated with access control.

Metro Parking: Metro is generally responsible for providing parking for the Expo line but in consideration for use of a portion of the Metro right of way adjacent to the Culver City Station, the City agreed to construct and maintain 300 permanent parking spaces exclusively for Expo riders in addition to the complement of parking required for the Project. Upon Project commencement of construction, the City is required to provide up to 235 free temporary parking spaces at the nearby Ince parking structure (less than ¼ mile from Project Site) to accommodate Expo riders. Ince parking structure will accommodate the temporary addition of Expo parking through the following measures:

- 1. Adopting parking pricing strategies to more effectively utilize spaces within the overall downtown public parking supply.*
- 2. Reducing free parking at all facilities including no more than 60 minutes (with pricing at City's paid parking garages of \$1.00 per 30 minutes up to the daily maximum.*
- 3. Implement other pricing strategies for long-term daily parking.*

4. *Reducing the number of monthly parking spaces and making those spaces available for daily use.*
5. *Utilizing the City Hall garage more effectively as a parking asset by instituting new paid parking and better monitoring of parking facilities.*
6. *Installing new parking technologies (pay stations, PARCS and Tap Card, LED parking signage) to increase operational efficiency, improve customer service, and reduce overhead costs for parking operations in order to maintain the long term availability of the public parking asset.*
7. *Increasing the curb parking rates accordingly so that curb parking is more expensive than public parking structures and lots in such a way that each space turns over at least four times per day.*
8. *Maximizing efficiency of Ince parking structure when Ivy Station construction commencement with in-aisle stacked parking as needed, the addition of appropriate PARCS technology, reversible garage entry lanes during Expo commuting times, installing LED parking signage and reallocating demand by relocating monthly parking.*

C. Aesthetics

The following concerns were with regards to Aesthetics were provided:

- **Impacts regarding the size and scale of the project.**
- **Impacts regarding scenic vistas from residential properties, including residential uses to the northeast of the site.**

Response:

The MND document includes a comprehensive analysis of aesthetics impacts, including an assessment as to whether the project would substantially degrade the existing visual quality and character of the site and its surrounding. The analysis includes a number of visual simulations to support the assessment. As the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the project would not substantially degrade the visual character and quality of the site and its surroundings. Furthermore, the project would substantially increase landscaping and open space on the project site, including a streetscape design that would allow pedestrians, terraces, café tables, seating, public art, and parkway planters, as well as the Transit Plaza, a Great Lawn area, and a Central Plaza. These features would be a positive aesthetic improvement to the site. Thus, impacts regarding visual quality would be less than significant.

With regards to impacts on scenic vistas, the project site is not located in a scenic resource area or area with protected views designated by Culver City or the City of Los Angeles. It is acknowledged that the project would alter views of the project site from surrounding areas. However, the analysis of impacts to visual resources typically includes analysis of views from public places such as designated scenic highways, corridors, parkways, roadways, bike paths and trails. A private residence is not considered a viewing location since views of broad horizons, aesthetic features, and other scenic resources would not be available to the public, particularly if the project substantially complies with the zoning/land use designations and design guidelines applicable to the site. Accordingly, the assessment of aesthetics impacts properly evaluates impacts based on applicable CEQA guidelines and impact thresholds.

D. Housing

- **Several comments were received regarding the need for low income housing.**

Response:

The project is not proposing low-income or affordable housing. The project is not subject to any affordable housing provisions and as such, the MND appropriately did not evaluate any such impacts.

E. Noise

- **Comments were received regarding whether or not construction activities would occur on Sundays. Consistent with Culver City's permitted construction hours, the project will be conditioned to prohibit construction activities on Sundays.**

Response:

Also, it is noted that future development of the site across from the project site was considered in the MND analysis, as necessary. With regards to construction-related noise impacts, both the 8777 Washington Boulevard project and the Ivy Station project will be required to prepare and implement a Construction Management Plan. These plans will seek to minimize overlapping heavy equipment construction phases, where feasible. The plans, prepared by the construction contractors, will be submitted to and approved by the City Building Official. The only noise sensitive receptor(s) with the potential to experience cumulative noise from construction of these projects would be the future residential uses at the Access Culver City site. All other receptors are located at distances such that cumulative construction noise levels would be narrowly perceptible, if at all. Regardless, all construction activities would occur in compliance with Culver City's permitted hours of construction and be subject to noise reduction techniques consistent with City noise policies, which would also be conditions of

approval for the project. As such, construction noise impacts would be less than significant.

