Draft Initial Study/ Mitigated Negative Declaration Culver Boulevard Realignment and Stormwater Treatment Project

PRESENTED TO

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TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

APPENDICES

1.0 INTRODUCTION

1.1 INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for Culver City (City) by Tetra Tech to evaluate whether the proposed new Culver Boulevard Realignment and Stormwater Treatment Project (proposed project) would have a significant effect on the environment. Culver City acting as the Lead Agency, may prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment. According to State CEQA Guidelines Section 15070, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.2 REQUIRED CONTENT

A Negative Declaration circulated for public review shall include:

(a) A brief description of the project, including a commonly used name for the project, if any;

(b) The location of the project, preferably shown on a map, and the name of the project proponent;

(c) A proposed finding that the project will not have a significant effect on the environment;

(d) An attached copy of the Initial Study documenting reasons to support the finding; and

(e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

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2.0 PROJECT INFORMATION

Project title:	Culver Boulevard Realignment and Stormwater Treatment Project
Lead agency name and address:	City of Culver City, Public Works Department 9770 Culver Blvd., Culver City, CA 90232
Contact person and phone number:	Lee Torres P.E. (310) 253-6457
Project location:	The project area is located on Culver Boulevard and Little Culver Boulevard between Sepulveda Boulevard and Elenda Street in the City of Culver City, Los Angeles County.
Nearest Cross Street:	Sepulveda Boulevard and Elenda Street
Assessor Parcel Number (APN):	Not Applicable (City Right of Way)
Project sponsor's name and address:	City of Culver City, Public Works Department 9770 Culver Boulevard, Culver City, CA 90232
General Plan Designation:	Open Space
Zoning Designation:	Transportation
Surrounding land uses:	North: Mostly Residential with Veteran's Memorial Park approximately 0.2 miles from the project site (Recreational). East: Mostly Residential with Culver City High School approximately 0.2 mile east from the project site, Culver City Middle School approximately 0.4 mile from the project site, and Farragut Elementary School approximately 0.5 mile from the project site (Educational Institutions – Commercial and Services). South: Mostly Residential with Commercial buildings along Sepulveda Blvd. and I-405 (Major Roadway – Transportation) West: Mostly Residential with Commercial buildings along Sepulveda Blvd. and Washington Blvd., and Tellefson Park approximately 0.3 miles from the project site (Recreational).

2.1 ENVIRONMENTAL SETTING

The project site is located in the City of Culver City, Los Angeles County, on an approximate 0.45-mile length of Culver Boulevard, between Sepulveda Boulevard and Elenda Street. A project vicinity map is provided as Figure 2-1. The existing street has 180-feet right-of-way and is configured with a 60-feet wide parkway and residential roadway on the north side, a 60-feet center island greenbelt, and another 60-feet arterial roadway and parkway on the south side. The south side carries almost all the through traffic on two lanes in each direction with

narrow parking on 1 side only. At Culver Boulevard and Harter Avenue intersection there is no signal. At the existing Culver Boulevard and Huron Avenue intersection, the signal is semi-actuated with only northbound approach lane having detection.

Culver Boulevard, within the project limits, is classified as a Primary Arterial in the General Plan Circulation Element with a posted speed limit of 40 miles per hour. Culver Boulevard's configuration west of Elenda Street and east of Sepulveda Boulevard mainly consists of a 50-foot wide main roadway with two lanes in each direction and parking on the south side, a local 50-foot wide roadway known as "little" or "north" Culver Boulevard with one lane in each direction and parking on both sides, a 60-foot wide landscaped bicycle/pedestrian median (formerly the Southern Pacific Transportation Company property) separating the two roadways, and a 10-foot wide parkway on each side.

The main roadway is the southern third of the 180-foot wide street right-of-way; "little" Culver Boulevard is in the northern third; and the median constitutes the middle third of the right-of-way.

2.2 BACKGROUND

The City of Culver City (City) is a charter city incorporated in 1917. The City is governed by a five-member City Council whose members are elected at large and operates under a Council/City Manager form of government. Culver City is a full-service city located in the western area of Los Angeles County, generally situated north of Los Angeles International Airport, southeast of Santa Monica, south of Beverly Hills and southwest of West Hollywood. The City is approximately five square miles with a residential population of approximately 40,000.

The Culver Boulevard Realignment and Stormwater Treatment Project (Proposed 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 treatment capture facility along Culver Boulevard beneath the existing median. New traffic signals are proposed at the intersections of Harter Avenue and Huron Avenue.

The Culver Boulevard Realignment component is the continuation of the widening of Culver Boulevard that was completed by Caltrans as part of the 405 Freeway widening in 2009. The objective of this feature will be to resolve traffic issues along this reach of Culver Boulevard; and provide for a safer and more aesthetically pleasing street. The eastbound and westbound lanes of traffic is proposed to be separated with a new raised median.

The Culver Boulevard Stormwater Treatment component was incorporated as part of this project in 2016 as part of the City's commitment towards addressing water quality issues with Ballona Creek. As a result, this feature will address the Los Angeles Regional Water Quality Control Board's Municipal Separate Storm Sewer System Permit (Order No R4-2012-0175) and the City's responsibility under the Ballona Creek Watershed Enhanced Watershed Management Program (EWMP). This feature consists of a subsurface storage reservoir to treat and filter stormwater runoff. Some of the captured urban run-off will be stored and used to irrigate the local landscaping proposed along the raised median through sub-surface drip lines. The subsurface reservoir will be constructed under the raised landscaped median which serves as a bikeway and pedestrian pathway between Culver Boulevard and little Culver Boulevard. Additionally, BMPs such as bio-swales will be included in the landscape design to address surface run-off from Culver Boulevard.

The City's initial outreach efforts to coordinate the Culver Boulevard Realignment component included Community Meetings on January 21, 2014, and May 20, 2014. A third Community Meeting was held on October 3, 2017, in which the City provided an updated on the Realignment Project and shared the City's plans to incorporate the Stormwater Treatment component of the project.

In response to the input from the local community, the City established a Citizens Advisory Committee to provide early feedback and input on project components, prior to each Community Meeting. The City's project team addressed comments from the community related to the realignment, traffic safety, signage, landscaping features,

and stormwater features. The City met with the Citizens Advisory Committee on April 26, 2018, July 9, 2018, and September 18, 2018. Community Meetings were held on May 15, 2018, July 17, 2018, and October 2, 2018.

2.3 PROJECT DESCRIPTION

The City of Culver City (City) Department of Public Works desires to construct the proposed project. The Culver Boulevard realignment portion of the project is the continuation of the widening of Culver Boulevard that was completed by Caltrans as part of the 405 Freeway widening in 2009. The proposed project would improve the efficiency of traffic flow and provide for a safer and more aesthetically pleasing street. The eastbound and westbound lanes of traffic are proposed to be separated with a new raised median. New traffic signals are proposed at the intersections of Harter Avenue and Huron Avenue.

The Culver Boulevard Realignment portion of the proposed project would realign an approximate 0.45-mile length of Culver Boulevard, between Sepulveda Boulevard and Elenda Street in the City. The project would include realigning and reconstructing the landscaped median and bikeway/pedestrian facilities, reconfiguring/restriping existing travel lanes and crosswalks, incorporating native and low water use landscaping, and additional street lights. The proposed roadway and landscape improvements are identified on Figure 2-2. The realignment portion would also incorporate the stormwater capture component.

The roadway scope includes:

- Shift the northerly landscaped median curb approximately 16-feet northerly and reduce its width by 2-feet, and on the southern roadway add left turn movement capacity.
- Separate the Culver Boulevard eastbound and westbound traffic with a raised 8-foot median.
- Improve traffic safety and pedestrian mobility by adding signals at Huron Avenue and Harter Avenue.
- Create a 5-foot-wide buffer between parked vehicles and traffic on the south side of Culver Boulevard.
- Improve access for pedestrians crossing Culver Boulevard at Harter Avenue and Huron Avenue.
- Improve access for motorists turning left onto and from “little” Culver Boulevard.
- Reestablish the median grading, landscaping and irrigation.
- Reestablish and improve the bikeway and pedestrian paths in the median.
- Save or replace mature trees.
- Improve lighting and replace sidewalks to enhance safety and improve the pedestrian experience.

Traffic signal warrants will be prepared to justify the proposed new signals, design, and preparation of technical specification for new traffic signals at the Harter Avenue and Huron Avenue intersections. The traffic signal plans will include the design of an intersection safety lighting system.

There is an existing interconnect cable on the south side of Culver Boulevard under the sidewalk and the new traffic signals will be spliced to it. The City is currently replacing all traffic signal controllers in the City with new Type 2070 Controllers. A new Adaptive Traffic Control System will also be installed.

The existing streetlight system is on a high voltage system. Existing streetlight poles will be placed, and new low voltage streetlight systems will be installed.

One catch basin at Harter Avenue is being relocated approximately 50-feet. Its lateral reconnection to the main will need to be coordinated with and approved by the County of Los Angeles in concert with the storm drain work being done for the Storm Water Treatment Project, further described below.

There would be no increase in roadway capacity because no additional through lanes on Culver Boulevard or Little Culver Boulevard would be added. To accommodate the realignment of the landscaped median, Little Culver Boulevard would be narrowed but, existing parking along the south side of Little Culver Boulevard would remain. The project includes the addition of a signal at Huron Street and shifting of an existing opening at Little Culver

Boulevard. Please refer to Appendix A, Preliminary Design Report for the Realignment of Culver Boulevard Between Sepulveda Boulevard and Elenda Street Project PZ 460 for additional design details.

The project also includes a stormwater treatment component. In order to comply with the Los Angeles Regional Water Quality Control Board's Municipal Separate Storm Sewer System Permit (Order No R4-2012-0175) and the EWMP, the City is proposing to incorporate structural storm water Best Management Practices (BMPs) as part of the proposed project. The proposed layout of the stormwater treatment component is identified on Figures 2-3 and 2-4.

The Culver Boulevard Stormwater Treatment component would include an underground storage reservoir beneath the landscaped median and portions of the roadway. The storage reservoir would consist of modular precast concrete units placed on prepared subgrade. The structure would connect to the surrounding storm drain network, specifically the Harter Avenue drain (BI 2901 – U2 Line B) and the Sepulveda Boulevard drain (Culver City Unit 4 Line A), as well as the runoff within the respective drainage areas. Both drainages discharge to Ballona Creek approximately 0.5 mile southeast of the project area. The primary design goal of the stormwater capture component is to reduce long term annual loading of pollutants to the Ballona Creek Watershed Management Area. The captured water is used to fully meet the water demands of the median landscaping through subsurface drip lines. In addition, after treatment, captured water may provide an alternate non-potable water source to offset irrigation water use at the nearby Veterans Memorial Park, which is located approximately 0.5 miles north on Culver Boulevard.

The stormwater capture component proposes to divert from two locations. The Harter Avenue drain, a 66-inch reinforced concrete pipe (RCP) will be designed to divert runoff at a rate of 25 cubic feet per second (cfs), via a diversion sump structure. The Sepulveda Boulevard drain, an 87-inch reinforced concrete arch (RCA) storm drain will be designed to divert runoff at 25 cfs for a total diversion of 50 cfs.

The diverted stormwater will be directed to a pretreatment device prior to entering the stormwater storage reservoir. With a goal of removing 80% of total suspended solids, effective capture of sediments before they enter the storage unit will allow a long-life expectancy for the concrete unit.

The pre-treated stormwater will be directed to an approximate 0.88-acre underground stormwater capture reservoir, providing approximately 8 acre-feet of storage volume. The underground storage reservoir will primarily be placed beneath the Culver Boulevard median and pedestrian/bike path. A small portion of the storage reservoir will extend underneath the Culver Boulevard roadway section at the southern extent of the median where the median narrows to accommodate a right-turn pocket on the southbound side of Culver Boulevard. Captured stormwater will be pumped out of the reservoir via a new pump station and will be conveyed to post-storage filtration devices, treating stormwater at approximately 5.76 cfs, prior to discharging into the Harter Ave drain.

All improvements would be completed within the City's existing right of way (ROW); therefore, no easements, including temporary construction easements (TCE), would be required. Removal of vegetation (i.e., ornamental landscaping) and street trees is anticipated Traffic flow may be temporarily affected during construction. Minor traffic control may be necessary during the trenching activities for the storm drains and discharge lines as well as for the hauling of export from the project during the excavation phase. A traffic control plan will be prepared by the contractor to accommodate this work. Utilities are located within the project area; however, utility relocations would be minimized. One significant abandoned utility is a quit-claimed 10" oil line that travels down the center of the existing median. The project will remove the conduit during reservoir construction and then re-install the line in the original location which will pass above the reservoir. The line was quit-claimed to the City of Culver City in the 1990s and the pipe is assumed to have been cleaned and inspected prior to being turned over to the City. Please refer to Appendix B, Culver Boulevard Stormwater Capture Project Preliminary Design Concept Report for additional design details.

The project is listed in the Southern California Association of Governments (SCAG) 2012-20135 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2015 Federal Transportation

Improvement Program (FTIP) under Project ID LAF3175 (Southern California Association of Governments 2012; Southern California Association of Governments 2014).

Construction Details

During the demolition and excavation phases, an arborist and a Native American Monitoring specialist will be onsite during working hours. The arborist will monitor construction activities to ensure that the onsite trees and their root systems are being protected. Native American Monitoring specialist will monitor construction activities to ensure that construction is temporarily stopped if any cultural resource artifacts are uncovered.

Culver Boulevard Realignment Component

Construction is anticipated to begin in the third quarter of 2019 and last approximately 18 months. Construction of the realignment component will include approximately 400 working days of construction during normal working days and hours (Monday through Friday, except federal holidays). This will include the following specific construction phases: 55 days for mobilization, clearing, grubbing, and demolition; 45 days for excavation and utility relocation; 105 days for fine grading and paving; and 195 days for landscaping, electrical service, and traffic signals. Construction will require approximately 48 workers.

