

RESPONSE TO COMMENTS

A Draft IS/MND (SCH: 2018121033) was circulated for a 30-day public review and comment period from December 13, 2018 to January 14, 2019. The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration was filed with the County of Los Angeles Recorder's Office in Norwalk, submitted to State Clearinghouse, and published in Culver City News on December 13, 2018. The NOI was also emailed to subscribers of the City's GovDelivery system. A digital copy of the proposed IS/MND as well as other documents concerning the project were available for public review on the City's website under City Projects. A hard copy of the IS/MND was available for review by the public at the Engineering Division Counter, City Hall. During the public review period, 6 comment letters were received and provide herein is a copy of each letter received and a response to comments.

Letter Number	Date Received	Agency	Author
1	12/20/2018	Gabrieleno Band of Mission Indians/ Kizh Nation	Gabrieleno Band of Mission Indians/ Kizh Nation
2	01/08/2019	California Department of Toxic Control (DTSC)	Pete Cooke
3	01/09/2019	South Coast Air Quality Management District (SCAQMD)	Lijin Sun, J.D.
4	01/09/2019	California Department of Transportation (Caltrans)	Miya Edmonson
5	01/14/2019	Metropolitan Water District of Southern California	Sean Carlson
6.	1/22/2019	Governor's Office of Planning and Research	Lee Torres

*Letters numbered in the order they were received.



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

December 20, 2018

City of Culver City
9505 Jefferson Boulevard
Culver City, CA 90232

Good Afternoon Lee Torres,

We have received your Notice of Intent to adopt a Negative Declaration for the Culver Boulevard Realignment and Stormwater Treatment Project in the location of the County of Los Angeles. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

Sincerely,
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

1-1

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

Letter Number: 1
Date Received: December 20, 2018
Commenter/Agency: Gabrieleno Band of Mission Indians/ Kizh Nation

Response to Comment 1-1:

Comment that the Gabrieleno Band of Mission Indians/ Kizh Nation has received the NOI for the proposed project and would like to be consulted if any ground disturbance will be conducted for the proposed project. IS/MND Section 3.4.17, Tribal and Cultural Resources, includes Mitigation Measure TR-1 that requires a Tribal monitor/consultant who is both approved by the Gabrieleno Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities that have the potential to impact tribal cultural resources within the project area. The locations and types of ground disturbing activities to be monitored will be discussed and defined prior to the start of construction activities by mutual agreement with the Project Applicant and the Gabrieleno Band of Mission Indians-Kizh Nation Tribal Government. The Tribal Monitor/Consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources. No issues related to the adequacy of the IS/MND were raised; therefore, no further response is necessary.



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Edmund G. Brown Jr.
Governor

December 21, 2018

Lee Torres, P.E.
Environmental Programs
City of Culver City Public Works Department
9505 W. Jefferson Blvd.
Culver City, CA 90232

MITIGATED NEGATIVE DECLARATION FOR THE CULVER BOULEVARD REALIGNMENT AND STORMWATER TREATMENT PROJECT (PROJECT)

Dear Mr. Torres:

The Department of Toxic Substances Control (DTSC) has received your Notice of Intent to Adopt the Mitigated Negative Declaration for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

2-1

2-2

Mr. Lee Torres
December 21, 2018
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

**2-2
cont.**

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Letter Number: 2
Date Received: January 8, 2019
Commenter/Agency: Pete Cooke, California Department of Toxic Control

Response to Comments 2-1:

Mr. Cooke indicated that the document needs to identify and determine whether current or historic uses at the site have resulted in any release of hazardous waste/substances and the document needs to identify any known or potentially contaminated site(s) within the proposed project area. For identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

Hazards and Hazardous Materials were addressed in Section 3.4.8 of the IS/MND. As noted in the IS/MND, according to the California Environmental Protection Agency list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the project area is not located on a hazardous materials site. As noted under existing conditions, the proposed project site is not located at a known hazardous waste disposal site, hazardous substance release site, or landfill; there are no permitted underground storage tank (UST) facilities documented within the project site (California Environmental Protection Agency, 2018; California Environmental Protection Agency, Department of Toxic Substances Control 2018; California State Water Resources Control Board 2018). No drums or hazardous substances were observed on-site based on information reviewed.