With regards to operational noise, comments were received regarding traffic noise impacts along the I-10 Freeway, with specific interest along the I-10 eastbound onramp, which runs between National Boulevard and Cattaraugus Avenue. Mobile noise impacts are based on Community Noise Equivalent Levels or CNEL (dBA). CNEL is a single number result that is calculated for a complete 24-hour period and usually made up of results taken at shorter intervals such as 5 minutes or 1 hour and then averaged over the whole 24 hours. As shown in Table B-13 of the MND, CNEL noise levels along National Boulevard between Robertson Boulevard and I-10 EB on-ramps would be 71.8 dBA under Future With and Without Project conditions. With ambient noise being relatively high at 71.8 dBA, the addition of project traffic would not change the CNEL noise level under the "With Project" condition. Accordingly, a similar circumstance would occur along the I-10 on-ramp. Project generated and cumulative traffic, including delivery trucks or otherwise, would not change the CNEL noise level at the on-ramp by more than 1 dBA CNEL. This noise increase would not result in a significant noise impact based on applicable thresholds, and further would not likely even be a perceptible increase in noise beyond existing conditions.

F. Construction-Related Impacts

- **Several comments were received regarding the potential for construction-related impacts.**

Response:

The MND provided an assessment construction-related air quality, noise and traffic impacts. With regards to air quality, short-term impacts were fully evaluated based on applicable South Coast Air Quality Management District (SCAQMD) methodologies and thresholds. The MND analysis concludes that construction-related emissions would be below applicable SCAQMD impact thresholds and that nearby sensitive receptors would not be exposed to substantial pollutant concentrations.

As discussed above, all construction activities would occur in compliance with Culver City's permitted hours of construction, including no construction on Sundays, and be subject to noise reduction techniques consistent with City noise policies, which would also be conditions of approval for the project. As such, construction noise impacts would be less than significant.

Also, a Construction Traffic Management Plan will be developed by the project contractor in consultation with the project's traffic and/or civil engineer and approved by the City of Culver City, City Engineer and Planning Manager and the City of Los Angeles Department of Public Works prior to issuance of any project demolition, grading or excavation permit. The Construction Traffic Management Plan will also be reviewed and approved by the Cities Fire and Police Departments. The construction

management plan will include an up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination will include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties; and the location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas. Thus, the Plan will designed and implemented to maintain adequate emergency response in and around the project site.

II. AGENCY AND ORGANIZATION COMMENT LETTERS

1. **Soboba Band of Luiseño Indians (January 19, 2016).** The Soboba Band has noted they do not have any specific concerns regarding known cultural resources in the area, but do request that an approved Native American Monitor(s) be present during project ground disturbance activities. The prescribed mitigation in the MND includes monitoring for potential impacts to unknown archaeological and Native American resources consistent with this letter. It is also acknowledged that the Soboba Band are a Band of Luiseño Indians that are not affiliated with the LA Basin area (and Culver City) – the Gabrielino Indians (or Gabrieleño, Kizh, or Tongva) are affiliated with the LA Basin. The Luiseño Indians are affiliated with western Riverside County and northern San Diego County. This letter defers all future Native American consultation for this project to a Gabrielino band. Letters to the various Gabrielino bands have been provided.
2. **Los Angeles County Metropolitan Transportation Authority or “Metro” (January 28, 2016).** Metro’s letter includes comments pertaining to bus operations and a bus stops adjacent to the project site. Also, comments are provided pertaining to the project’s compatibility with the adjacent Metro Light Expo Light Rail Line and Station within the Railroad Right-of-Way (ROW) during construction and operation of the project. The Project Applicant and City are committed to working closely with Metro throughout the project approval and development process. Existing agreements are in place with Metro for the construction and design of the project to which the Project Applicant will adhere to. The comments provided by Metro pertaining to bus operations and compatibility with the adjacent Expo Line Operations will become conditions of approval for the project, as necessary.
3. **State of California, Department of Transportation or “Caltrans” (January 13, 2016).** The Caltrans comment requests supplemental information or clarifications to the analysis contained in the Traffic Impact Analysis (or Traffic Study), prepared by Kimley Horn, dated October 2015. The MND analysis of traffic impacts was based on the October 2015 Traffic Study. Of note, the Caltrans letter requests supplemental studies of I-10 Freeway on- and off-ramps in the local project vicinity, addition of a recent proposed project in the traffic study area and updates to current traffic-related infrastructure. Kimley Horn has prepared individual responses to each of Caltrans comments, which are included as part of this attachment. Where necessary, the Final MND, includes “corrections and additions” to the Draft MND that have been made to clarify, correct, or add to the information provided based on the Caltrans comments. These changes do not add significant new information to the Draft MND, nor do they result in new or more severe significant environmental impacts from the project.
4. **Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (January 20, 2016).** This letter acknowledges that the project has complied with State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