The realignment component would require grading of approximately 4.73 acres. For the purpose of this analysis excavated debris and soil are expected to be hauled to a landfill, reclamation or reuse facility within approximately 32 miles of the project site. The amount of debris and soil to be excavated and hauled from the project site and the amount of aggregate material to be delivered to the project site is shown below in Table 2-1. The anticipated personnel and equipment for the realignment component is provided in Table 2-2.

Table 2-1 Material Export and Import for Realignment Component

Phase	Total Soil/Debris Export Amount (CY)	Daily Soil/Debris Export Amount (CY)	Total Aggregate Import Amount (CY)	Total Aggregate Import Amount (CY)
I	3,817	273	0	0
II	5,125	366	0	0
III	0	0	3,007	181
IV	0	0	0	0
Total	**8,942**		**3,007**	

Table 2-2 Anticipated Personnel and Equipment Realignment Component

Construction Phase	Equipment (Quantity)	Number of Personnel Per Equipment Type
Mobilization/Clearing & Grubbing/ Pavement Removal	Concrete/Industrial Saws (1)	1
	Excavator (1)	1
	Off-Highway Trucks (3)	2
	Pavement Breaker (1)	1
	Rubber Tired Dozers (2)	1
Excavation/Utility Installation	Air Compressor (1)	1
	Concrete/Industrial Saws (1)	1

Construction Phase	Equipment (Quantity)	Number of Personnel Per Equipment Type
	Cranes (1)	3
	Off-Highway Trucks (4)	2
	Rollers (1)	1
	Tractors/Loaders/ Backhoes (4)	1
	Trenchers (1)	1
Fine Grading/Paving	Cement Mortar Mixers (1)	2
	Off-Highway Trucks (2)	2
	Pavers (3)	2
	Rollers (1)	1
	Skid Steer Loaders (2)	1
Landscaping/Electrical/Traffic Signals	Sweepers/Scrubbers (2)	1
	Tractors/Loaders/ Backhoes (1)	1

Culver Boulevard Stormwater Treatment Component

Construction is anticipated to begin in the second quarter of 2019 and last approximately 14 months. Construction of the stormwater capture component will include approximately 308 working days of construction during normal working days and hours (Monday through Friday, except federal holidays). This will include the following specific construction phases: 35 days for mobilization, clearing, grubbing, and demolition; 92 days for excavation, trenching, and rough grading; 109 days for subgrade/utility installation and treatment systems; and 72 days for backfilling, fine grading, electrical systems and controls. Construction will require approximately 63 workers.

The stormwater capture component would require grading of approximately 1.15 acres. This would include the storage area and the area of excavation required for installing the pumps and pipelines. The construction of the underground storage system would require excavation to a maximum depth of 27 feet for the storage system and 30 feet for the pretreatment and pump station. For the purpose of this analysis excavated debris and soil are expected to be hauled to a landfill, reclamation or reuse facility within approximately 32 miles of the project site. The amount of debris and soil to be excavated and hauled from the project site and the amount of aggregate material to be delivered to the project site is shown in Table 2-3. The anticipated personnel and equipment for the stormwater treatment component is provided in Table 2-4.

Table 2-3 Material Export and Import for Stormwater Treatment Component

Phase	Total Soil/Debris Export Amount (CY)	Daily Soil/Debris Export Amount (CY)	Total Aggregate Import Amount (CY)	Total Aggregate Import Amount (CY)
I	930	185	0	0
II	24,400	480	0	0
III	0	0	5,100	570
IV	0	0	0	0
Total	**25,330**		**5,100**	

Table 2-4 Anticipated Personnel and Equipment for Stormwater Treatment Component

Construction Phase	Equipment (Quantity)	Number of Personnel Per Equipment Type
Mobilization/Clearing & Grubbing/ Pavement Removal	Concrete/ Industrial Saws (1)	1
	Excavators (1)	1
	Off-Highway Trucks (2)	2
	Pavement Breaker (1)	1
	Rubber Tired Dozers (1)	1
Excavation/ Trenching/Rough Grading	Concrete/ Industrial Saws (1)	1
	Off-Highway Trucks (5)	2
	Rollers (2)	1
	Tractors/Loaders/Backhoes (5)	1
	Trenchers (2)	1
Subgrade/Utility Installation/ Treatment System	Air Compressor (1)	1
	Cranes (2)	3
	Off-Highway Trucks (11)	2
	Skid Steer Loaders (4)	1
Backfill/Fine Grading/Electrical & Controls	N/A	N/A

Maintenance Activities

Operation and maintenance of the stormwater capture component include: continuous monitoring of active controls; monthly inspection and cleaning of diversion structures and vacuuming of the pretreatment device; quarterly inspection and cleaning of the storage unit; and as needed inspection and cleaning of the pump station.

2.4 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

Other public agencies whose approval is required for permits, financing approval, or participation agreement, for example, is as follows:

- State Water Resources Control Board (SWRCB);
- Los Angeles County Department of Public Works;
- Municipal Water District;
- Golden State Water Company;
- Southern California Gas;
- South Coast Air Quality Management District; and
- Southern California Edison.

2.5 CALIFORNIA NATIVE AMERICAN TRIBES CONSULTATION

In accordance with AB 52, the City of Culver sent consultation letters to Native American individuals on October 31, 2018. The following contacts were sent letters:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation
- Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseno Indians

On November 2, 2018, Mr. Ontiveros responded by telephone to Mr. Lee Torres, P.E., Environmental Programs for the City of Culver, that the tribe does not request consultation for the proposed project.

Chairperson Salas responded to Mr. Torres that he did want consultation and a conference call was conducted on November 6, 2018. Mr. Salas indicated the project area is highly sensitive for tribal cultural resources and that such resources may be encountered inadvertently during construction activity. Mr. Salas requested to be informed regarding construction activity and requested tribal monitoring during all construction activities and provided tribal mitigation measures to be implemented during project activities (Appendix G).

3.0 ENVIRONMENTAL CHECKLIST

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Tribal Cultural Resources	☐ Utilities/Service Systems
☐ Mandatory Findings of Significance		

3.2 DETERMINATION: (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Lee Torres 12/12/18			
Signature	Date	Signature	Date
Lee Torres			
Print Name		Print Name	

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

(1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(2) All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(3) Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

(4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross referenced).

(5) Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:

a. Earlier Analysis Used. Identify and state where earlier analyses are available for review.

b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.

(7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

(8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(9) The explanation of each issue should identify:

a. The significance criteria or threshold, if any, used to evaluate each question, and

b. The mitigation measure identified, if any, to reduce the impact to a less than significant level.

3.4 ENVIRONMENTAL IMPACT ANALYSIS

3.4.1 AESTHETICS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Have a substantial adverse effect on a scenic vista?			X	
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Existing Conditions:

The project site is an existing roadway in Culver City that provides I-405 access approximately 500 feet southwest of the project area and to several community facilities and destinations along Culver Boulevard. The project area has a landscaped median between Culver Boulevard and Little Culver Boulevard, with a row of trees and landscaping lining the bike path and pedestrian walkway.

The project site is not located within the vicinity of a designated or eligible state scenic highway based on a review of the California Scenic Highway Mapping System (Caltrans 2018).

Discussion:

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista can be defined as a public viewpoint that provides expansive views of a highly-valued landscape. The project site is located within a developed urban environment and there are no known scenic vistas located within the project area. The project site is an existing roadway in Culver City that provides I-405 access approximately 500 feet southwest of the project area and to several community facilities and destinations along Culver Boulevard. The project area has a landscaped median between Culver Boulevard and Little Culver Boulevard, with a row of trees and landscaping lining the bike path and pedestrian walkway. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. Except for traffic signals and the replacement street lighting, no tall structures would be introduced as part of the proposed project and distant views of the surrounding environment would be similar to existing conditions. Therefore, project impact would be less than significant.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The project site is not located within the vicinity of a designated or eligible state scenic highway based on a review of the California Scenic Highway Mapping System (Caltrans 2018). Therefore, no project impact would result.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Culver Boulevard and Little Culver Boulevard are paved roadways that pass through a medium-density residential area. The landscaped median between Culver Boulevard and Little Culver Boulevard adds to the visual character and quality of the project area, with a row of trees and ornamental landscaping lining the bike path and pedestrian walkway. There are street trees, street lights, and utility poles lining the south side of Culver Boulevard, and street trees and street lights on the north side of Little Culver Boulevard. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project would require some changes to existing landscaping and would include alterations to the existing roadway configuration. However, the proposed landscaping seeks to provide a consistent, harmonious and aesthetic blend of hardscape, pathways, trees, bushes and ground cover. Significant trees in the large median that can be retained will be protected including three existing Canary Island Pine Trees near Culver Boulevard and Center Street. The landscaped berm with trees will provide buffer in some places. The irrigation proposed will be a drip system and plants will be selected for drought tolerance. The parkways will be planted with a consistent landscape theme in accordance with the City's Parkway Landscape Guidelines (Appendix A). Therefore, the proposed project would not substantially degrade the existing visual character or quality and project impact would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is an existing roadway within a developed urban environment. Existing sources of lighting in the project area are streetlights along the south side of Culver Boulevard and the north side of Little Culver Boulevard, and traffic signals on Culver Boulevard at its intersection with Sepulveda Boulevard, Huron Avenue, and Elenda Street. Vehicles on the roadways are additional sources of daytime glare from their reflective surfaces, as well as nighttime lighting and glare from vehicle headlights.

The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The existing streetlight system is on a high voltage system and the existing streetlight poles would be removed and new low voltage streetlight systems would be installed. The following city street lighting improvements are proposed as part of the project: 1) Remove existing series circuit along Culver Boulevard between Sepulveda Boulevard and Elenda Street; 2) Install new Ameron concrete type 22CT10 pole with single acorn luminaire LED by True Green Solutions Model No. 318036-26-X-X-E39 for both the pedestrian walkway and the bike path; and, 3) Install new Ameron concrete type 1C322 pole with CJ-8 foot aluminum davit arm assembly and 150-250W HPS by Crystal Lighting, and 4) Add low-level path light bollards along the pedestrian and bike paths. While the proposed project would make lighting improvements, given the location within a developed urban environment and that some of the new lighting would replace the existing street lighting, project impact would be less than significant.

Mitigation Measures:

No mitigation measures are required.

3.4.2 AGRICULTURE AND FOREST RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				X
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				X

Existing Conditions:

The project site is located within a developed urban environment and there are no agricultural or forestry lands located on, or adjacent to, the project site. The project site is zoned for transportation and currently used as such (City of Culver City, 2007).

Discussion:

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. There is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on, or adjacent to, the project site (CDC, 2018). Therefore, the proposed project would not convert farmland to non-agricultural uses and no project impact would result.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned for transportation. The project site is currently utilized for transportation and would continue to do so with implementation of the proposed project. Therefore, the proposed project would not conflict with existing zoning and no project impact would result.

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value (CDC 2018). The project site is located within City right-of-way within a developed urban environment and is not subject to a Williamson Act Contract. Therefore, no project impact would result.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site is located within a developed urban environment. There is no forest land (i.e., land with 10 percent tree coverage, as defined in Public Resources Code section 12220(g)) or timberland on or adjacent to the project. Therefore, no project impact would result (City of Culver City, 2007).

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site is located within a developed urban environment and there is no forest land on or adjacent to the project site. Therefore, no project impact would result.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The proposed project would not involve changes to the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use. As identified above, the project site is located within a developed urban environment and there are no agricultural uses on or adjacent to the project site. Therefore, no project impact is would result.

Mitigation Measures:

No mitigation measures are required.

3.4.3 AIR QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Conflict with or obstruct implementation of the applicable air quality plan?			X	
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d.	Expose sensitive receptors to substantial pollutant concentrations?			X	
e.	Create objectionable odors affecting a substantial number of people?		X		

Existing Conditions:

Pursuant to the Clean Air Act Amendments of 1990, the USEPA has established National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The NAAQS are classified as primary and secondary standards. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects. NAAQS are established for six pollutants (known as criteria pollutants): ozone (O_3), particle pollution (i.e., respirable particulate matter less than 10 microns in diameter [PM_{10}] and respirable particulate matter less than 2.5 microns in diameter [$PM_{2.5}$]), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). The California Air Resources Board (CARB) has also established its own air quality standards in the state of California, known as the California Ambient Air Quality Standards (CAAQS). The CAAQS are generally more stringent than the NAAQS and include air quality standards for all the criteria pollutants listed under NAAQS plus sulfates (SO_4), hydrogen sulfide (H_2S), vinyl chloride, and visibility-reducing particulate matter.

The USEPA classifies the air quality within an Air Quality Control Region with regard to its attainment of federal primary and secondary NAAQS. An area with air quality better than the NAAQS for a specific pollutant is designated as being in attainment for that pollutant. Any area not meeting the NAAQS is classified as a nonattainment area. Where there is a lack of data for the USEPA to make a determination regarding attainment or nonattainment, the area is designated as unclassified and is treated as an attainment area until proven otherwise. Similarly, the CARB makes state area designations for the state criteria pollutants.

The proposed project is within Los Angeles County, which is subject to the South Coast Air Quality Management District (SCAQMD) regulations. Pollutant concentrations within the Los Angeles County are assessed relative to both the federal and state ambient air quality standards. Los Angeles County is in attainment for all federal

standards except O_3, $PM_{2.5}$, Pb, and all state standards except O_3, $PM_{2.5}$, and PM_{10} standards (CARB 2017). Applicable SCAQMD rules are presented in Table 3-1.

Table 3-1 Applicable Rules

Rule	Title
401	Visible Emissions
402	Nuisance
403	Fugitive Dust

Rule 401 prohibits the discharge of visible emissions, with respect to Ringelmann Chart Shades Number 1 and Number 2, for a period or periods aggregating more than three minutes in any one hour.

Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Rule 403 requires control measures for fugitive dust from active operations, open storage piles, or disturbed surface areas and prohibits activities that would cause visible dust emissions of 20 percent. The rule also includes provision for mitigating fugitive dust emissions (e.g., watering the site during grading and properly covering truck beds when hauling soil or other material).