In order to provide additional clarification, the *Environmental Records Review, Culver Boulevard Realignment and Stormwater Treatment Project, Culver City, California*. (Tetra Tech January 18, 2019) (ERR) was prepared and is included as Appendix H in the Final IS/MND.

In addition, the following text was added to the response to question “d” in IS/MND Section 3.4.8.

“The ERR included the following:

- *Research and review of pertinent and readily available historical aerial photographs and topographic maps of the site and surrounding area;*
- *Interaction with appropriate regional and state agencies to review available records and permits;*
- *Acquisition and review of a regulatory agency database report; and*
- *Preparation and submittal of this report summarizing the results of the ERR.*

The ERR methods of investigation included:

Topographic Map Review. *Historical topographic maps obtained through Environmental Data Resources, Inc. (EDR) (EDR 2019) were reviewed to evaluate past land use and site development.*

Aerial Photograph Survey. *Historical aerial photographs obtained through EDR were reviewed and incorporated into this report (EDR 2019). This review consisted of examining the photographs for evidence of previous activities that may affect the environmental condition of the site.*

Agency Contacts. During the course of this assessment, the following agencies/organizations were contacted via email, telephone, personal interviews, and/or record searches for information relating to the site:

- California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR);
- California Environmental Protection Agency (Cal EPA), Department of Toxic Substances Control (DTSC) and
- State Water Resources Control Board (SWRCB).

Regulatory Agency Database and Sanborn Map Search. EDR maintains comprehensive environmental information databases and historical information, including Sanborn Maps, City Directories, and Building Permits, and specializes in providing such data for use in real estate and environmental documents. EDR performed a search of multiple databases containing specific government records, each within a prescribed search radius of the site. The search radii varied from 0.25 to 1 mile depending on the database. The specific search radii for each database are listed in the EDR report. EDR also reviewed their Sanborn Map and City Directory collection for coverage in the site area (EDR 2019).

Based on the information presented in the ERR in Appendix H, it was concluded that:

1. Current or historic uses at the project site have not resulted in any release of hazardous wastes/substances at the project area; and
2. There are no known or potentially contaminated sites within the proposed project area, and there are no conditions at the site that pose a threat to human health or the environment.”

and

“The results of the ERR did not result in any changes to the level of significance. As noted in the draft IS/MND, the project site is not located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Therefore, no project impact would result.”

Response to Comments 2-2:

Mr. Cooke indicated that the document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. If during construction soil contamination is suspected, then construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, then the document should identify required investigation or remediation that will be conducted and identify appropriate government agency for oversight.

As noted above, and in the IS/MND Section 3.4.8, the project site is not located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. In order to provide additional clarification, the following was added to Section 3.4.8 of the IS/MND:

“In the unlikely event that evidence for potentially contaminated soil or groundwater is encountered during the execution of the project, additional site investigation and/or remediation

may be required in accordance with the provisions of California Health and Safety Code Chapters 6.7 and 6.75 if it originates from an UST, or California Health and Safety Code Chapters 6.5 and 6.11 if the source of contamination was from a source other than a UST. Construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the DTSC should be notified and provide regulatory oversight. For sites where it is determined that impacted groundwater exists, the Regional Water Quality Control Board, Los Angeles Region (LARWQCB) should be notified and provide regulatory oversight. For sites where both impacted soil and groundwater is encountered, the DTSC and LARWQCB should be notified and provide regulatory oversight. For sites where underground storage tanks (USTs) are involved, the Los Angeles County Fire Department is the State of California as a Certified Unified Program Agency (CUPA) for Culver City and should be notified and provide regulatory oversight for UST removal and abandonment. The scope of any investigation and/or remediation that would be conducted would be dependent on the type and extent of the contamination encountered and associated regulatory agency requirements.”



