



July 20, 2022

City of Culver City

RE: 7:00am Construction Start Hour (Monday through Friday) — 8825 National Blvd Culver City, CA 90232

To Whom It May Concern:

Per Culver City Code 9.07.035 Construction states that construction is prohibited between the hours of 8:00pm and 8:00am Monday through Friday, between 7:00pm and 9:00am on Saturday, and between 7:00pm and 10:00am on Sunday.

To ensure a successful project and reduce construction related impacts to Culver City and its residents, Hathaway Dinwiddie would like to request permission to extend the daily construction hours Monday through Friday from 8:00am – 8:00pm to 7:00am – 8:00pm for the Crossings Campus Project located at 8825 National Blvd Culver City, CA 90232 to realize the following benefits:

- A reduction in overall construction duration by 30 calendar days
- A reduction in the anticipated volume of project-related truck traffic during peak afternoon hours on business days around Culver City, as starting at 7:00am would result in most construction activities ending by 3:00pm
- Enable a more efficient daily flow of trade workers by increasing carpooling opportunities, as a 7:00am start time would align with the working hours in Los Angeles for the Los Angeles Buildings of Crossings Campus (8888 Venice Blvd Los Angeles, CA 90232).

While the overall reduction in the project's construction period and the related reduced period of impacts would be the most significant benefit to Culver City and the City's residents, the following are key examples of construction activities that would be less impactful if allowed to utilize the proposed extended hours:

- The concrete mat foundation will consist of 4 separate concrete pour days; allowing these pours to commence earlier in the day will alleviate afternoon traffic and reduce the overall construction duration.
- Concrete pours (decking, columns) will consist of 48 separate concrete pour days; allowing concrete pours to commence earlier in the day will alleviate afternoon traffic and reduce the overall construction duration.
- Grading, excavation and site preparation will consist of 113 working days; allowing dirt hauling to commence earlier will reduce this number of days and ultimately reduce the overall project duration.



Hathaway  
Dinwiddie

We are committed to being a good Culver City neighbor and will comply with all City's requirements. Therefore, we wanted to respectfully request 7:00am start hours Monday through Friday the duration of construction activities.

Thank you for your consideration

Sincerely,

Greg Kearns,

Hathaway Dinwiddie Construction General Superintendent



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esassoc.com

# memorandum

date           October 17, 2022

to             Jeff Anderson

cc

from          Mike Harden

subject       Crossings Campus Project – Extended Construction Hours CEQA Implications

## Extended Construction Hours Request

ESA is aware that the Project Applicant has submitted an Extended Construction Hours Request to the City. Per Culver City Municipal Code (CCMC) Section 9.07.035, construction is prohibited between the hours of 8:00 p.m. and 8:00 a.m. Monday through Friday, between 7:00 p.m. and 9:00 a.m. on Saturday, and between 7:00 p.m. and 10:00 a.m. on Sunday.

In their request, the Project Applicant has requested the City to allow construction to occur Monday through Friday to begin at 7:00, rather than 8:00 a.m., with no other changes to the allowable construction start/end times. This request would result in:

- A reduction in overall construction duration by 30 calendar days.
- A reduction in the anticipated volume of project-related truck traffic during peak afternoon hours on business days around Culver City, as starting at 7:00 a.m. would result in most construction activities ending by 3:00 p.m.
- Enable a more efficient daily flow of trade workers by increasing carpooling opportunities, as a 7:00 a.m. start time would align with the working hours in Los Angeles for the Los Angeles Buildings of Crossings Campus (8888 Venice Blvd Los Angeles, CA 90232).

If the Extended Construction Hours Request is approved for the duration of construction, the following construction activities would benefit from the extended hours:

- The concrete mat foundation will consist of 4 separate concrete pour days; allowing these pours to commence earlier in the day will correspondingly reduce afternoon traffic as same amount of daily trucks are needed under either scenario.
- Concrete pours (decking, columns) will consist of 48 separate concrete pour days; allowing concrete pours to commence earlier in the day will correspondingly reduce afternoon traffic as same amount of daily trucks are needed under either scenario.

- Grading, excavation and site preparation will consist of 113 working days; allowing dirt hauling to commence earlier will reduce this number of days and ultimately reduce the overall Project duration.