Discussion:

a. Would the project conflict with or obstruct implementation of the applicable air quality plans?

Less than Significant Impact. The project site is located within the City of Culver City within the Los Angeles County and within the SCAQMD, which oversees the welfare of air quality in Los Angeles County. The SCAQMD promotes air quality improvement though air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and support and implementation of measures to reduce emissions from motor vehicles.

The federal CAA requires states to develop plans, known as State Implementation Plans (SIPs), stating how they will attain or maintain NAAQS. SIPs are a compilation of new and previously approved plans, programs, district rules, state regulations and federal controls. States and local air quality management agencies prepare SIPs for approval by the USEPA. To this end, the SCAQMD in conjunction with the California Air Resources Board, the Southern California Association of Governments (SCAG) and the USEPA have prepared the Final 2016 Air Quality Management Plan (AQMP or Plan) to ensure continued progress toward clean air and reach federal and state compliance requirements over the next two decades.

The AQMP incorporates emissions projections based on growth forecasts accounted for in local and regional general plans. Local governments maintain the authority to determine the types of land use that are allowed within their jurisdiction. For example, in city general plans, each parcel of land within that city is given a land use designation (i.e., residential, industrial, etc.). Developments that do not comply with general plan designations are inconsistent with the general plan. A proposed project that is inconsistent with a local general plan is also inconsistent with the AQMP.

The project site consists of a section that has a land use designation qualified as Open Space in the City of Culver City General Plan (Culver City 2007) and a roadway section. The project site is currently used as a public roadway

and with implementation of the proposed project the site would continue to operate as a public roadway. No change in land use designation is proposed and operation would remain consistent with the land use identified within the Culver City General Plan and thereby, also with the AQMP. The project is also budgeted in the Southern California Association of Governments (SCAG) 20126-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2017 Federal Transportation Improvement Program (FTIP) under Project ID LAF3175. Therefore, project impact would be less than significant.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Significance thresholds are established to assist lead agencies in determining whether a project may have a significant air quality impact. Projects with emissions below established thresholds will not have a significant impact on air quality. Projects with emissions equal to or exceeding the established significance threshold will have a potentially significant adverse impact on air quality.

Since the proposed project is within the jurisdiction of the SCAQMD air quality significance thresholds established by the SCAQMD are used as a reference to determine whether the proposed project's air emissions have a significant impact on air quality. A summary of the SCAQMD air quality significance thresholds is presented in Table 3-2.

Table 3-2 SCAQMD Air Quality Significance Thresholds

Pollutant	Construction (lb/day)	Operation(lb/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Notes:

CO	carbon monoxide
lb/day	pounds per day
NOx	oxides of nitrogen (nitric oxide and nitrogen dioxide)
PM2.5	respirable particulate matter less than 2.5 microns in diameter
PM10	respirable particulate matter less than 10 microns in diameter
SCAQMD	South Coast Air Quality Management District
SOx	oxides of sulfur
VOC	volatile organic compounds

Air emissions originate from construction and/or operation of a project. Construction emissions are temporary emissions occurring only while a project is being constructed and end when construction is complete. Operation emissions are long-term and begin once a project starts day to day operations.

Operation Emissions

The proposed project includes a roadway realignment and construction of a storm water infiltration system within Culver Boulevard. Except for a small building supporting a water quality treatment system all the storm water infiltration system components (e.g., vaults, pipes, and storage) would be installed underground, rendering only a small visible change to the site.

Once the proposed project is constructed, Culver Boulevard would be realigned with no increase in capacity and its operations would resume to similar to pre-construction conditions. The only day-to-day operational activities added by the proposed project would be the cycling of the pumps, which would operate on electricity and would not be expected to generate direct emissions of criteria air pollutants. The underground infrastructure is not expected to generate a significant source of operational activities. As mentioned above, the realignment would not add either new roadway capacity or new operational activities. Operational emissions from the proposed project are not expected to differ significantly from current operations and, therefore, are not further discussed in this air quality section.

Construction Emissions

Construction emissions will occur from the construction of the Culver Boulevard Realignment and Stormwater Capture components. Construction of the two components would overlap during the 2019 and 2020 calendar years. Construction activities include the following:

- Mobilization, clearing and grubbing, pavement removal and demolition;
- Excavation, trenching, rough grading and utility installation;
- Subgrade infrastructure and treatment system installation;
- Backfill, fine grading and paving; and
- Landscaping, electrical utilities and traffic signal installation.

Construction emissions originate primarily from the combustion of fossil fuels used by mobile on-road sources (e.g., workers vehicles, material and equipment delivery trucks, soil haul trucks) and mobile off-road sources (e.g., concrete industrial saws, excavators, off-highway trucks, backhoes, excavators and cement and mortar mixers). Construction equipment expected to be used for this project includes air compressors, cement and mortar mixers, concrete saws, cranes, excavators, off highway trucks, pavement breakers, pavers, rollers, rubber-tired dozers, skid steer loaders, sweepers/scrubbers, backhoes, trenchers, water trucks, concrete delivery trucks, and pumpers. Construction activities would occur during calendar years 2019, 2020, and 2021 with most emissions occurring in 2019 and 2020.

Air emissions resulting from construction activities of the proposed project were calculated based on a scenario where each equipment piece in each phase runs simultaneously. This approach assumes maximum daily operating time for all equipment assigned in each construction phase (e.g., Site Preparation, Grading, Construction, and Paving). Construction emissions were calculated using the California Emissions Estimator Model (CalEEMod). CalEEMod is widely accepted to provide a uniform platform to estimate potential emissions resulting from construction and operation activities of land use projects. The model uses pre-programed algorithms to calculate emissions based on data entered. The algorithms are designed to take information such as project size; construction length; vehicle and equipment types; number of vehicle trips and lengths; and equipment operating hours to calculate emissions of criteria pollutants and greenhouse gases. Emission calculations provided in this document factor dust control measures such as those prescribed in SCAQMD Rule 403 and off-road vehicles using on average Tier 3 engines.

CalEEMod input values and calculated air emission results for the proposed project are provided as Appendix C and summarized in Table 3-3.

Table 3-3 Project Construction Emissions of Criteria Pollutants (lb/day)

Project Phase	VOCs	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Construction (2019)	3.76	92.00	60.95	0.15	4.71	2.84
Construction (2020)	6.84	20.95	16.26	0.04	2.00	0.86
Construction (2021)	0.18	4.62	1.76	0.01	1.66	0.45
Threshold of Significance	75	100	150	150	150	55
LST	N/A	161	1480	N/A	N/A	7
Significant?	No	No	No	No	No	No

Notes:
CO carbon monoxide
lb/day pounds per day
LST localized significance threshold
N/A not applicable
NOx oxides of nitrogen (nitric oxide and nitrogen dioxide)
PM_{10} respirable particulate matter less than 10 microns in diameter
$PM_{2.5}$ respirable particulate matter less than 2.5 microns in diameter
SOx oxides of sulfur (sulfur dioxide and sulfur trioxide)
VOC volatile organic compounds

As identified in Table 3-3, construction impacts would be less than significant and in agreement with the assessment conducted in the Air Quality Section of the Draft PEIR for a distributed BMP Project, which is similar in size to the proposed project (Environmental Science Associates 2015). For the most part the footprint of the realignment component overlaps with the stormwater component except where Culver Boulevard intersects with Huron Avenue and Elenda Street. For the purpose of referencing the Draft PEIR, based on overlapping equipment use, the two components added together are similar to a distributed BMP Project as defined in the Draft PEIR.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts and the change in the environment which results from the incremental impact of the project when added to other closely related past, present, or reasonably foreseeable future projects and can result from individually minor, but collectively significant project taking place over a period of time" (SCAQMD 1993). The proposed project would result in cumulative impacts if it exceeds daily thresholds established by SCAQMD or if it incurred an increase of emissions beyond what is planned in the Culver city's General Plan.

Since emissions resulting from the operation of the proposed project would be minimal, daily thresholds would not be exceeded. Similarly, per the Draft PEIR, operation emissions of other program proposed projects would also be minimal and when added to the proposed project emissions, the total emissions would not exceed SCAQMD daily operational emissions thresholds and would have a less than significant impact on air quality (Environmental Science Associates 2015).

Construction emissions of the proposed project do not exceed the SCAQMD established daily thresholds. Additionally, the proposed project is consistent with Culver City's General Plan Goal to achieve "Ample and Efficient City Services and Infrastructure" where infrastructure includes streets and storm drains (Culver City 1995). Thus, since the proposed project does not exceed SCAQMD thresholds and it is consistent with the City of Culver General Plan, it would have a less than significant impact.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Localized Significance Thresholds (LST) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LST are applicable for projects that generate oxides of nitrogen (NOX), carbon monoxide (CO), respirable particulate matter less than 10 microns in diameter (PM10), and respirable particulate matter less than 2.5 microns in diameter (PM2.5). LST are based the following criteria: geographic location of the project, project site size, and proximity between the project site and the nearest sensitive receptor such as residences and schools (SCAQMD 2018).

Construction Thresholds

The SCAQMD has prepared LST guidance to help lead agencies assess localized air quality impacts from projects that are less than five acres and generate NOX, CO, PM10, and PM2.5. The methodology for analyzing localized air quality impacts from proposed projects is presented in the SCAQMD *Final Localized Significance Threshold Methodology* document (SCAQMD 2008). The methodology includes look-up tables with localized significance thresholds according to source receptor area for one, two and five acre proposed projects emitting CO, NOx, PM2.5, or PM10. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. Thus, only emissions generated by construction equipment and vehicles while at the site are used to evaluate LST. Construction emissions would have a localized impact if they exceeded LST.

Construction Analysis

The project Site is located within the City of Culver City. The nearest receptors to the project site are residential housing units to the north, south, east and west. The estimated proximity of the nearest housing unit to the project site is approximately 15 meters. The maximum area disturbed per day based on equipment use is 4.5 acres. Thus, LST were based on the 5-acre LST lookup table and compared against emissions calculated using CalEEMod. Based on the LST analysis, project construction emissions are below LST. LST and significance test are summarized in Table 3-3.

Toxic Air Contaminants

Toxic air contaminants (TACs) are substances that can cause cancer or other serious health effects. One route of exposure to TACs is through breathing contaminated air. Health risks associated with TACs are estimated by determining how hazardous a substance is and how much of this substance a receptor is exposed to. Sources of TACs include passenger cars, construction vehicles, manufacturing plants, and refineries.

The operation of the proposed project will not add any significant sources of toxic air contaminant, and therefore, would have a less than significant impact on sensitive receptors.

Emissions of TACs associated with the proposed project would be emitted primarily through the combustion of diesel fuel used by construction equipment during the construction of the project. These emissions are temporary and will stop once the construction phase is completed.

Emissions of TACs from mobile sources are regulated at the state level through the implementation of measures and programs including the pursuit of low-emission vehicle programs, low carbon fuel standards and heavy-duty vehicle emissions regulations. Applicable measures for the proposed project are the CARB's In-Use Off-Road Diesel Fueled Fleets Regulation and the In-Use On-Road Diesel-Fueled Vehicles. Both regulations are enforced by CARB and fleet owners (e.g., construction companies, equipment rental companies, brokers) are responsible for meeting compliance requirements. Tier 2 engines in off-road vehicles have been factored into the emissions calculations for this project as this group of engines is anticipated to be predominant in off-road vehicles at the time of construction. The SCAQMD has neither adopted nor recommended methodology for assessing health risk analysis associated with mobile sources at construction sites.

The Office of Environmental Health Hazard Assessment (OEHHA), in its Guidance Manual for Preparation of Health Risk Assessments associated with stationary sources, recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident in the Hot Spots Program and the 9 and 70- year cancer risk as supplemental information (OEHHA 2015). Since the Hot Spot Program is aim at stationary sources and long-term exposure and the proposed project would have neither stationary sources nor result in long term exposure to nearby residents, the proposed project is expected to have a less than significant impact on sensitive receptors.

e. Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact with Mitigation Incorporated. The proposed project would generate odors resulting from diesel combustion by on-road and off-road vehicles during the construction phase. Odors from construction sources would be significant if they were to become a nuisance pursuant to SCAQMD Rule 402. To become a nuisance odor resulting from the proposed project would need to generate multiple valid odor complaints. Since the construction of the proposed project requires operation of on-road and off-road vehicles, a continuous condition for odor emission is not anticipated and objectionable odors resulting from construction operation are anticipated to be less than significant impact.

Per the Draft PEIR odors may result from algal blooms in standing water associated with BMP developments (Environmental Science Associates 2015). This condition applies to the operation of the Stormwater Treatment element of the proposed project. To abate potential odors from the operation of the proposed project Stormwater Treatment element mitigation measure AES-2 and AIR-4 referenced in the Draft PEIR should be implemented.

Mitigation measures:

The following mitigation measures shall be implemented:

AES-2: Implementing agencies shall develop BMP maintenance plans that are approved concurrently with each structural BMP approval. The maintenance plans must include measures to ensure functionality of the structural BMPs for the life of the BMP. These plans may include general maintenance guidelines that apply to a number of smaller distributed BMPs."

AIR-4: During planning of structural BMPs, implementing agencies shall assess the potential for nuisance odors to affect a substantial number of people. BMPs that minimize odors shall be considered the priority when in close proximity to sensitive receptors."

3.4.4 BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Existing Conditions:

The project site consists of Culver Blvd., which is a multi-lane asphalt road that is separated into Culver Blvd, North and Culver Blvd. South by a landscaped median that includes bikeway/pedestrian facilities. The portions of the project site which are not paved have been landscaped using primarily non-native species. The project site is in an urbanized area, surrounded primarily by residential development on all sides.

A query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) was conducted to determine the known locations of any special-status species or habitats (sensitive, threatened,

endangered, rare, or candidate species) within and surrounding the project site and results are identified in Table 3-4 (CDFW 2018).