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

January 9, 2019

Leonardo.TorresJr@culvercity.org

Lee Torres, Senior Civil Engineer

City of Culver City, Environmental Programs and Operations Division

9505 Jefferson Boulevard

Culver City, CA 90232

Mitigated Negative Declaration (MND) for the Proposed Culver Boulevard Realignment and Stormwater Treatment Facility Project

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency is proposing the construction of an underground stormwater reservoir and the realignment of an approximate 0.45-mile portion of Culver Boulevard between Sepulveda Boulevard and Elenda Street (Proposed Project). Construction of the Proposed Project is expected to occur over 18 months beginning in late 2019. Construction of the proposed underground stormwater reservoir and realignment project components would overlap during the 2019 and 2020 calendar years¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds for construction. While the Proposed Project's air quality impacts from construction were found to be less than significant, as shown in Table 3-3 in the MND², the Proposed Project's daily maximum construction NOx emissions in 2019 would be 92 pounds per day (lbs/day), which is slightly below SCAQMD's regional air quality CEQA significance threshold for NOx (100 lbs/day). Additionally, based on a review of the CalEEMod output file, SCAQMD staff found that the air modeling assumed the use Tier 2 off-road construction equipment³.

Recommended Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. While the Proposed Project's NOx emissions during construction (i.e., approximately 92 lbs/day) were found to be less than significant, to further reduce the NOx emissions resulting from the use of off-road diesel-powered construction equipment and on-road haul trucks during construction, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND.

- a) Require the use of Tier 4 emissions standards or better for off-road diesel-powered construction equipment of 50 horsepower or greater. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or SCAQMD operating

¹ MND. Page 3-11.

² MND. Table 3-3, *Project Construction Emissions of Criteria Pollutants (lb/day)*. Page 3-12.

³ MND. Appendix C. *Air Quality CalEEMod Emission Results*. Pages 2-3.

permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

- b) Require zero-emission or near-zero emission on-road haul trucks, if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil import/export). The Lead Agency should include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- c) Suspend all on-site construction activities when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- d) All trucks hauling dirt, sand, soil or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
- e) Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the California Air Resources Board's policy⁴. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Proposed Project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the Proposed Project site, where appropriate, stating that idling longer than five minutes is not permitted.

**3-1
cont.**

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

3-2

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at (909) 396-2139, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J. D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RD

LAC181218-01

Control Number

⁴ California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.

Letter Number: 3
Date Received: January 9, 2019
Commenter/Agency: Lijin Sun, J.D., South Coast Air Quality Management District

Response to Comment 3-1

Mr. Sun with the SCAQMD provided a summary of the project description and noted that the proposed project's air quality impacts were found to be less than significant in the IS/MND. The daily maximum construction NO_x emissions in 2019 would be 92 pounds per day (lbs/day) which is slightly below SCAQMD's regional air quality significance threshold for NO_x (100lbs/day). Mr. Sun identified that based on the review of the CalEEMod output file the air quality modeling assumed the use of Tier 2 off-road construction equipment. While the impacts were found to be less than significant, the District recommended additional mitigation measures (a-e) in the IS/MND.

As identified in the SCAQMD comment letter, project air quality construction impacts were found to be less than significant. Per CEQA Guidelines Section 15126.4 (3), mitigation measures are not required for effects which are not found to be significant. Thereby, the recommended mitigation measures were not added to the Final IS/MND. However, the City will add these measures (a-e) into the applicable bid documents, purchase orders, and contracts.

Response to Comment 3-2

Mr. Sun notes CEQA Guidelines Section 15074 requirements, requests a written response, and identifies that SCAQMD staff are available if there are any issues or questions. The City will consider the complete environmental record including comments received during the public review process prior to making a decision on the proposed project. All written comments received during the public review period were responded to in writing and included in Appendix I of the Final IS/MND.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, OFFICE OF REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-6536

FAX: (213) 897-1337

*Making Conservation a**California Way of Life!***Letter 4**

January 8, 2019

Lee Torres, P.E.