## **CEQA Implications**

### Noise

An Environmental Impact Report (EIR) was prepared to analyze the environmental impacts of the Project's construction and operational activities. The Extended Construction Hours Request was considered and analyzed in Section 4.10, *Noise*, of the Draft EIR. As stated on page 4.10-22 of the Draft EIR, the first noise criteria to determine if significant noise impacts would occur is as follows:

- Noise Criteria (NC)-1: Without City approval for extended construction hours, Project construction activities within the Los Angeles Parcel would not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday, and within the Culver City Parcel between the hours of 8:00 p.m. and 8:00 a.m. Mondays through Fridays; 7:00 p.m. and 9:00 a.m. Saturdays; 7:00 p.m. and 10:00 a.m. Sundays. Construction occurring within these non-permitted hours would cause a significant noise impact without City approval. That is, should extended construction hours (7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) be granted by the City of Los Angeles and/or Culver City via their respective approval processes, a determination of construction noise impacts occurring during those approved extended hours would be subject to the construction-related noise criteria below, as applicable.

The Project's construction noise analysis on page 4.10-37 of the Draft EIR includes the following:

"As indicated above, that Los Angeles Municipal Code (LAMC) Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. In the event construction occurs outside of the permitted hours without approval from the respective jurisdiction, as applicable, a significant impact would occur. However, it is anticipated that the Project would seek approval from the respective jurisdiction, as applicable; to initiate construction as early as 7:00 a.m. and end as late as 10:00 p.m. During these extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) noise levels could still nonetheless exceed the thresholds as shown in Table 4.10-10 of the Draft EIR, and for this reason, would be considered potentially significant impacts.

As Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance (see NC-1, NC-2, and NC-3 in Thresholds of Significance) at all studied receptors, construction noise impacts would be potentially significant, and mitigation measures would be required."

As shown the above, the Draft EIR disclosed the potential for potentially significant noise impacts to occur during the extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) whereby noise levels could exceed the thresholds as shown in Table 4.10-10, Estimate of Construction Noise Levels ( $L_{eq}$ ) Without Mitigation at Existing Off-Site Sensitive Receptor Locations, of the Draft EIR.

The Draft EIR includes Mitigation Measures NOI-MM-1 and NOI-MM-2 to reduce on-site construction-related noise levels via the use of temporary noise barriers and properly maintained equipment, respectively.

The Project’s “Level of Significance after Mitigation” findings related to construction noise is included on pages 4.10-54 and 4.10-55 of the Draft EIR. The impact findings on page 4.10-55 of the Draft EIR include the following:

“As indicated above, LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays; 9:00 a.m. and 7:00 p.m. Saturdays; 10:00 a.m. and 7:00 p.m. Sundays. In the event construction occurs outside of the permitted hours without approval from the respective jurisdiction, as applicable, a significant impact would occur from any construction-related noise. However, it is anticipated that the Project would obtain approval from the respective jurisdiction, as applicable, to initiate construction as early as 7:00 a.m. and end as late as 10:00 p.m. During these extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. and 8:00 p.m. to 10:00 p.m.) noise levels could exceed the thresholds as shown in Table 4.10-15 even with mitigation, and for this reason, would be considered a significant and unavoidable impact.”

Thus, similar to construction activities occurring after 8 a.m. Monday to Friday, construction occurring between 7 a.m. to 8 a.m. as part of an Extended Construction Hours Request, would also result in the same temporary, periodic significant and unavoidable impacts as shown in Table 4.10-10, of the Draft EIR.

In summary, the Draft EIR adequately addressed the potential for noise impacts occurring with and without the Extended Construction Hours Request approval.

#### Other CEQA Issue Areas

With regard to construction-related impacts, under the Extended Construction Hours Request, the same amount of maximum daily on-site equipment and trucks would occur at the Project Site as evaluated in the Draft EIR. The analysis of air quality evaluates emissions on a daily basis (not on an hourly basis). Thus, because the same amount of maximum daily emissions would occur with or without approval of the Extended Construction Hours Request, the air quality analysis and conclusions in the Draft EIR is not affected by the Extended Construction Hours Request.

With regard to traffic/transportation, from a CEQA perspective, the transportation impact analyses and conclusions included in the EIR are not directly tied to construction hours. Because the Project Site is located less than 600 feet from the Metro “E” Line Culver City Station, it qualifies for vehicle miles travelled (VMT) screening as specified in the City’s Transportation Study Criteria and Guidelines (TSCG). Therefore, a VMT analysis is not required for the Project, with or without approval of the Extended Construction Hours Request and the Project would have a less than significant impact with respect to VMT. Also, it is acknowledged that the Project’s Construction Management Plan (CMP) included as a Project Design Feature (TRAF-PDF-1) would ensure that adequate emergency access is maintained during any extended hours, if approved.

No other environmental impacts analyses or conclusions for issues not identified above and evaluated in the Draft EIR would be materially changed should an Extended Construction Hours Request be approved for the Project.