Table 3-4 Special-Status Wildlife Species with Potential to Occur

Common Name	Scientific Name	Federal Status / State Status	Other Status
Birds			
Swainson's hawk	*Buteo swainsoni*	- / ST	-
Belding's savannah sparrow	*Passerculus sandwichensis beldingi*	- / SE	-
Mammals			
Western yellow bat	*Lasiurus xanthinus*	- / -	SSC

Notes: Results based on CNDDB query for eight regional quadrangles.
ST = State Listed Threatened
SE = State Listed Endangered
SSC = CDFW Species of Special Concern

A general biological survey conducted on October 24, 2018 verified that the site is located within a developed urban environment and no native vegetation communities occur within the site. A total of 29 plant species, 3 native and 26 non-native, and 9 wildlife species, 8 native and 1 non-native were observed on site. Dominant plant species included non-native Washington fan palm (*Washingtonia robusta*), non-native pine (*Pinus canariensis*), native California sycamore (*Platanus racemosa*), and non-native acacia (*Acacia* sp.). Wildlife observed included species tolerant of urban environments and are as follows: non-native rock pigeon (*Columba livia*), native Anna's hummingbird (*Calypte anna*), native American crow (*Corvus brachyrhynchos*), native house finch (*Haemorhous mexicanus*), native northern mockingbird (*Mimus polyglottos*), native black phoebe (*Sayornis nigricans*), native monarch (*Danaus plexippus*), native sulphur butterfly (*Pieridae* sp.) and native marine blue (*Leptotes marina*).

Discussion:

a. Would the project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?

Less than Significant with Mitigation Incorporated. Culver City is located within southwestern Los Angeles County and is highly urbanized. Accordingly, the potential for candidate, sensitive, or special-status species or habitats is low within City limits. The project site is located along Culver Boulevard from Sepulveda Boulevard to Elenda Street and is currently maintained as a multi-lane thoroughfare with a landscaped median that includes bikeway/pedestrian facilities within the City right-of-way. A query of the CDFW CNDDB was conducted to determine the known locations of any special-status species or habitats (sensitive, threatened, endangered, rare, or candidate species) within and surrounding the project site (CDFW 2018). This included Culver City, located within the Beverly Hills quadrangle, and the seven adjacent quadrangles (Table 3-4). The wildlife species presented in Table 3-4 are those with any chance of potentially occurring within or adjacent to the project site based on regional occurrence and habitat present on site. Due to the urbanize/landscaped nature of the site and plant list established during the general biological survey, it was concluded that there is no potential for special-status plants to occur on site.

Due to the developed nature of the site, it is highly unlikely that any special-status species would occur within the project site. While the potential to support the species listed in Table 3-4 is very low, the project site includes trees and vegetation that could serve as potential habitat for nesting birds. The general biological survey was conducted outside of the bird nesting season, and while no inactive nests were observed within the project site, the project site includes numerous trees that could serve as potential habitat for nesting birds. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds if present. With implementation of mitigation measure BIO-1, project impacts to candidate, sensitive, or special status species would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 15 to September 15.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The CNDDB query identified seven habitat types within an eight quadrangle search around the project site:

- Southern Dune Scrub
- Riversidian Alluvial Fan Sage Scrub
- Southern Coastal Salt Marsh
- Southern Coast Live Oak Riparian Forest
- Southern Cottonwood Willow Riparian Forest
- Southern Sycamore Alder Riparian Woodland
- California Walnut Woodland

The project site consists of Culver Blvd., which is a multi-lane asphalt road that is separated into Culver Blvd, North and Culver Blvd. South by a landscaped median that includes bikeway/pedestrian facilities. None of the sensitive habitats listed above occur on site or within the proposed project vicinity. The proposed project would not impact habitat outside of the defined impact area. The portions of the project site which are not paved have been landscaped using primarily non-native species and were classified as ornamental landscaping during the general biological survey conducted on October 24, 2018. Therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community.

c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. During the general biological survey conducted on October 24, 2018, no wetlands were identified on the project site. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory identifies the nearest wetland waters occurring approximately 0.5 mile to the southeast of the project site at Ballona Creek, which is characterized as riverine waters (USFWS 2018). The proposed project would not impact any areas outside of the defined impact area; as such, no impacts to protected wetlands would occur.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated. The project site is in an urbanized area, surrounded primarily by residential development on all sides. The project site is not located within, or directly adjacent to, any known or mapped wildlife corridors or nursery sites. The landscaped median within the project site consists of

landscaping similar to that present in the surrounding urban area. Additionally, planned native landscaping would likely result in a net increase of vegetation suitable for wildlife movement. Vegetation currently on site may serve as potential nesting areas. However, with implementation of Mitigation Measure BIO-1, project impacts to the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird breeding season. The bird nesting season is defined as February 15 to September 15.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City of Culver City does not have any local policies or ordinances that protect specific biological resources, including protected tree policies. Additionally, the project site consists of a multi-lane asphalt road that is separated into Culver Blvd, North and Culver Blvd. South by a landscaped median that includes bikeway/pedestrian facilities, surrounded by urban uses. Trees present on site include non-native Washington fan palm (*Washingtonia robusta*), non-native pine (*Pinus canariensis*), non-native Jacaranda (*Jacaranda* sp.), non-native myrtle (*Lagerstroemia* sp.), and native California sycamore (*Platanus racemosa*). Project construction would require the removal/disturbance of trees in compliance with City requirements. Additionally, planned native landscaping would likely result in a net increase in native habitat. Therefore, the proposed project would not conflict with any local polices or ordinances protecting biological resources and no impacts would occur.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site is not included in any state, regional, or local habitat conservation plans and is not directly referenced within the conservation element of the General Plan (City of Culver City 1995). Therefore, no project impacts would occur.

Mitigation Measure:

The following mitigation measure shall be implemented:

BIO-1: A preconstruction nesting bird survey shall be conducted by a qualified biologist prior to tree removal, the use of heavy machinery, or significant ground disturbance if activities are to be conducted within the bird nesting season (February 15 – September 15). The survey shall be required within 72 hours prior to the commencement of construction activities if they occur in the bird nesting season. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No construction activities would be allowed within the buffer until the birds have fledged from the nest. Active nests and buffers would be monitored by a qualified biologist to determine if active nests are being adversely affected by project activities.

3.4.5 CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?		X		
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
d.	Disturb any human remains, including those interred outside of formal cemeteries?			X	

Existing Conditions:

The archaeological and paleontological archival research and pedestrian survey data presented in this section is based on the results of the *Archaeological and Paleontological Resources Phase I Assessment for the Culver Boulevard Realignment and Storm Water Infiltration/Retention Project – Culver Boulevard and Little Culver Boulevard, City of Culver City, Los Angeles County, California* (ArchaeoPaleo Resource Management, Inc. (APRMI) 2018). The archaeological and paleontological phase I assessment was prepared specifically for this proposed Project.

Discussion:

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Less than Significant with Mitigation Incorporated.

Section 15064.5(a) (3) of the CEQA Guidelines defines a “historical resource” as a resource that meets one or more of the following criteria:

- Listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR); or
- A resource listed in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code (PRC); or
- Identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC; or
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California that may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC, § 5024.1, Title 14 California Code of Regulation [CCR], Section 4852) including the following:

- An association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- An association with the lives of persons important to local, California, or national history.
- An embodiment of the distinctive characteristics of a type, period, region, or method of construction, or a representation of the work of a master, or possesses high artistic values.
- A resource that has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

A cultural resource assessment was conducted for the Project site and included a literature and record research and an intensive cultural resource pedestrian survey (APRMI 2018). On August 13, 2018, a literature and records search were conducted of the cultural resource site and Project file collection at the South Central Coastal Information Center (SCCIC), of the California Historical Resources Information System (APRMI 2018). As part of the record search, the SCCIC database of survey reports and overviews, documented cultural resources, cultural landscapes, and ethnic resources was consulted. Additionally, the search included a review of the following publications and lists: California Office of Historical Preservation (OHP) Historic Properties Directory/National Register of Historic Properties, OHP Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, the Los Angeles Historic-Cultural Monument, the City Declared List, and the California State Historic Resources Inventory (HRI) for Los Angeles County, and the California Register of Historical Resources (CRHR) to determine any local resources that have been previously evaluated for historic significance. Other resources such as ethnographic information, historical literature, historical maps, and by contacting the Culver City Historian and Historical Society Museum staff to request information on known local historic resources. The record search focused specifically on the Project sites and a 1-mile buffer around the Project site.

Based on the SCCIC results, six prehistoric resources and 13 historic built environment resources have been previously recorded within a one-mile radius of the Project. Prehistoric site types include five camp sites (include items such as lithic flakes and tools, ground or hand stones, shells, etc.) and one isolated Projectile point. The historic resources include 12 buildings (c. 1940s) and one historic feature (the Ballona Creek Flood Control Channel & Drainage System, c. 1935-1939). No previously recorded cultural resources were identified within the Project site.

On August 10, 2018, APRMI conducted a pedestrian field survey of the Project area to observe and record any cultural resources that may be present. Based on the field survey, the Project site is within a built environment and no natural or native ground surface was visible due to asphalt, concrete, buildings, and dense landscaped vegetation. No historic resources were observed within the Project site during the survey.

Several corbels/architectural features (decorative architectural remnants of a historic building) were observed within the Project site during the pedestrian survey. These corbels were once part of the frontage façade of the old Culver City Hall that was demolished in the 1980s (formally the City of Culver's Historical Site No. 1, located approximately 1-mile north of the Project). The corbels were placed on the bike path/walkway trail (the landscaped median along Culver Blvd) in 1996 to commemorate the original architecture of the 1928 City Hall. Per the Culver City Municipal Code Chapter 15.05.020, the corbels are recognized as having historical significance to the City as architectural relics of the former historic City Hall. To ensure the Project does not impact the architectural relics, the corbels will be removed prior to the start of the Project, located in a secure location during construction, and be relocated within the median once construction is completed.

The corbels/architectural relics are within the direct Project area of impact and are considered a significant resource to the City. Therefore, mitigation addressing the preservation and relocation of the corbels is included as Mitigation Measure CR-1. With incorporation of Mitigation Measure CR-1 below, Project impact would be less then significant.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant with Mitigation Incorporated. As noted above, a pedestrian field survey and SCCIC record search and literature search was conducted for the Project area. No previously recorded archaeological resources were identified within the Project site. The natural ground surface was not visible during the survey due to the built environment (paved roads, landscaping, etc.). While there are no known prehistoric resources that have been recovered within the direct area of potential Project impact, archaeological sites and isolated prehistoric artifacts have been recorded within a one-mile radius. Due to the proximity of these resources, and lack of preservation during early urban development, there is a possibility that subsurface archeological resources may still be present. In addition, sediments in the Project area consist of Quaternary (Holocene and Pleistocene) alluvium. Undisturbed, intact Holocene and late Pleistocene deposits are considered sensitive for archaeological material or deposits.

If construction ground disturbance depths range within native soils, there would be a potential to impact previously unrecorded subsurface archaeological resources. Mitigation for inadvertent discoveries of archaeological resources and archaeological monitoring is included as Mitigation Measure CR-1 below. With incorporation of Mitigation Measure CR-1, Project impact would be less then significant.

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated. On August 23, 2018, a paleontological record search was conducted by Dr. Samuel A. McLeod, Vertebrate Paleontology of the Natural History Museum of Los Angeles, and did not result in the identification of known vertebrate fossil localities within the Project area of potential impact(APRMI 2018) . However, several fossil localities were identified in nearby sedimentary deposits similar to those that occur in the Project area, specifically in older Quaternary alluvium. Localities LACM 3368 and 4250, northeast of the Project and around Ballona Creek sediments, have produced specimen fossils of Equus (horse) and Mammuthus (mammoth) at unknown shallow depths. Locality LACM 4232, just northeast of the Project area, have uncovered fossils of *Homo sapiens* at depth 12 to 13 feet below the surface. In addition, to the east-northeast of the Project there are multiple vertebrate localities recorded from the 1920's during excavations of the original Outfall Sewer system. Depths were not recorded for some localities but is noted that they were shallow at an unknown measurement. The localities include the following: LACM 1159, 3366, 3367, 3369, and 3370 with fossils of *Homo sapiens* at a depth of 19 to 23 feet., and Equus at 6 feet below the surface, *Mammut, Camelops*, and *Smilodon* (saber-tooth cat) were also uncovered, but at unknown depths.

On August 10, 2018, APRMI's qualified paleontologist conducted a paleontological survey within the Project area of potential impact. No paleontological resources were observed. Based on the field survey, the Project site is within a built environment and no natural or native ground surface was visible due to asphalt, concrete, buildings, and dense landscaped vegetation.

The sediments present in the direct area of potential Project impact consists of older Quaternary alluvium that has yielded significant vertebrate fossil remains at other locations nearby. While surficial sediment is unlikely to yield paleontological resources, fossiliferous sediment may be present at an unknown depth. The Project area is sensitive for paleontological resources and such resources may be encountered in native soils below fill grade. Therefore, mitigation addressing monitoring and inadvertent discoveries of paleontological resources has been included as Mitigation Measure CR-3 in case construction ground disturbance depths range within soils that potentially contain paleontological resources. With incorporation of Mitigation Measure CR-3 Project impact would be less than significant.

d. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. Results of the SCCIC records search and archaeological survey revealed there are no known burials within the Project area of potential impact.

Existing regulations require that if human remains and/or cultural items defined by the Health and Safety Code, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Los Angeles County Coroner would be contacted immediately. If the remains are found to be Native American as defined by Health and Safety Code, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours. The NAHC shall immediately notify the person it believes to be the Most Likely Descendant (MLD) as stipulated by California PRC, Section 5097.98. The MLD(s), with the permission of the landowner and/or authorized representative, shall inspect the site of the discovered remains and recommend treatment regarding the remains and any associated grave goods. The MLD shall complete their inspection and make their recommendations within 48 hours of notification by the NAHC. Any discovery of human remains would be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code. Therefore, with compliance with existing regulations, Project impact would be less than significant.