City of Culver City Public Works Department

9505 W. Jefferson Boulevard

Culver City, CA 90232

**Re: Culver Boulevard Realignment and
Stormwater Treatment Project**

SCH# 2018121033

GTS# 07-LA-2018-02097TD-MND

Dear Lee Torres:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the realignment of Culver Boulevard from Sepulveda Boulevard to Elenda Street and the construction of a subsurface stormwater and urban runoff treatment capture facility along Culver Boulevard.

Caltrans has reviewed the Mitigated Negative Declaration and does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Please keep in mind, an encroachment permit will be required for any project work proposed on or near the Caltrans Right of Way and all environmental concerns must be adequately addressed. Furthermore, please note that traffic control and/or lane closures during construction that may impact I-405 need to be reviewed and approved by the Department of Transportation.

In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2018-02097TD.

Sincerely,


MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

4-1

Letter Number: 4
Date Received: January 9, 2019
Commenter/Agency: Miya Edmonson, California Department of Transportation

Response to Comment 4-1:

Comment that Caltrans has reviewed the MND and does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. An encroachment permit would be needed for any project work on or near the Caltrans Right of Way and lane closures during construction that may impact I-405 need to be reviewed by the Department of Transportation. IS/MND Section 3.4.16, Transportation/Traffic, includes Mitigation Measure TRAF-1 that requires a traffic control plan shall be prepared that includes traffic control measures, haul routes, protocols for notifying emergency providers of temporary lane closures, and coordination with the Transportation Department for any temporary relocation of bus stops. No issues related to the adequacy of the IS/MND were raised; therefore, no further response is necessary.



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

January 14, 2019

VIA EMAIL AND FEDERAL EXPRESS

Mr. Lee Torres
Senior Engineer
City of Culver City,
Environmental Programs and Operations Division
9505 Jefferson Boulevard
Culver City, CA 90232
Leonardo.TorresJr@culvercity.org

Dear Mr. Torres:

Notice of Intent to Adopt a Mitigated Negative Declaration
for the Culver Boulevard Realignment and Stormwater Treatment Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the proposed Culver Boulevard Realignment and Stormwater Treatment Project (Project). The City of Culver City is acting as the Lead Agency under the California Quality Environmental Act (CEQA). The proposed project would continue the widening of Culver Boulevard including separating traffic between eastbound and westbound lanes with a median; and construct an underground urban and stormwater run-off treatment system that would divert capture and treat urban and stormwater run-off from two major storm drains intersecting at Sepulveda Blvd. and Harter Avenue.

Our review of the Notice indicates that Metropolitan owns and operates the Sepulveda Feeder Pipeline and facilities near the proposed project location. The enclosed map shows these facilities in relation to the proposed Project. Metropolitan is concerned with potential impacts to the Sepulveda Feeder and associated facilities that may result from the construction and implementation of the proposed Project. We request that the City of Culver City coordinate with Metropolitan, and ensure that Metropolitan's existing facilities that occur within the project's boundaries are not affected by the project. The Project must not impact Metropolitan's ability to access, operate and maintain existing facilities.

In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for review and written approval. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan's facilities, easements,

5-1

Mr. Lee Torres
Page 2
January 14, 2019

and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to further coordination on this Project. If you have any questions, please contact Mr. Sean Carlson at (213) 217-6276.

Very truly yours,



Sean Carlson
Team Manager, Environmental Planning Section

SAC:sac

SharePoint\NOI for MND Culver Blvd Realignment and Stormwater Treatment Project

Attachments:

- (1) Substructures Guidelines
- (2) Project Maps (2)

**5-1
cont.**

Letter Number: 5
Date Received: January 14, 2019
Commenter/Agency: Sean Carlson, Metropolitan Water District of Southern California

Response to Comment 5-1:

Comment that Metropolitan owns and operates the Sepulveda Feeder Pipeline and facilities near the proposed project location. Metropolitan is concerned with the potential impacts to the Sepulveda Feeder and associated facilities that may result from the construction and implementation of the proposed project. The District requests that the City coordinate with Metropolitan and ensure that Metropolitan's existing facilities that occur within the project's boundaries are not affected (including District's ability to access, operate and maintain existing facilities) by the proposed project. In order to avoid potential conflicts with Metropolitan's right-of-way, they require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for review and approval.