5. **Los Angeles County Bicycle Coalition (January 4, 2016).** This letter states that it is incumbent upon the project to accommodate a clear and ride-able bicycle connection between the Expo bike path sections to the east and west of the project site. The project intends to dedicate 10-feet on National Boulevard for bike lanes. There will also be a new bike box installed on Washington for southbound bicyclists on National that wish to turn left onto Washington Boulevard. Bike lanes will be installed on both sides of Washington from the new signal at Wesley to National (both to be installed by Access Culver City). Thus, there will be a way to continue from the Expo Bike path south of the Expo station to the bike path north of Venice without the need for walking the bike. Nonetheless, the City intends to further evaluate the potential for improved bikeway facilities in and around the project site in consideration of input from the LA County Bicycle Coalition.

Attachment No. 8a

**IVY STATION PROJECT – TRAFFIC RELATED COMMENTS AND RESPONSES BY CULVER CITY PUBLIC
WORKS DEPARTMENT**

February 4, 2016

1. Level of Service (LOS) at Washington/National seems low.

Level of Service (LOS) is a quantitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS B is recognized as “very good” for an urban area. LOS C is recognized as “good”, and LOS D is typically recognized as “fair”, an acceptable level of service, in an urban area. Each increment in LOS, say from C to D, represents a ten percent increase in traffic and ten percent increase in traffic congestion.

As standard practice in traffic engineering and planning and defined in Culver City’s traffic study guidelines, the City of Los Angeles and other cities in California, traffic counts are conducted on a typical weekday during the AM and PM peak periods to understand the general traffic conditions. The traffic counts for Ivy Station at the intersection of Washington Bl. and National Bl. taken in November 2014 showed LOS B in the am and LOS C in the pm. The traffic counts for the Cumulus project taken in February 2015 showed LOS C in the am and LOS D in the pm. Considering that the counts were taken at different times, and there can be a 10% variation in traffic counts taken the same month, the differences in LOS are reasonable. The traffic counts for the most recent traffic study indicates the level of traffic at Washington/National ranges from good to fair.

2. Cumulus Project not included as a related project.

A memorandum of understanding (MOU) showing the scope and assumptions of the traffic study must be approved by the City before for the traffic study is begun. The Ivy Station MOU was approved December 2014. The City of Los Angeles’ list of related projects did not include the Cumulus project since was it was not recognized as a project at that time. Once an MOU is approved, new projects that come on line are not added and other projects that fall out are not removed from the list. To do so would be unreasonable, as it would require to continuously alter the analysis as projects are added and removed.

3. Washington/National – It takes 1-1/2 to 2 signal cycles to for westbound traffic to get through the intersection.

Recently, Tuesday, January 12th the traffic signal at Washington/National was on flash because the City of Culver City modified the traffic signal by the installation of a westbound right-turn arrow. This and a lane closure caused excessive delay for westbound traffic, particularly in the am. There have also been lane closures in the eastbound direction because of construction projects at near the intersection. These are existing conditions that are not a result of the proposed project. Our observations indicate that generally the queue of traffic in both directions on Washington Boulevard are able to get through the intersection on one traffic signal cycle under normal operations when there are no lane closures or ongoing construction work on the streets. We are continuously working on improving the traffic flow

and our traffic engineer is currently reviewing the timing of the traffic signals for possible adjustments to improve the flow of traffic through the intersection.

4. Development projects will make Washington Bl. from National Bl. to Washington Bl. gridlocked. What is being done to prevent gridlock?

Washington Boulevard is an east-west commuter route that carries a significant amount of through traffic from the City of Los Angeles and other cities. It is for the most part an existing condition outside of the scope of the traffic study for the Ivy Station Project that should be addressed on a regional basis. To improve traffic conditions to the greatest extent possible, Culver City is focusing on identifying projects that encourage smart growth that supports transit, pedestrian, and bicycle modes of transportation. The Ivy Station project is located a short walking distance from the Metro train station, which will encourage more travel by transit. The “mixed use” combination of uses will encourage residents of the development to shop and dine within the project site. In addition, the development will dedicate right of way along National Boulevard in order to provide bicycle lanes along National Boulevard.