Mitigation Measures:

The following mitigation measures shall be implemented:

CR-1: **Corbel/Architectural Relics Removal and Relocation —** A qualified architectural historian (retained by the City) or qualified Project archaeologist (see CR-2) will be present during the removal and final relocation/placement of the corbel and architectural relics to ensure all information related to this activity will be documented for historic recordation (e.g. document, photograph, and map each corbel/architectural relics prior to removal, during removal, and after final relocation). The quailed architectural historian/Project archaeologist will coordinate with the City to develop a plan to ensure the corbels/architectural relics are properly documented, removed, stored, and relocated. This coordination will occur prior to the beginning of construction and removal of the corbels.

CR-2: Archaeological Monitoring Plan and Monitoring— A qualified archaeological monitor will be present on-site during ground disturbing activities that occur within native soils. An archaeological monitoring and inadvertent discovery plan that outlines protocols and procedures for monitoring and the discovery of cultural resources will be developed by the qualified Project Archaeologist (retained by the City). The plan will include monitoring procedures and inadvertent discovery procedures (e.g. halt work within a 100 radius of find, delineate and protect resource, notification protocols and contact information, assessment of such finds, reporting, etc.). The plan will be developed in coordination and consultation with interested tribes (see Tribal Resources). As part of this mitigation measure, prior to any ground disturbing activities within the Project site, all Project personnel will be briefed by the qualified archaeologist (about the duties of the archaeological monitor and the potential and procedures for the inadvertent discovery of prehistoric and historic archaeological resources). The training will include procedures for temporarily halting or redirecting work in the event of a discovery, identification and evaluation procedures, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will also be provided with a handout regarding identification of cultural resources, protocols for reporting finds, and contacts.

The qualified archaeologist will be retrained, and the archaeological monitoring and inadvertent discovery plan will be completed prior to any ground disturbing construction (including grading) of the Project site. As requested by interested Tribes, a Native American Monitor will also be present during construction ground disturbing activities (see Tribal Resources – TR-1).

CR-3: Paleontological Monitoring Plan and Monitoring — A qualified paleontological monitor will be present on-site during ground disturbing activities below the initial grade for potential fossil remains. Full time monitoring of the storm water infiltration and retention system excavation is required. A paleontological monitoring and inadvertent discovery plan that outlines paleontological protocols and procedures will be developed by the qualified Project Paleontologist (retained by the City). The monitoring plan will meet the standards of Society for Vertebrate Paleontology and will outline procedures for paleontological monitoring and inadvertent discovery of paleontological remains (e.g. halt work procedures, sampling, recordation, reporting, etc.). The qualified paleontologist will be retrained, and the paleontological monitoring plan will be completed prior to any ground disturbing construction (including grading) of the Project site.

3.4.6 GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
	ii.) Strong seismic ground shaking?			X	
	iii.) Seismic-related ground failure, including liquefaction?			X	
	iv.) Landslides?				X
b.	Result in substantial soil erosion or the loss of topsoil?			X	
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		X		
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

Existing Conditions:

The project site is within the Southwestern Block of the Los Angeles Basin of the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges Geomorphic Province is characterized by northwest-southeast trending elongated ranges hills and mountains separated by intervening valleys. The Peninsular Ranges extend southward to the tip of Baja California and are bounded on the north by the east west trending Transverse Ranges, on the east by the Colorado Desert, and on the west by the complex Continental Shelf of Southern California (Oakshott 1978; Norris and Webb 1990). The Southwestern Block of the Los Angeles Basin is the seaward part of the Los Angeles Basin and is bound by the Newport-Inglewood Fault Zone on the east, the Santa Monica Fault Zone and Santa Monica Mountains and the extends offshore to the west into the Pacific Ocean (Oakshott 1978). The Southwestern Block contains a deep structural basin up to 14,000 feet deep between the ranges of the

Newport-Inglewood Fault Zone on the east and the hill of the Palos Verdes Peninsula on the west, with Cretaceous age Catalina Schist forming the base. The basin has been filled with marine sediments dating from the Miocene to Pleistocene epochs, and alluvium eroded from the Transverse Ranges to the north (Oakshott 1978: Norris and Webb 1990).

The project site is located in the Ballona Gap, an antecedent stream gap created by the Los Angeles River and Ballona Creek that cuts through the Newport-Inglewood Fault Zone uplift, separating the Baldwin Hills on the south from the Chevoit Hills on the north. Historically, the Los Angeles River also flowed through the Ballona Gap prior to 1825 and again during the flood of 1867-68. The Site is underlain by Recent age alluvium composed of gravel and sand at the ground surface to a depth of approximately 50 feet bgs, that is underlain by older Upper Pliestocene age alluvium of the Ballona Aquifer to approximately 100 feet bgs, and Upper to Lower Pliestocene age alluvium of the Silverado Aquifer to approximately 200 feet bgs (California Department of Water Resources [DWR] 1961).

The project site is located in an area with a potential for strong ground motion during earthquakes. The project site area has been significantly impacted by numerous earthquake since the late 1700s, including the 6.4 moment magnitude 1933 Long Beach Earthquake. The Culver City Seismic Safety Element of the Revised General Plan (City of Culver City 1974) indicates that six significant earthquakes occurred in the project site area prior to 1933 and 37 earthquakes with a magnitude of at least 3.0 occurred between 1933 and 1974. The likelihood of the occurrence of more similar earthquake events within the next 50 to 100 years is not remote.

The Alquist-Priolo Fault Zoning Act of 1974 addresses surface fault rupture hazards to prevent the construction of buildings used for human occupancy across the surface traces of active faults (faults with documented Holocene activity in the last 11,000 years) and required that Earthquake Zones of Required Investigation (EZRIs) (formerly known as Alquist-Priolo Earthquake Fault Zones) be established around the traces of active faults (CGS 1973, revised 2018). The project site is not located within a mapped EZRI) (CDC, CGS 2018; City of Culver City 2007a) and there are no known active faults with the potential for surface rupture beneath or trending toward the Site. The closest EZRI for surface fault rupture is the Inglewood Fault of the Newport-Inglewood Fault Zone. The main branch of the Inglewood Fault of the Newport-Inglewood Fault Zone is located approximately 1.75 miles northeast of the project site and an EZRI on a sub-branch of the Inglewood Fault of the Newport-Inglewood Fault Zone approximately 0.25 miles long and 0.10 mile wide is located approximately 1.6 mile west of the project site. The fault identified nearest to the project site is the Overland Fault, approximately 0.3 mile to the northeast of the project site. The Charnock Fault is located approximately 1 mile south of the project Site. The Overland Fault and Charnock Fault are not considered to be active faults, with the most recent movement occurring in the late Pleistocene (Jennings, et al. 2010; CGS 2010). The active Santa Monica Fault Zone EZRI, is located approximately 3.25 miles to the north of the project site (CGS 2018).

The Seismic Hazards Act of 1990 address non-surface fault rupture earthquake hazards, including liquefaction. The project site is located in an area subject to ground failure from liquefaction (California Division of Mines and Geology [CDMG] 1998; CGS 2018; City of Culver City 2007b).

Groundwater occurs beneath the project site in the Recent alluvium to depths of approximately 50 feet bgs, in the alluvial and marine sediments of the Recent to Upper Pleistocene age Ballona Aquifer from approximately 50 to 100 feet bgs, and in the alluvial and marine sediments of the Lower Pleistocene age Silverado Aquifer from depths of 100 to 200 feet bgs (DWR 1961). The highest historical groundwater elevation in the project site area was recorded at approximately 13 feet below ground surface (bgs) (CDMG 1998). Groundwater levels have declined in the region over the last 100 years and the depth to groundwater measured in July and August of 2015 during the GI geotechnical investigation was 27.5 to 28 feet bgs in boring B-1, 50 feet bgs in boring B-2, and 49.5 feet bgs in boring B-3 (Geotechnologies, Inc. [GI] 2015). The Preliminary Geotechnical Engineering Investigation is included as Appendix D and the Geotechnical Report Addendum No. 1 as Appendix E.

Discussion:

a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

I. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The project site is not within a mapped EZRI (CDC, CGS 2018; City of Culver City 2007a). The closest EZRI for surface fault rupture is the Inglewood Fault of the Newport-Inglewood Fault Zone, located approximately 1.75 miles northeast of the project site. No impact is anticipated.

II. Strong seismic ground shaking?

Less than Significant Impact. The Southern California region is known to be seismically active. The project area is located in the general proximity of several active and potentially active faults. Active faults are defined as those that have experienced surface displacement within the Holocene period (approximately the last 11,000 years. The project site is located approximately within 1.75 miles of the active Inglewood Fault Newport - Inglewood Fault Zone and is located in an area that has a number of other active faults. An earthquake on any fault in the vicinity of the project would subject it to seismic ground shaking. The proposed project is not a habitable structure, so a less than significant impact would occur as a result of strong seismic ground shaking. The 2015 geotechnical study of the project site (GI 2015) indicated that the horizontal peak ground acceleration (PGA) that corresponds to the Risk Targeted Maximum Considered Earthquake (MCE_R) for the Site was calculated at 0.69g using the United States Geological Survey (USGS) website (USGS 2013) and used it to perform a site-specific liquefaction analysis of the project site. The site-specific liquefaction analysis of the project site indicated that site soils would not be prone to liquefaction during the ground motion expected during the design-based seismic event. The GI report provided recommendations for foundation design in accordance with industry standards. The project would be constructed in accordance with the 2016 California Building Code and the City of Culver City's Municipal Building Code. Therefore, the impact of strong seismic ground shaking at the project site is less than significant.

III. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. The project site is located in an area subject to ground failure from liquefaction (CDMG 1998; CDC, CGS 2018; City of Culver City 2007b). Based on the site-specific liquefaction analysis that was performed for the geotechnical investigation conducted for the site by GI in 2015, the project site soils would not be prone to liquefaction during the ground motion expected during the design-based seismic event with a high groundwater table at approximately 13 feet bgs, the highest historic groundwater level for the project site area (CDMG 1998; GI 2015). Groundwater levels have declined in the region over the last 100 years and depth to groundwater was measured in July and August of 2015 during the GI geotechnical investigation was 27.5 to 28 feet bgs in boring B-1, 50 feet bgs in boring B-2, and 49.5 feet bgs in boring B-3. The project would be constructed in accordance with the 2016 California Building Code and the City of Culver City's Municipal Building Code. Therefore, it is not likely that liquefaction would occur at the project site and the impact is less than significant.

IV. Landslides?

No Impact. The project site is not in an area subject to landslide ground failure (CDMG 1998; City of Culver City 2007b). No project impact would occur.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The proposed project includes water quality infrastructure improvements. During construction, a Stormwater Pollution Prevention Plan (SWPPP) is required for construction sites over an acre that would identify BMPs to manage soil erosion from wind and stormwater. Upon completion of project construction activities, the site would be restored. Therefore, a less than significant impact is anticipated.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. The project site is not in an area subject to landslide ground failure (CDMG 1998; City of Culver City 2007b). The project site is located in an area subject to ground failure from liquefaction (California Division of Mines and Geology [CDMG] 1998; CGS 2018; City of Culver City 2007b). However, based on the site-specific liquefaction analysis that was performed for the geotechnical investigation conducted for the project site by GI in 2015, the project site soils would not be prone to liquefaction during the ground motion expected during the design-based seismic event with a high groundwater table at approximately 13 feet below ground surface (bgs), the highest historic groundwater level for the project site area (CDMG 1998; GI 2015). The project would be constructed in accordance with the 2016 California Building Code and the City of Culver City's Municipal Building Code. Therefore, the project impact is less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact with Mitigation Incorporated. Expansion index (EI) testing by method ASTM D4829 was performed on soil samples collected from depths of 1 to 5 feet bgs in borings B3, B6, and B9 in accordance with Table 18-1-B of the 1994 Uniform Building Code (GI 2015). EI potentials are rated as very low for 0 – 20, low for 21 – 50, moderate for 51 – 90, high for 91 – 130, and very high for greater than 130. The EI test result in the sample from boring B3 (86) was moderately expansive and the EI test results in the samples from borings B6 (98) and B9 (104) were highly expansive. Specific mitigation measures for the expansive soils at the project site were not presented in the 2015 GI report. With the implementation of the site-specific mitigation measures for the expansive soils in GEO-1, the project impact would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would not use septic tanks or alternative wastewater disposal systems and no project impact would result.

Mitigation Measures:

GEO 1: Mitigation measures for the expansive soils identified at the project site in the 2015 GI report shall be developed in accordance with the 2016 California Building Code and the City of Culver City Municipal Code.

3.4.7 GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b.	Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Existing Conditions:

Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere, which in turn heats the surface of the earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes while others are anthropogenic (i.e., created and emitted solely through human activities).

Per the California Health and Safety Code 38505, regulated GHGs consist of carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen triflouride (NF_3). GHGs are commonly quantified in the equivalent mass of CO_2, denoted CO_2e, which takes into account the global warming potential of each individual GHG compound.

Carbon dioxide enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and wood products, and as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle. Methane is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills. Nitrous oxide is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste. Hydrofluorocarbons, PFCs, SF_6, and NF_3 are synthetic, powerful greenhouse gases that are emitted from a variety of industrial processes. These gases are typically emitted in smaller quantities, but because they are potent greenhouse gases, they are sometimes referred to as High Global Warming Potential gases ("High GWP gases"). HFCs and PFCs are sometimes used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). SF6 is employed in electricity transmission and distribution and semiconductor manufacturing. NF_3 results from semiconductor manufacturing processes (CARB 2017).

The Governor's Office of Planning and Research (OPR) in cooperation with the Resources Agency, the California Environmental Protection Agency (Cal/EPA), and the ARB developed the *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review Technical Advisory* in an effort to facilitate an informal guidance regarding the steps lead agencies should take to address climate change in their CEQA documents (OPR 2008). The general approach presented in the OPR's Technical Advisory (i.e., determining GHG emissions, identifying significance, and mitigating impacts) is employed in the following sections.

