December 1, 2008

City of Culver City
Culver City Redevelopment Agency
City Council Members
Members of the Culver City Redevelopment Agency

Dear Mssrs.:

Please accept this comment letter from the Culver City Board of Education regarding the current development plans that are being considered by the City Council and Culver City Redevelopment Agency for construction of a mixed-use project at 4043 Irving Place.

The Culver City Unified School District (the "District") consists of ten schools, with approximately 6,500 students and 760 employees. As you are aware, the property in question, 4043 Irving Place, is located directly across the street from the District's Administrative Offices and Linwood E. Howe Elementary School. The District employs 120 personnel at these two sites. Additionally, approximately 500 students attend this elementary school. Moreover, many parents and members of the Culver City community visit each of these sites on a daily basis.

This letter is being submitted to express our concerns about two critical issues that could affect the health and safety of our school children and employees. The Board of Education hereby requests these comments be carefully evaluated and considered.

Health Concerns

It is our understanding that a Phase I Environmental Site Assessment from 1993 and a Phase II Environmental Site Assessment from 1995 analyzed and identified hazardous material (including lead, asbestos and other material) that existed at the site. As a result, a Remediation Action Plan (RAP) was prepared and, in 1996 when the old Coast Media building was demolished, all hazardous substances were removed from the building and the surface of the site pursuant to the RAP and prior to the site being paved for use as a parking lot. Lead that had leached into the soil was not removed. According to a January, 2007, "Site Characterization" study which was conducted on behalf of the applicant/developer to address the release of lead into the soil, 16 soil samples were analyzed which determined traces of lead do exist below the pavement.

Should this project ultimately be approved by the City Council, it is important to the Board of Education that a thorough Health and Safety Plan be adopted which outlines specific mitigations including the removal and disposal of any contaminated soil. This Health and Safety Plan should include mitigations such as, but not limited to:

- keep the site closed during excavation;
- keep the soil wet, but not muddy, during excavation;
- keep all soil/dirt on the property without overflow to the adjoining sidewalks or streets;
- no visible dust;
- proper and thorough washing of vehicles involved in the excavation process;
- continual air sampling upstream and downstream of the project site;
- an air sampling monitoring system on both school district properties, but especially Linwood E. Howe school grounds/playground area;
- mitigation of noise during the school day.

Traffic Concerns

We understand that several Traffic Analyses have been conducted and that the City's Consulting Traffic Engineer has reviewed these analyses and has concurred that traffic in the area would not be significantly impacted by the Project. As you are aware, traffic at all of our school sites including Linwood E. Howe Elementary, is consistently difficult, especially at the start and conclusion of the school day and during school special events. We acknowledge that traffic around school sites is an issue of great concern to both the Board of Education and the City Council. We believe the added traffic congestion that will be created by this development will exacerbate an already challenging traffic situation in the impacted areas. Should this project ultimately be approved by the City Council, we are confident that appropriate mitigation of construction related traffic will be implemented.

Thank you for your time and attention to our concerns.

Sincerely,

Dana Russell, D.D.S., President	Jessica Beagles-Roos, Ph.D., Vice President
Saundra Davis, M.A., Clerk	Steven Gourley, Member
Scott Zeidman, Esq., Member	