Specifically, to improve traffic flow along Washington Boulevard, Culver City plans to install Adaptive Traffic Control System (ATCS), which is state-of-the-art traffic signal synchronization along Washington Boulevard in the reach between National Boulevard and La Cienega Bl. by early 2018. This will provide the City with additional flexibility so that it can adjust the traffic signals to real-time traffic conditions, including when there are unforeseen lane closures or construction work on the streets. This will result in improved travel time for motorists along Washington Boulevard. In the meantime, our traffic engineers will review the existing timing of the traffic signals for possible adjustments to reduce the backup queues of traffic along Washington Bl.

5. Traffic on Cattaragus Avenue between Venice Bl. and Robertson Bl. is terrible since the construction of Expo two years ago.

The Expo Phase II construction may have resulted in temporary increase in traffic levels on some streets. Since this particular street segment is in the City of Los Angeles’ jurisdiction, we will forward this comment to the City of Los Angeles. The City of Los Angeles reviewed the traffic study for the Ivy Station project, and they did not indicate the project would have an impact in this portion of Cattaragus Avenue.

6. Traffic study needs supplemental analysis at Washington/Wesley, Washington/Cattaragus and at Washington/La Cienega.

At the City’s request, Kimberly Horn, the applicant’s traffic engineer completed a supplemental analysis of the intersections of Washington/Wesley, Washington/Cattaragus and Washington/La Cienega. The analysis, dated January 21, 2016, showed that the project will not have a significant impact at any of these three intersections or other locations along Washington Boulevard.

7. Permit parking on residential streets. How can permit parking be implemented on his and surrounding streets on a "master plan" type basis, rather than on a street-by-street basis as applied for by residents.

Because not every resident is in favor of permit parking restrictions because of the inconvenience, cost etc., the City Council has adopted parking restrictions on a "street by street" basis. However, in order to facilitate the process of installing permit parking where desired, City Council has "pre-approved" every residential street in the City for permit parking restrictions. All that is required is a petition signed by 75% of the households (in order to demonstrate the desire for permit parking) in order to initiate the process. Aside from the cost of the individual permits (\$20 each for up to two), there are no longer any fees involved in the process, there are no longer parking studies required for the standard restrictions, nor are the costs of the signs themselves passed on to the residents as in the past. The installation of the signs depends on how quickly a qualifying petition is submitted, and how quickly the residents purchase permits once they're advised they may do so. Once permit parking restrictions are installed on any street, that street does become part of a "district" and the parking permits will allow parking anywhere within that specific district.

The residential area south of Washington Boulevard is District 2. The process is essentially, a two-step process:

1. The streets that currently do not have parking restrictions have the potential to become parking-restricted streets. A petition is a requisite of the City Council-adopted program. The residents of the interested blocks may submit a single petition representing all the intended streets, if they desire (the petition may also be block-by-block). Although a single petition for all is acceptable, each block will be held to meet the 75% consensus criteria. If this criteria is met, then step 2 can begin.
2. The parking restriction signs can be installed after 66% of the residences of each petitioning block purchase parking permits (or apply for free guest parking passes, in case they do not have a need for parking permits). After this criteria is met, signs are ordered, and are generally delivered within two to six weeks. Once they are delivered the City will install the signs within two weeks.

As a point of information, recently, a developer was required to pay for one year's cost of up to two parking permits for each residence on a street (at \$40 per residence). However, the developer, by choice, paid for five years.

City representatives would be happy to meet with the residents or a representative group, to discuss the program and answer their questions.



Projects will make Washington gridlocked. Need information on strategies to prevent gridlock of traffic in Culver City Arts District.

See response No. 4.

8. The project will have a great negative impact on transportation in the Lucerne/Higuera neighborhood. Cars coming off of Jefferson from the west will use Duquesne, Lucerne and Higuera to access the project.

The traffic study did not project a significant amount of project would access the site using Duquesne, Lucerne and Higuera. The traffic congestion during peak hours is an existing condition outside of the scope of the traffic study for the Ivy Station Project. Culver City is focusing on the other modes of transportation throughout the City that encourage transit, pedestrian, and bicycle travel. The City's Bicycle and Pedestrian Master Plan shows bicycle facilities in this area.

9. The Ivy Station project did not consider impacts on Washington Boulevard.

See response No. 6.

See response No. 4.

10. Regarding the multiple active/proposed developments in Culver City, everyone needs to be talking and planning together.