On December 5, 2008, pursuant to state law (i.e., CEQA Guidelines 15064.7) the SCAQMD Governing Board adopted a proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The

significance threshold is applicable for stationary sources and can be used for determining significant impacts for proposed projects (SCAQMD 2008). Under the interim significance thresholds projects can emit up to 10,000 metric tons (MT) per year of CO2eq before being deemed as having significant air quality impacts. Also, the SCAQMD has proposed but not adopted a screening threshold of 3,000 MT per year CO2e for residential and commercial developments, including industrial parks, warehouses, etc. The 3,000 MT per year CO2e threshold suggested in the PEIR is used for the proposed project as a screening reference only. GHG thresholds are not established for temporary sources. There are no other federally, statewide, or regionally established significance thresholds to support impact assessments of GHG emissions from proposed projects. Instead, the state has pursued other initiatives to meet GHG reduction goals. Some of those initiatives include the pursuit of low-emission vehicle programs, low carbon fuel standards, heavy-duty vehicle GHG regulations, and renewable energy technologies (e.g. wind and solar power).

Discussion:

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Greenhouse gas emissions would result primarily during the construction of the proposed project. GHG emissions resulting from the operation of the proposed project are deemed insignificant, and are, therefore, not further discussed. GHG emissions from the construction activities of the proposed project were calculated using CalEEmod. CalEEMod output results are included in Appendix C. The total calculated GHG emissions resulting from the construction activities, significant thresholds, and assessment of significance are summarized in Table 3-5. Detailed CalEEMod input values and calculated GHG results are included as Appendix C. As presented in Table 3-5, GHG emissions from construction activities do not exceed either the annual or amortized emissions and therefore represent a less than significant impact.

Table 3-5 Project GHG Construction Emissions

Calendar Year	Annual MT CO_2e
2019	767
2020	207
2021	4
Total	978
Emissions Amortized over a 30-Year Period	33
Threshold of Significance	3,000
Significant?	No

Notes: GHG greenhouse gas
MT CO_2e metric tons of carbon dioxide equivalent

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. GHG emissions would conflict with applicable plans, policy or regulation if the proposed project conflicts with any of the plans, policies or regulations adopted for the purpose of reducing GHG emissions in the Los Angeles County.

The City of Culver City does not have a specific greenhouse plan element in its general plan, but it has strategies aimed at reducing GHGs. Since the proposed project does not add long term emissions of GHG and its land use would not change, it is not anticipated to interfere with Culver City GHG policies. Additionally, the project is

budgeted in the SCAG 2016-2040 RTP/SCS and the 2017 FTIP under Project ID LAF3175. The FTIP reflects how implementation of the RTP/SCS and reducing of GHGs is achieved. The RTP/SCS incorporates a requirement for the region to meet its greenhouse gas (GHG) reduction targets as set forth by the CARB. Since the proposed project is budgeted within the RTP/SCS it is in agreement with the GHG reduction goals set forth in the RTP/SCS. Therefore, project impact would be less than significant.

Mitigation Measures:

No mitigation measures are required.

3.4.8 HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e.	For a project located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h.	Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

Existing Conditions:

Based on information reviewed, 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.

Discussion:

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A hazardous material is defined as any material that due to its quantity, concentration, physical or chemical characteristics, poses a significant present or potential hazard to human health or to the environment if released. Hazardous materials include, but are not limited to, inorganic and organic chemicals, solvents, mercury, lead, asbestos, paints, cleansers, or pesticides.

Construction activities associated with the proposed project would include the use of hazardous materials, including petroleum-based products, solvents, paints, and sealers. However, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration (OSHA) requirements, the Federal Resource Conservation and Recovery Act (RCRA), Title 8 and 22 of the Code of California Regulations, and the City's Municipal Code, which states that it is a violation to release hazardous materials in an unauthorized manner (Section 9.02.305) (City of Culver City, 2018). Operation of the project would not involve in the routine transport, use, or disposal of hazardous materials. Therefore, a less than significant impact would result.

b. Would the project create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?

Less Than Significant Impact. During construction, hazardous materials may be used, including petroleum-based products, solvents, paints, and sealers; however, it is assumed that potentially hazardous materials would be contained, stored, used, transported, and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, as discussed in Response a. With adherence to existing regulations, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials in to the environment. Therefore, a less than significant impact would result.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Culver City High School is located approximately 0.24 mile southeast of the project site. Construction activities associated with the proposed project would require the use of hazardous materials and substances within the project area, such as road sealant and paint, however the construction activities would not be conducted on school property. It is assumed that potentially hazardous materials would be contained, stored, used, transported, and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, as discussed in Response a. The use of these materials during construction are not expected to impact the school, however Culver City high school is less than 0.25 mile from the project area. Operation of the project would not result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, a less than significant impact would result.

d. Would the project be 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 it create a significant hazard to the public or the environment?

No Impact. 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 (California Environmental Protection Agency, 2018); therefore, no project impact would result.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no public airport or public use airports located within 2 miles of the proposed project site. The nearest airport is Santa Monica Municipal Airport, approximately 2.4 miles northwest of the project site; therefore, there would be no impact.

f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The nearest private airstrips are three heliports, approximately three miles southwest of the project site, and the project area is not near a private airstrip. Therefore, there would be no impact.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The project is not anticipated to interfere with an emergency response or evacuation during long-term project operations, and coordination with the City's emergency service providers would be conducted prior to construction commencement. Therefore, no project impact would result.

h. Would the project expose people or structures to the risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Wildlands are considered undisturbed areas where vegetation and wildlife remain in their natural state. The project site and areas immediately surrounding the project site are urbanized, and no increased wildland fire hazard is expected as a result of project construction or operation. Therefore, there would be no impact.

Mitigation Measures:

No mitigation measures are required.

3.4.9 HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Violate any water quality standards or waste discharge requirements?			X	
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
f.	Otherwise substantially degrade water quality?			X	
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h.	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?				X
i.	Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j.	Contribute to inundation by seiche, tsunami, or mudflow?			X	

Existing Conditions:

The project site is located in the Ballona Creek Watershed, tributary to Reach 2 of Ballona Creek. The Ballona Creek Watershed is characterized by mostly residential (65%), some open space (17%) and smaller areas of commercial and industrial land use (8% and 4% respectively). Ballona Creek Reach 2 is mostly channelized with trapezoidal walls and conveys controlled non-storm and storm flows from the Los Angeles basin to Santa Monica Bay. Ballona Creek is bound by the Santa Monica Mountains on the north, the Harbor Freeway (110) on the east, and the Baldwin Hills on the south. Ballona Creek flows 8.8 miles west until its confluence with the Pacific Ocean. Major tributaries to Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains entering from the seven cities and unincorporated County area that Ballona Creek passes through. The waterbody associated with Reach 2 is Sepulveda Channel.

The project site is located in a Federal Emergency Management Agency (FEMA) flood Zone X, where the probability of flooding inundation has been evaluated to be 0.2 percent (i.e. a 500-year event, FEMA 2008).

Discussion:

a. Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. There are no water bodies within the project area; however, the project area drains into Ballona Creek, an 8.8-mile-long waterway in southwestern Los Angeles County that flows to the Santa Monica Bay. Ballona Creek is located approximately 0.5 mile southeast of the project area and runs in a northeast to southwest direction through the city.

The City is a co-permittee under the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4 (Municipal NPDES Permit), issued by the California Regional Water Quality Control Board, Los Angeles Region (Order No. R4-2012-0175 and NPDES No. CAS004001), as last amended on November 8, 2012 (California Regional Water Quality Control Board, Los Angeles Region, 2012). The Municipal NPDES Permit includes water quality standards, called Total Maximum Daily Loads (TMDL), for specific water bodies. Water quality standards applicable to Ballona Creek include the Ballona Creek Trash TMDL; the Ballona Creek Metals TMDL; the Ballona Creek Estuary Toxic Pollutants TMDL; and the Ballona Creek, Ballona Estuary, and Sepulveda Channel Bacteria TMDL (California Regional Water Quality Control Board, Los Angeles Region, 2011).

To comply with the Municipal NPDES Permit, the City adopted a Storm Water Ordinance (Chapter 5.05, Stormwater and Stormwater Treatment Pollution Control, of the City's Municipal Code) (City of Culver City, n.d.). In addition, construction projects in the city must be conducted in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) issued by the SWRCB (Order 2009-0009-DWQ, NPDES No. CAS000002) on September 2, 2009 (State Water Resources Control Board, 2009). To comply with the Construction General Permit, all construction projects require implementation of minimum storm water protection requirements, and preparation of a Storm Water Pollution Prevention Plan (SWPPP) that covers construction materials and waste management control (City of Culver City, 2015). For projects that are greater than one acre, a General Construction Activities Stormwater Permit and Waste Discharge Identification (WDID) number must be obtained from the SWRCB by filing a Notice of Intent (NOI) and certifying that a state SWPPP has been prepared.

The project would include the construction of an underground retention basin and infiltration system, which would include precast concrete structures and two stormwater harvesting structures for further treatment prior to spray irrigation reuse. The structure would connect to the surrounding storm drain network that flows into Ballona Creek and is intended to serve as a stormwater treatment BMP that would allow for a treatment volume of 8.0 acre-feet of runoff. The project would treat stormwater runoff before it drains into Ballona Creek and would not result in exceedances of any of the TMDLs for Ballona Creek. Therefore, operation of the project would comply with the Municipal NPDES Permit and would not violate any water quality standards or waste discharge requirements. The

project would divert and reduce the amount of pollutants conveyed within the local storm drain (8.9 lbs. of the critical storm zinc loading reduced and 31.9% runoff reduction of the critical storm) that would improve quality of water conveyed downstream of this project. Therefore, project impact would be less than significant.

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. The City's water supply is provided by imported water from the Colorado River Aqueduct and the State Water Project (imported and distributed by Metropolitan Water District of Southern California) (Golden State Water Company, 2012). No groundwater supplies are used in the project area or would be affected by the project; therefore, there would be no impact.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. There are no water bodies within the project area. However, the project area drains into Ballona Creek, approximately 0.5 mile southeast of the project area. The project includes the construction of an underground retention basin and infiltration system, which would include a precast concrete reservoir and stormwater harvesting structure. The structure would connect to the surrounding storm drain network that flows into Ballona Creek and is intended to serve as a stormwater treatment BMP that would allow for a treatment volume of 8.0 acre-feet of runoff. The project would be designed to accommodate and treat stormwater runoff within and surrounding the project area. The project would not alter the existing drainage pattern or alter the course of an existing stream or river. Hydraulic calculations have been performed to support that there would be no impact on the existing drainage systems being diverted on Sepulveda Boulevard and Harter Avenue. Infrastructure inverts, sizing, and design flows were developed from L.A. County Department of Public Works As-Built drawings and input to WSPG (Water Surface Pressure Gradient, software approved by L.A. County for this type of analysis) with project-specific changes at the points of diversion to verify there are no negative impact to the existing drainage systems. Resultant flows do not disturb the water surface elevation except to diminish it after the point of diversion. Therefore, project impact would be less than significant.

d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. There are no water bodies within the project area. However, the project area drains into Ballona Creek, approximately 0.5 mile southeast of the project area. The project would include an underground retention basin and filtration system, which would be designed to accommodate stormwater runoff within and surrounding the project area. The project would not increase the amount of runoff, but would help to reduce runoff through capturing 31.9% of the critical storm runoff volume and 38.4% of the average annual runoff volume overall. Project construction would require grading activities, but drainage patterns would not be substantially altered in a manner that would result in flooding on- or off-site. Therefore, project impact would be less than significant.

e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in Responses a), c), and d), the project would be designed to accommodate and treat storm water runoff during operation. Operation of the stormwater vault involves diversion of water from the existing stormwater drainage infrastructure for capture and treatment at the vault. The net result

is either a decrease or no net change to existing runoff in all operational conditions. Therefore, project impact would be less than significant.

f. Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Responses a), c), and d), the project would be designed to minimize potential water quality impacts during operation. The project would divert and reduce the amount of pollutants conveyed within the local storm drain (average annual zinc load reduction of 26.8% where zinc load is a limiting criteria that indicates similar to greater reductions of other pollutants of concern) that would improve quality of water conveyed downstream of this project. The proposed project would be subject to the Los Angeles County Flood Control District NPDES permit conditions for discharges into the storm drain system. Impacts to water quality are expected to be less than significant.

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1595F, the project area is in Zone X, which is defined as an area that is outside the 0.2-percent annual chance floodplain (Federal Emergency Management Agency, 2008). The project area is not within a 100-year flood hazard area, and the project would not include the construction of housing. Therefore, no project impact would result.

h. Would the project place within a 100-year floodplain structures that would impede or redirect flood flows?

No Impact. As discussed in Response g), the project area is not within a 100-year flood hazard area. The project would include adding streetlights in the project area, but no other vertical structures would be constructed as part of the project. Therefore, no project impact would result.

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than Significant Impact. Dam inundation is flooding that occurs due to structural failure of a dam. Failure of a dam may be caused by seismic activity, severe flooding that causes water to exceed the capacity of the dam, or landslides that flow into a reservoir displacing water. The project site is within the inundation zone of the Stone Canyon Reservoir (City of Culver City 2007b). The proposed project is infrastructure improvements that would not house people or otherwise increase the risk of exposure to risks related to potential flooding. Therefore, project impact is anticipated to be less than significant.

j. Would the project contribute to inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A tsunami is a long, high sea wave caused by an earthquake or other disturbance. According to the City's Tsunami Map, the project area is in a tsunami risk zone (City of Culver City, 2010). However, the project would include improvements along an existing roadway, and would not result in any changes to the existing potential for inundation by tsunami. A mudflow occurs when mud travels down a slope very quickly. The project area is relatively flat with mostly paved surfaces; therefore, the area is not considered susceptible to mudflows. A seiche is a temporary disturbance or oscillation in the water level of a lake or partially enclosed body of water. The project area is not susceptible to seiches because the area is surrounded by residential and commercial development, and there are no lakes or partially enclosed bodies of water within or adjacent to the project area. Therefore, project impact is anticipated to be less than significant.

Mitigation Measure:

No mitigation measures are required.