The City believes the construction and operation of the proposed project would not negatively impact the Sepulveda Feeder Pipeline and associated facilities and that the proposed project would not affect the District's ability to access, operate, and maintain the existing facilities within the proposed project limits. The design of the proposed project would provide for approximately 2-feet of vertical clearance between the bottom elevation of the proposed storm drain pipes and the top elevation of the Sepulveda Feeder Pipeline. A copy of the design concept is included in the IS/MND Appendix B, Culver Boulevard Stormwater Capture Project Preliminary Design Concept Report.

At the start of proposed project Culver Boulevard Stormwater Treatment component (May 2018), the City's engineering design team requested and received the following information from Metropolitan Water District of Southern California:

- *A letter confirming that Metropolitan's 94-inch-inside-diameter welded steel Sepulveda Feeder pipeline is located on Sepulveda Boulevard and crosses Culver Boulevard within the proposed project area.*
- *A copy of the District's "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of the Metropolitan Water District of Southern California".*
- *Prints of As-Built Drawing B-54084 and Right-of-Way Map 1800-23 providing plan and profile information relating to the Sepulveda Feeder pipeline.*

The MWD letter provided at that time included the following requests and stipulations:

- *MWD facilities and right-of-way shall be fully shown and identified as Metropolitan's on the project plans.*
- *Due to water quality concerns, the stormwater system proposed within 10-feet from the edge of District pipeline shall include a secondary containment that consists of either continuous steel sleeve or HDPE pipe with fusion-welded joints.*
- *The project plans shall include a general note requiring the Contractor to notify Kevin Johansen of the MWD Water System Operations Group at least two working days prior to starting any work in the vicinity of MWD facilities.*
- *Additional correspondence with MWD relating to the project should be made through Ken Chung of the MWD Substructures Team.*

- *Prints of the preliminary plans be submitted for review and written approval as they pertain to MWD facilities, with all applicable portions of the District's guidelines incorporated into the plans.*

The information provided by MWD was used to guide applicable portions of the design. The City will continue to coordinate with MWD and will submit design plans for activity in the area of Metropolitan's pipelines or facilities for review and approval.

Placeholder Letter 6



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Letter 6

January 14, 2019

Lee Torres
Culver City
9505 W. Jefferson Blvd
Culver City, CA 90232

Subject: Culver Boulevard Realignment and Stormwater Treatment Project
SCH#: 2018121033

Dear Lee Torres:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 11, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018121033
Project Title Culver Boulevard Realignment and Stormwater Treatment Project
Lead Agency Culver City

Type MND Mitigated Negative Declaration
Description The Culver Boulevard Realignment and Stormwater Treatment Project consists of two major components. The first major component is the Culver Boulevard Realignment from Sepulveda Boulevard to Elenda Street. The second component is the Culver Boulevard Stormwater Treatment feature, consisting of the construction of a subsurface stormwater and urban runoff treatment capture facility along Culver Boulevard beneath the existing median. New traffic signals are proposed at the intersections of Harter Ave and Huron Ave.

Lead Agency Contact

Name Lee Torres
Agency Culver City
Phone 310-253-6457 **Fax**
email
Address 9505 W. Jefferson Blvd
City Culver City **State** CA **Zip** 90232

Project Location

County Los Angeles
City Culver City
Region
Lat / Long 34° 00' 27.9" N / 118° 24' 26.9" W
Cross Streets Sepulveda Blvd and Elenda St
Parcel No. ROW-N/A

Township	Range	Section	Base
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Proximity to:

Highways 405, 187, 10, 90
Airports
Railways
Waterways Ballona Creek
Schools Various
Land Use transportation/transportation/OS

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; State Water Resources Control Board, Division of Water Quality; State Water Resources Control Board, Division of Water Rights; Air Resources Board, Transportation Projects

Date Received 12/13/2018 **Start of Review** 12/13/2018 **End of Review** 01/11/2019

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, OFFICE OF REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-6536

FAX: (213) 897-1337



Making Conservation a

California Way of Life!