The City is coordinating all of the reviews and each project takes into account the other projects and their mitigation measures. Culver City follows a procedure for reviewing traffic studies that is widely followed by other cities in California and nationwide. Included in every project's traffic study is a list of related projects, which includes the peak period traffic generated by all the other known projects in Culver City as well as in the City of Los Angeles and other neighboring jurisdictions. The traffic generated by all the related projects is added to existing traffic counts to form the base conditions for the traffic study. The amount of traffic generated by the project and related projects is based on

nationally accepted trip generation rates prepared by the Institute of Transportation Engineers (ITE). The traffic generated by the project is then added to the base traffic condition to determine if the project would have an impact at any intersection or residential street, and if any transportation improvement measures are required to mitigate the impact of the project. The project is responsible for mitigating the impacts caused by the project. It is not responsible to mitigate an existing traffic condition. However, Culver City is working on projects to improve travel conditions for all the modes of transportation. Specifically, to improve traffic flow along Washington Boulevard, Culver City plans to install Adaptive Traffic Control System (ATCS), which is state-of-the-art traffic signal synchronization, citywide by early 2018. This will provide the City with additional flexibility so that it can adjust the traffic signals to real-time traffic conditions. Traffic signals are planned at the intersections of Washington/Wesley and Washington/Cattaragus to improve traffic conditions. As part of the City's Bicycle and Pedestrian Master Plan, the City plans to install bicycle facilities along Washington Boulevard and National Boulevard, and facilitate bicycle travel from the Expo Line to Venice Boulevard. Several development projects are responsible to restripe Washington Boulevard and National Boulevard with bicycle lanes as part of their required traffic mitigation.

11. Lack of traffic studies on Washington Boulevard. Cattaragus is backed up from Venice Boulevard all the way to Washington and spills out onto Washington, completely grid-locking the street south of Washington.

Regarding the first comment, at the City's request, Kimberly Horn, the applicant's traffic engineer completed a supplemental analysis of the intersections of Washington/Wesley, Washington/Cattaragus and Washington/La Cienega. The analysis, dated January 21, 2016, showed that the project will not have a significant impact at any of these three intersections or other locations along Washington Boulevard.

Regarding Cattaragus Avenue, the Expo Phase II construction may have resulted in temporary increase in traffic levels on Cattaragus Avenue. Traffic signals are planned at the intersections of Washington/Cattaragus to improve traffic conditions and traffic safety there. The Ivy Station and other projects are responsible for mitigating the impacts caused by those projects. They are not responsible to mitigate an existing traffic condition.

12. Need the bicycle path starting at Washington and National that skirts the development and get bicyclists to the Bike Hub safely and easily. Accommodate cyclists through the site.

The developer of the Ivy Station will allow bicycle travel through the project site to provide easy and direct bicycle travel from the Washington/National intersection to the Bike Hub.

13. Punch Wesley Street through to connect to National Boulevard under the Metro platform.

Punching Wesley Street through and providing a direct connection from Washington Boulevard to National Boulevard would be detrimental to the businesses on Wesley Street north of National Boulevard and to the residents of Wesley Street south of National Boulevard. It would form a cut-through bypass for motorists wanting to avoid the Washington/National intersection resulting in a significant increase in traffic on Wesley Street north and south of National Boulevard. Other undesirable aspects are the offset intersections of Wesley Street and National Boulevard and traffic crossing the Expo bicycle path would create potential conflicts.

14. There's a lot of traffic in downtown Culver City, and Ivy Station will cause additional traffic.

The traffic counts for Ivy Station project and other recent traffic studies indicate that for an urban area most of the intersections in the area now operate at good to fair levels of congestion and levels of service (LOS), and will operate at good to fair levels after the project is expected to be completed in 2019. The levels of congestion for intersections in the Ivy Station area are actually good compared to urban areas in neighboring jurisdictions. See response to No. 1 for a description of LOS.

Being located at a transit station will allow residents and customers of the development to access the site by transit. In addition, the Ivy Station will dedicate sufficient right of way to provide bicycle lanes along National Boulevard to allow improved bicycle access to the project. As shown in the traffic study, traffic generated by the Ivy Station project will have a significant impact at the intersections of National/Robertson and Venice/National. The project will be responsible to improve those intersections to mitigate their impact.

15. The report makes no mention of the residential area to the northeast of the project (known as the Helms Neighborhood). Cut-through traffic detours from westbound Venice Boulevard to avoid the Venice/National intersection. The intersection of National/Regent is not studied in the report.