3.4.10 LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Physically divide an established community?				X
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Existing Conditions:

The project site has a General Plan land use designation of open space. The open space designation is established to protect Culver City's open space resources that include public and private land. It is designed and intended to preserve existing and future parks, open space and recreation opportunities.

The project site is zoned for transportation (T). Permitted uses within the T zone include the operation and maintenance of any transportation business, including private rights-of-way, easements, railroads, railways, pipe lines, pole lines, conduits, bus lines, or airports. Such area shall be used exclusively for such transportation business and appurtenant facilities, including passenger stations, electrical substations, and the beautification and protection of such rights-of-way. In addition, automobile parking areas are permitted, and telecommunication facilities may be permitted with an Administrative Use Permit or a Conditional Use Permit.

Discussion:

a. Would the project physically divide an established community?

No Impact. The proposed project would include realignment of an existing roadway including an improved median and bike path that is intended to continue to promote connectivity between the communities north and south of Culver Boulevard. Therefore, the proposed project would not physically divide an existing community and no project impact would result.

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The project site is zoned for transportation (T). The project site is an existing roadway and would continue to be utilized as such with implementation of the proposed project. In addition, the project is listed in the Southern California Association of Governments (SCAG) 2012-20135 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the proposed project would not conflict with applicable land use policies and project impact would be less than significant.

c. Would the project conflict with any applicable habitat conservation plan or natural communities conservation plan?

No Impact. The project site is not included in any state, regional, or local habitat conservation plans and is not directly referenced within the conservation element of the General Plan (City of Culver City 1995). Therefore, no project impacts would occur.

Mitigation Measures:

No mitigation measures are required.

3.4.11 MINERAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X

Existing Conditions:

Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans. The Culver City General Plan does not identify any known mineral resource areas (City of Culver City 1995).

According to the California Department of Conservation, there are no areas where there are, or there is likely to be, mineral deposits within the project site (ICF International 2012).

Discussion:

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The State Mining and Geology Board designates Mineral Resource Zones (MRZ) and areas in which minerals have been found in substantial quantities. MRZ-2 areas are defined as areas where there are, or there is likely to be, mineral deposits. There are no MRZ-2 areas or oil fields within or adjacent to the project site (ICF International 2012). Therefore, no impacts on minerals would result.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. There are no mineral resource recovery sites in the project area according to the City's General Plan (City of Culver City 1995). Therefore, no impacts on minerals would result.

Mitigation Measures:

No mitigation measures are required.

3.4.12 NOISE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		X		
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

Existing Conditions:

The existing noise environment consists of vehicle noise from local street traffic on Culver Boulevard, Sepulveda Boulevard, Harter Avenue, Elenda Street, and Interstate 405 (I-405) as well as nature sounds and community sounds. Adjacent land uses include residential single-family homes located along Culver Boulevard. No ambient noise monitoring data have been identified for the project vicinity, but existing land use patterns and noise contours published by the City of Culver City indicates that the existing ambient noise levels at the proposed project site should range from 60 dBA CNEL near the intersection of Culver Boulevard and Elenda Street to 65 dBA CNEL near the intersection of Culver Boulevard and Sepulveda Boulevard.

Discussion:

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. Culver City's Noise Element to the General Plan identifies the land use compatibility standard for noise-sensitive land uses as a CNEL of 65 dBA CNEL. No ambient noise monitoring data have been

identified for the project vicinity. However, Culver City's Noise Element indicates that the existing ambient noise levels should range from 60 dBA CNEL to 65 dBA CNEL in the vicinity of the project area based on existing land use patterns and published noise contours. The project construction would have only a minimal impact on daily traffic volumes in the project vicinity, and thus would have minimal impact on traffic noise conditions.

Culver City's Municipal Code Chapter 9.07 has established noise regulations to prohibit unnecessary or any noise disturbance. This ordinance specifically identifies animals, nonemergency signal devices, domestic power tools, music, and amplified sounds. This ordinance does not establish noise threshold limits. However, the Culver City Noise Element has established a threshold of 65 dBA CNEL to noise sensitive receptors. The project proposed a low horse power pump that would be located within an enclosure and would generate noise level well below the 65 dBA CNEL requirement. Therefore, noise levels from the operations of the project are considered to be less than significant.

The Culver City's Code Municipal Code Chapter 9.07 exempts construction equipment operating between the daytime hours of 8:00 a.m. to 8:00 p.m. Monday through Friday, 9 a.m. to 7:00 p.m. on Saturdays, and 10:00 a.m. to 7:00 p.m. on Sundays. The construction of the proposed Project would be conducted during weekdays between the hours of 8:00 a.m. to 8:00 p.m. No nighttime or weekend work is expected. Therefore, the noise impacts generated by the construction of the Project will comply with Culver City's noise regulations, therefore, considered to be a less than significant impact.

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Operation of the pump being installed as part of the stormwater capture component would not generate vibration; However, construction at each site would require the use of equipment that could generate vibration. Possible sources of vibration may include excavators, flatbed trucks, backhoes, and other construction equipment that produces vibration. No blasting will be required at the project site.

Project construction activities at each of the sites could occur within approximately 50 feet from single family residences. According to the Federal Transit Administration (FTA) guidelines, a vibration level of 65 VdB is the threshold of perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events (Federal Transit Administration 1995). Based on the levels published by the FTA (Federal Transit Administration 2006) and the type of equipment proposed for use at the proposed Project, coupled with the distance to the existing identified noise sensitive receptors, analysis shows that all identified sensitive receptors would be below the maximum vibration level of 80 VdB. This vibration level is considered acceptable for impacts to residential homes. Therefore, project impact would be a less than significant.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. The dominant noise sources in the vicinity of the proposed project site is traffic noise associated with Culver Boulevard, Sepulveda Boulevard, Harter Avenue, Elenda Street, and I-405. Based on existing traffic volumes, noise impacts to adjacent residences range from 60 dBA CNEL to 65 dBA CNEL. The operation of the Project would generate periodical maintenance that would result in a minimal increase in traffic noise levels resulting in an overall increase of less than one dBA. An increase in the ambient noise levels of three dBA or greater is considered significant. Since the proposed Project is shown to only increase the overall ambient community noise level by less than one dBA, it is considered to be a less than significant impact.

The stormwater treatment component of the proposed project has a pump station that includes a single pump. This pump is expected to be a low horsepower pump. Given the size of the pump and that it will be enclosed within a pump house enclosure the noise levels generated from the proposed Project will be well below the existing traffic noise and will result in a less than one dBA increase to the existing noise level. Since the proposed Project is shown to only increase the overall ambient community noise level by less than one dBA, it is considered to be a less than significant impact.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation Incorporated. Construction of the proposed project would occur in two phases. The first will be the realignment component, which is planned to begin the in April of 2019 and last approximately 18 months. The second phase is the stormwater capture component, which is planned to begin in June of 2019 and last approximately 14 months. The construction of each component will occur concurrently after June of 2019. The realignment component will be completed in specific construction phases including:

- Mobilization/clearing and grubbing/demolition;
- Excavation/utility installation;
- Fine grading/paving; and
- Landscaping/electrical/traffic signals.

The stormwater capture component will be completed in specific construction phases including:

- Mobilization/clearing and grubbing/demolition;
- Excavation/trenching/rough grading;
- Subgrade/utility installation/treatment system; and
- Backfill/fine grading/electrical and controls.

Both project components would require a variety of equipment. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet.

The highest noise levels during construction are normally generated during the use of demolition or earth moving equipment. The mobilization/clearing and grubbing/demolition would incorporate the loudest equipment used at the site during the stormwater capture component. This equipment is expected to generate a maximum instantaneous noise level (L_{max}) ranging from 84 to 90 dBA at single family homes located at a distance of 50 feet. The Excavation/trenching/rough grading construction of the realignment component would result in noise levels ranging from 80 to 90 dBA L_{max} at a distance of 50 feet. The noise levels from the construction of both components would be loud enough to temporarily interfere with speech communication outdoors and indoors with the windows open. Project construction would occur between the hours of 8:00 a.m. and 8:00 p.m., Monday through Friday. Due to the infrequent nature of loud construction activities at the site, the limited hours of construction, and the implementation of Mitigation Measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact.

The construction of the proposed facility will generate maximum trips during the excavation phase of each component, which incorporates 60 daily trips combined. The construction route is expected to enter the site from Culver Boulevard from I-405. Noise level increases as a result of project construction traffic near residential developments will result in a less than 2 dBA increase along Culver Boulevard and a less than 1 dB increase once the project traffic travels on I-405. The noise impacts from the Project construction traffic will result in a less than significant impact.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. Based on a review of maps and aerial photos for the project region, no public airport or public use airport is located within 2 miles of the proposed project site. The nearest airport is Santa Monica Municipal Airport located approximately 2.4 miles northwest from the project site. Therefore, no project impact would result.

f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. Based on a review of maps and aerial photos for the project region, there are no private airstrips close enough to generate a significant noise impact at the proposed project site. The nearest airport is Santa Monica Municipal Airport located approximately 2.4 miles northwest from the project site. Therefore, no project impact would result.

Mitigation Measure:

The following mitigation measure shall be implemented:

N-1: The project applicant shall require construction contractors to limit standard construction activities as follows:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible).
- Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.
- If needed impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather that impact equipment whenever feasible.
- Electrically-powered equipment will be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.

3.4.13 POPULATION AND HOUSING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

Existing Conditions:

The proposed project is located in Culver City that has a residential population of approximately 40,000.

Discussion:

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. No new homes or businesses are being proposed as part of this project that could directly or indirectly result in population growth. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. However, these improvements would occur within the existing City right-of-way and the proposed realignment would not increase roadway capacity.

The construction of the proposed project would require construction workers. However, due to the relatively small size of the project and short duration of project construction activities, the proposed project is not anticipated to induce employees to move to the project vicinity and induce population growth or the need for new housing. During long-term project operations, workers would be needed for routine maintenance activities. However, the proposed project would not generate a substantial number of new jobs. Therefore, project impact would be less than significant.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project is located within City right-of-way. No existing housing would be removed. Therefore, there would be no need for the construction of replacement housing elsewhere and no project impact would result.

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project is located within City right-of-way and no people would be displaced as a result of the proposed project; therefore, no project impact would result.

Mitigation Measures:

No mitigation measures are required.

3.4.14 PUBLIC SERVICES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
	i.) Fire protection?			X	
	ii.) Police protection?			X	
	iii.) Schools?			X	
	iv.) Parks?			X	
	v.) Other public facilities?			X	

Existing Conditions:

Fire Protection Services

The Culver City Fire Department provides fire protection services to Culver City, and currently consists of 72 members, three stations, and three other service facilities. Station No. 1 serves as the headquarters station and is located at 9600 Culver Blvd. Culver City Fire Department personnel provided services of fire suppression, paramedic advanced life support, community risk reduction, and educational programs (City of Culver City 2018).

Police Protection Services

The Culver City Police Department provides police protection services to Culver City, and consists of 109 sworn officers, 14 reserve officers, and 42 professional staff. (Culver City Police Department 2018).

Public Education

The Culver City Unified School District consists of four elementary schools, one middle school, two high schools, and four other educational facilities (Culver City Unified School District 2018).

Parks

There are thirteen public parks within the City of Culver City, offering a variety of recreational facilities including sports fields, barbeques, picnic areas, playgrounds, etc. (City of Culver City 2018, Google Maps 2018).

Discussion:

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

I. Fire Protection

Less Than Significant Impact. The Culver City Fire Department provides fire protection services to Culver City and consists of three stations within the City: Station No. 1 (headquarters) located at 9600 Culver Blvd., Station No. 2 located at 11252 Washington Blvd., and Station No. 3 located at 6030 Bristol Pkwy. (City of Culver City 2018). Station No. 2 is nearest to the project site.

The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. There would be no increase in roadway capacity as no additional through lanes on Culver Boulevard or Little Culver Boulevard would be added. The project would not include new homes or businesses that could directly or indirectly result in growth. Therefore, project impact would be less than significant.

II. Police Protection

Less Than Significant Impact. The Culver City Police Department provides police protection services to Culver City and is located at 4040 Duquesne Ave. approximately 1 mile from the project site. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project would not include new homes, businesses, or increased roadway capacity that could directly or indirectly result in growth. Therefore, the project would not result in the need for additional police protection services and project impact would be less than significant.

III. Schools

Less Than Significant Impact. Demand for educational services is typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The proposed project would not increase housing or induce population growth through the generation of a substantial number of new jobs that could in turn increase the need for schools. Therefore, project impact would be less than significant.

IV. Parks

Less Than Significant Impact. Demand for park and recreational facilities is typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The proposed project site is not located on or directly adjacent to any of the public parks, therefore would not affect the user experience during construction. The project would not include new homes, businesses, or extension of roadway facilities that could directly or indirectly result in growth. Additionally, the landscaped median would likely result in an improvement to public recreational space available. Therefore, the project would not result in the need for additional parks, nor would it adversely impact the quality of public parks during construction, and a less than significant impact would result.

V. Other Public Facilities

Less Than Significant Impact. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project would not include new homes, businesses, or extension of roadway facilities that could directly or indirectly result in growth, and in turn increasing the need for new public facilities. Therefore, project impact would be less than significant.

Mitigation Measures:

No mitigation measures are required.

3.4.15 RECREATION

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b.	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Existing Conditions:

Parks

There are thirteen public parks within the City of Culver City, offering a variety of recreational facilities including sports fields, barbeques, picnic areas, playgrounds, etc. (City of Culver City 2018, Google Maps 2018).

Discussion:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. The proposed project is an existing roadway that would continue to be utilized as a roadway with the proposed project. Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The proposed project would not increase roadway capacity and the infrastructure improvements would be unmanned. Therefore, the proposed project would not generate increased demand on existing park and recreational facilities and project impact would be less than significant.

Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. As part of the proposed project, realignment of the bike path and pedestrian walkway is proposed. A primary purpose of the proposed project is to improve safety and mobility within this segment of Culver Boulevard. This would be considered a beneficial impact for pedestrians and bicycle users. The potential environmental impacts associated with the realignment are discussed throughout this document and mitigation measures have been identified by resource topic when warranted. The proposed project would realign an existing roadway and would not add new park facilities and no specific mitigation measures for park and recreation facilities are required and project impact would be less than significant.