Governor's Office of Planning & Research

January 8, 2019

JAN 09 2019

Lee Torres, P.E.

City of Culver City Public Works Department **STATE CLEARINGHOUSE**

9505 W. Jefferson Boulevard

Culver City, CA 90232

**Re: Culver Boulevard Realignment and
Stormwater Treatment Project**

SCH# 2018121033

GTS# 07-LA-2018-02097TD-MND

Dear Lee Torres:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the realignment of Culver Boulevard from Sepulveda Boulevard to Elenda Street and the construction of a subsurface stormwater and urban runoff treatment capture facility along Culver Boulevard.

Caltrans has reviewed the Mitigated Negative Declaration and does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Please keep in mind, an encroachment permit will be required for any project work proposed on or near the Caltrans Right of Way and all environmental concerns must be adequately addressed. Furthermore, please note that traffic control and/or lane closures during construction that may impact I-405 need to be reviewed and approved by the Department of Transportation.

In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2018-02097TD.

Sincerely,


MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

SC# 2018121033



Department of Toxic Substances Control

Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

December 21, 2018

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1/11/19
E

Governor's Office of Planning & Research

Lee Torres, P.E.
Environmental Programs
City of Culver City Public Works Department
9505 W. Jefferson Blvd.
Culver City, CA 90232

JAN 07 2019

STATE CLEARINGHOUSE

MITIGATED NEGATIVE DECLARATION FOR THE CULVER BOULEVARD REALIGNMENT AND STORMWATER TREATMENT PROJECT (PROJECT)

Dear Mr. Torres:

The Department of Toxic Substances Control (DTSC) has received your Notice of Intent to Adopt the Mitigated Negative Declaration for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Mr. Lee Torres
December 21, 2018
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pete Cooke', with a long horizontal flourish extending to the right.

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

November 26, 2018

TO: CEQA LEAD AND REVIEWING AGENCIES

RE: ANNOUNCEMENT OF CHANGE, NEW CEQA DATABASE

The Office of Planning and Research, State Clearinghouse (SCH) is preparing the transition to a new CEQA database. We would like to inform you that our office will be transitioning from providing hard copies of certain letters and notices to an electronic mail system. Copies of environmental documents, notices and comment letters from state agencies will also be available for view and download.

CEQA lead and reviewing agencies should include an e-mail address (at least one (1)) to receive electronic notifications.

The letters and notifications from the SCH that will now be e-mailed include: acknowledgement of receipt and close of environmental documents, comments received from state reviewing agencies on environmental documents, as well as notices of determinations and exemptions.

Updates on when the database will be accessible for lead agencies to upload and submit environmental documents and notices, along with the ability for state agencies to review and comment on environmental documents through the database, will be provided as those functions become available.

For this transition process, please send your e-mail address to:

State.clearinghouse@opr.ca.gov

Should you have any questions, please do not hesitate in contacting the State Clearinghouse at (916) 445-0613 or state.clearinghouse@opr.ca.gov.

Letter Number: 6
Date Received: January 22, 2019
Commenter/Agency: Lee Torres, Governor's Office of Planning and Research,
State Clearinghouse and Planning Unit

Response to Comment 6-1:

General comment that the City has complied with the State Clearinghouse requirements for draft environmental documents pursuant to the CEQA, provided the State Clearinghouse Number (SCH) for the project (SCH# 2018121033), and provided additional copies of Letter 2 and 4, and Announcement of Change for a New CEQA Database. Response to comments for Letters 2 and 4 are provided above. No issues related to the adequacy of the IS/MND were raised; therefore, no further response is necessary.