Culver City staff closely coordinated all aspects of the Ivy Station traffic study with the City of Los Angeles Department of Transportation (LADOT), including the amount of traffic generated by the project, directional distribution of traffic, and intersections and residential streets to be studied. The traffic study findings were approved by LADOT. The project is not expected to generate a significant amount of traffic on any of the local residential streets or intersections in the Helms Neighborhood in the City of Los Angeles. Some of the traffic detouring in the Helms Neighborhood may be attributed recent building and road construction in the area projects, which have caused lane closures and delays.

Attachment No. 8b

Response to Caltrans Comments to Ivy Station IS/MND

Caltrans Comments:

To assist in evaluating the impacts of this project to State Transportation Facilities, please consider the following comments:

- An encroachment permit will be required. Any project work proposed in the vicinity of the Caltrans Right of Way, would require an encroachment permit and all environmental concerns must be adequately addressed.

Response: Comment noted. The applicant will coordinate with the Caltrans Permits staff and submit an encroachment permit application during the construction documents preparation stage.

- The project proposes dual left-turn lanes for the northbound approach along State Route-187 (Venice Blvd at National Blvd.) This improvement has already been completed.

Response: We would like to clarify that the report considers National Boulevard as north-south approach and therefore northbound approach is made in reference to National Boulevard and not Venice Boulevard.

- The portion of Venice Boulevard inside the project limits falls within Caltrans Jurisdiction. Please revise the Traffic Impact Analysis (Table 1- Study Area Intersections) to reflect this.

Response: The reference in this Table is made for the intersection of National Boulevard and Venice Boulevard, which is owned by Caltrans but maintained and operated by the City of Los Angeles.

- The project did not consider the impact at the Eastbound I-10 Freeway off-ramp to Exposition Blvd and the Westbound I-10 Freeway on-ramp from Robertson Place.

Response: A freeway impact screening analysis was conducted as per LADOT and City of Culver City Traffic Study Guidelines. The methodology from the agreement between City of Los Angeles and Caltrans District 7 on freeway impact analysis procedures, which is also adopted by the City of Culver City, was used for the freeway impact screening analysis. The number of project trips to the Eastbound I-10 Freeway off-ramp to Exposition Blvd and the Westbound I-10 Freeway on-ramp from Robertson Place, were below the criteria as defined in the freeway screening analysis agreement, and therefore were not included in the analysis.

- The results of the LOS Analysis for year 2014 (Table 3) existing conditions conflicts with the results of the traffic report provided by Gibson Transportation Consulting, Inc. Furthermore, the Gibson traffic report indicates a Peak Hour LOS of F for Future Year 2018 at the intersections of:
 - Culver Blvd at Venice Blvd
 - Robertson Blvd at Venice Blvd
 - National Blvd at Venice Blvd
 - La Cienega Blvd at Venice Blvd
 - Fairfax Ave at Washington Blvd
 - Washington Blvd at National Blvd
 - Jefferson Blvd at National Blvd

(Refer to the Jefferson and La Cienega Project DEIR; State Clearinghouse #2015031047).

Response: Given that the traffic counts were completed on different days, up to 10% variance in the results are expected. Traffic counts for the Ivy station project were collected during a typical weekday AM and PM peak periods, and was further validated that there were no construction related or accident related congestion in the nearby area that would alter the traffic patterns. Regarding the comment on Future LOS, the memorandum of understanding (MOU) for the Ivy Station was submitted and approved December 2014. The City of Los Angeles' list of related projects did not include the State Clearinghouse #2015031047 project since it was not recognized as a project at that time. We expect some related projects to drop out and some to be added during the course of conducting and the review process of the traffic study. After discussions with City staff, it was determined to be unreasonable to add projects after the analysis, as it would require to continuously alter the analysis as projects are added and removed, which will remove the certainty in the analysis results throughout the traffic study.

- **Location 13 should be Fairfax Ave. and not Fairfax Blvd.**

Response: Comment noted and this text change will be addressed.

- **Include the Jefferson and La Cienega Project; State Clearinghouse #2015031047 to the list of related projects (Table 6).**

Response: As stated earlier, the memorandum of understanding (MOU) for the Ivy Station was submitted and approved December 2014. The City of Los Angeles' list of related projects did not include the State Clearinghouse #2015031047 project since it was not recognized as a project at that time. We expect some related projects to drop out and some to be added during the course of conducting and the review process of the traffic study. After discussions with City staff, it was determined to be unreasonable to add projects after the analysis, as it would require to continuously alter the analysis as projects are added and removed, which will remove the certainty in the analysis results throughout the traffic study.