Mitigation Measures:

No specific mitigation measures for park and recreation facilities are required.

3.4.16 TRANSPORTATION/TRAFFIC

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		X		
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				X
c.	Result in a change in air traffic patterns including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e.	Result in inadequate emergency access?		X		
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?		X		

Existing Conditions:

The existing street has 180-feet right-of-way and is configured with a 60-feet wide parkway and residential roadway on the north side, a 60-feet center island greenbelt, and another 60-feet arterial roadway and parkway on the south side. The south side carries almost all of the through traffic on two lanes in each direction with narrow parking on 1 side only. There is no signal at Culver Boulevard and Harter Avenue intersection. At the existing Culver Boulevard and Huron Avenue intersection, the signal is semi-actuated with only northbound approach lane having detection.

Culver Boulevard, within the project limits, is classified as a Primary Arterial in the General Plan Circulation Element with a posted speed limit of 40 miles per hour. Culver Boulevard's configuration west of Elenda Street and east of Sepulveda Boulevard mainly consists of a 50-foot wide main roadway with two lanes in each direction

and parking on the south side, a local 50-foot wide roadway known as "little" or "north" Culver Boulevard with one lane in each direction and parking on both sides, a 60-foot wide landscaped bicycle/pedestrian median (formerly the Southern Pacific Transportation Company property) separating the two roadways, and a 10-foot wide parkway on each side.

The main roadway is the southern third of the 180-foot wide street right-of-way; "little" Culver Boulevard is in the northern third; and the median constitutes the middle third of the right-of-way.

Discussion:

a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact with Mitigation Incorporated. A primary purpose of the proposed project is to improve safety and mobility within this segment of Culver Boulevard. While the proposed project would not increase roadway capacity, it would increase efficacy due to the addition of left turn lanes at Harter, Huron, and Little Culver. The proposed project improves intersections and enhances the non-motorized travel with rehabilitation of the pedestrian and bike paths. The project is designed to improve safety over existing conditions with the addition of signals and pedestrian crossing at Harter; an upgrade of the signal and pedestrian crossing at Huron; additional crosswalks and bulbouts; addition of left turn lanes and refuge lanes; and the addition of 5-feet buffer along the parking lane on the south side. Furthermore, the project is listed in the Southern California Association of Governments (SCAG) 2012-20135 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

A traffic signal warrant analysis for the proposed new traffic signal at the Harter Avenue and Culver Boulevard was performed by FPL and Associates in accordance with the 2014 edition of the California Manual for Uniform Traffic Control Devices (MUTCD). A copy of the Traffic Signal Warrant Analysis is included as Appendix F. The traffic data was evaluated using criteria from Warrant 3 to determine if a traffic signal is justified. Based on analysis performed, it was determined that a traffic signal is warranted per MUTCD Traffic Signal Warrant 3 Criteria B (FPL 2018).

MUTCD Section 4C.04 Criteria B states: *"The plotted point representing the vehicles per hour on the major street (total of both approaches) and the corresponding vehicles per hour on the higher-volume minor-street approach (one direction only) for 1 hour (any four consecutive 15-minute periods) of an average day falls above the applicable curve in Figure 4C-3 for the existing combination of approach lanes."*

The peak hour was found to be from 4:45 PM to 5:45 PM. A total 107 vehicles were counted on the east bound (EB) lane of Harter Avenue and 2,507 vehicles were counted for the north bound (NB) and southbound (SB) lanes of Culver Boulevard. Due to the fact that Harter Avenue is a minor street with one lane in each direction, the threshold volume to warrant a signal is 100 vehicles per hour along Harter Ave. Per Figure 4C-3 of the MUTCD, these values plot above the threshold curve and thus justify a new traffic signal. Despite the fact that the vehicle counts at Culver Boulevard and Harter Avenue were recorded on different days, the counts taken in June reflect that the volumes on Culver Boulevard will be well over 1,800 vehicles during this hour and thus the threshold value of 100 vehicles per hour along Harter Avenue still applies (FPL 2018).

Project construction would be short term and temporary. Construction activities may temporarily affect access on streets during certain periods of the day. Temporary lane closures may be required for limited duration and traffic control may be necessary during such activities. Therefore, mitigation measure TRAF-1 has been identified to require a traffic control plan. To the extent possible, it is recommended that hauling operations be scheduled to occur during off-peak hours of the surrounding roadway system (i.e., avoid 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM). After project construction is complete, trips generated by the long-term project operation would be similar to existing conditions since there would no increase in roadway capacity. Therefore, project impact is less than significant with mitigation incorporated.

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. The project would not conflict with the existing Los Angeles County Metropolitan Transit Authority (Metro) Congestion Management Program (CMP), which requires that intersections monitored by the program be analyzed under Metro's CMP criteria if a project is expected to generate 50 or more peak hour trips on a CMP-designated facility (Los Angeles County Metropolitan Transportation Authority, 2010). The proposed project would not result in any changes to peak hour trips on CMP-designated facilities since no increase in roadway capacity is proposed. Therefore, no project impact would result.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The project site is not located within 2 miles of a public airport or public use airport. The project area is approximately 2.4 miles southeast of the nearest airport, the Santa Monica Municipal Airport. The project would not generate any air traffic or have any features that would affect air traffic. Nor would the proposed project increase roadway capacity that could generate increased vehicular trips. Therefore, no project impact would result.

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. As noted above, a primary purpose of the proposed project is to improve safety and mobility within this segment of Culver Boulevard. The project is designed to improve safety over existing conditions with the addition of signals and pedestrian crossing at Harter; an upgrade of the signal and pedestrian crossing at Huron; additional crosswalks and bulbouts; addition of left turn lanes and refuge lanes; and the addition of 5-feet buffer along the parking lane on the south side. The project would not include design features, such as sharp curves or dangerous intersections that would increase hazards in the project area. Therefore, there would be no impact.

e. Would the project result in inadequate emergency access?

Less Than Significant Impact with Mitigation Incorporated. The project site is an existing roadway and would continue to be utilized as a public roadway with implementation of the proposed project. The proposed realignment was designed to improve safety including adequate emergency access. As a standard procedure, first responders would continue to have priority during an emergency.

Project construction would be short term and temporary. Construction activities may temporarily affect access on streets during certain periods of the day. Temporary lane closures may be required for limited duration and traffic control may be necessary during such activities. Therefore, mitigation measure TRAF-1 has been identified to require a traffic control plan to comply with applicable work area traffic control requirements. Coordination with the City's emergency service providers would be conducted to ensure that emergency response and evacuation can be properly conducted during construction. In addition, contractors typically would have steel plating available in the event excavations need to be quickly spanned. Aside from any needed temporary street work, no other disruptions to the local transportation system would occur, and substantial interruptions to emergency access are not anticipated. Therefore, project impact would be less than significant with mitigation incorporated.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant with Mitigation Incorporated. The project would include the realignment of the bike path and pedestrian walkway. The proposed project is intended to realign the existing raised median to accommodate increased pedestrian and bike travel and form a pedestrian and bike network to connect the schools east of Culver Boulevard with the residences west of Culver Boulevard. The scope of the project includes the modification of the existing signalized crossing of Culver Boulevard at Huron Avenue as well as the installation of a new traffic signal at Harter Avenue and Culver Boulevard to facilitate crossings. The project is designed to improve safety over

existing conditions with the addition of signals and pedestrian crossing at Harter; an upgrade of the signal and pedestrian crossing at Huron; additional crosswalks and bulbouts; addition of left turn lanes and refuge lanes; and the addition of 5-feet buffer along the parking lane on the south side. Furthermore, the project is listed in the Southern California Association of Governments (SCAG) 2012-20135 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). During short term and temporary construction activities, the temporary relocation of bus stops and other routes may be needed. Therefore, mitigation measure TRAF-1 has been identified to require a traffic control plan including coordination with the Transportation Department for any temporary relocation of bus stops. Within implementation of TRAF-1, project impact would be less than significant.

Mitigation Measures:

The following mitigation measure will be implemented:

TRAF-1: 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.

3.4.17 TRIBAL AND CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		X		
	ii.) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Existing Conditions:

On August 9, 2018, the Native American Heritage Commission (NAHC) was contacted by APRMI to request a Sacred Lands file search. The NAHC responded on September 4, 2018 that no Native American cultural resources were identified by their search as being within the proposed Project study area (APRMI 2018). The NAHC provided a list of Native American Contacts that may have information regarding tribal resources. The tribes, individuals, and organizations listed by the NAHC were contacted by phone on September 4th, 2018, to assure that the mailing information was correct and to inform them that a Project informational package would be mailed out to the recipient (APRMI 2018). A Project informational package was sent to each of the individuals listed by the NAHC on September 6th, 2018 (APRMI 2018). The following contacts were sent letters, Santa Ynez Band of Chumash Indians, Fernandeno Tataviam Band of Mission Indians, Barbareno/Ventureno Band of Mission Indians, Kitanemuk and Yowlumne Teion Indians, Gabrieleno/Tongya San Gabriel Band of Mission Indians, Gabrielino/Tongya Nation (and Tribe), San Manuel Band of Mission Indians, Kern Valley Indian Community, Soboba Band of Luiseno Indians, and the Gabrieleno Band of Mission Indians.

On September 12, 2018, Jairo Avila, Tribal Historic and Cultural Preservation Officer for the Fernandeno Tataviam Band of Mission Indians, emailed APRMI with a response on behalf of Rudy Ortega Jr. from the Fernandeño Tataviam Band of Mission Indians. Mr. Avila states that they will be deferring to the Gabrieleno Nation members regarding any tribal cultural resources within the Project area. On September 12, 2018, Patrick Tumamait responded to APRMI's letter and requested to be involved in all construction-related activities if any tribal cultural

resources are discovered and recommended Andrew Salas, Chairperson for the Gabrieleno Band of Mission Indians, to monitor the Project. On September 12, 2018 Andrew Salas, Chairperson for the Gabrieleno Band of Mission Indians, responded to APRMI's letter and requested to be involved in all Project related activities and to monitor the Project during construction activities.

Under CEQA, Assembly Bill (AB) 52 requires a lead agency to evaluate a Project's potential to impact "tribal cultural resources." In addition, AB 52 requires the lead agency to consult with any California Native American tribe that has previously requested that the lead agency provide the tribe with notice of such Projects and consultation and is traditionally and culturally affiliated with the geographic area of a proposed Project. Consultations must include discussing the type of environmental review necessary, the significance of tribal cultural resources, and the significance of the Project's impacts on the tribal cultural resources (as applicable), and alternatives and mitigation measures recommended by the tribe.

In accordance with AB 52, the City of Culver sent consultation letters to Native American individuals on October 31, 2018. The following contacts were sent letters:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation, and a local tribal descendent with traditional ties to the Project area (specifically the village of Atongai/Tamet and Tameobit and Najayabit).
- Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseno Indians

On November 2, 2018, Mr. Ontiveros responded by telephone to Mr. Lee Torres, P.E., Environmental Programs for the City of Culver, that the tribe does not request consultation for the Project.

Mr. Salas responded to Mr. Torres that he did want consultation and a conference call was conducted on November 6, 2018. Mr. Salas indicated the project area is highly sensitive for tribal cultural resources and that such resources may be encountered inadvertently during construction activity. Mr. Salas requested to be informed regarding construction activity and requested tribal monitoring during all construction activities and provided tribal mitigation measures to be implemented during project activities (Appendix G).

Discussion:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

I. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less Than Significant with Mitigation Incorporated. The SCCIC record search, archaeological survey, NAHC sacred lands search, Native American outreach, AB52 consultation determined that the Project area does not contain any known historic resources as defined by the CEQA Guidelines and Public Resource code (APRMI 2018). However, AB52 consultation did determine the Project area is highly sensitive for tribal cultural resources.

With implementation of Mitigation Measures TR-1, TR-2, and TR-3, impacts to tribal cultural resources would be less than significant.

II. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. The SCCIC records search, archaeological survey, NAHC sacred lands search did not identify any significant tribal cultural resources within or adjacent to the Project APE.

Tribal Consultation initiated by the City of Culver under AB52 with tribes determined the Project area is highly sensitive for tribal cultural resources and tribal monitoring was requested (see above). Mr. Salas provided *The Gabrieleno Band of Mission Indians – Kizh Nation, Protection of Tribal Cultural Resources (TCRs)* that includes measures that will be implemented during construction (Appendix G). The document outlines the protocols and guidelines to follow during construction and inadvertent discovery of tribal cultural resources and is provided below as TR-1, TR-2, and TR-3.

With implementation of Mitigation Measures TR-1, TR-2, and TR-3, project impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

The following mitigation measures shall be implemented:

TR-1: Retain a Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño 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 Gabrieleño 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 Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

TR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.

TR-3: Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

3.4.18 UTILITIES AND SERVICE SYSTEMS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		X		
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e.	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g.	Comply with federal, state, and local statutes and regulations related to solid waste?			X	

Existing Conditions:

The project site is within Culver City, Los Angeles County, and receives water supply from Golden State Water Company. Water supply within the service area is sourced from imported water from the Metropolitan Water District State Water Project (SWP) and Colorado River Aqueduct (Golden State Water Company 2018). The Culver City Sanitation Division provides waste services for all the City. The County of Los Angeles Sanitation Districts currently have two operational landfills, which are the Calabasas Landfill and the Scholl Canyon Landfill, and two recycling and materials recovery facilities which are the Puente Hills Materials Recovery Facility and the Downey Area Recycling and Transfer Facility (Sanitation Districts of Los Angeles County 2018).

Discussion:

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The project would not include elements that would generate wastewater or exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (RWQCB). Therefore, there would be no impact.

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project would include landscaping requiring irrigation, and water may be required during construction for cement mixing or stabilizing loose soils. However, the project would not include elements that would generate additional water or wastewater needs requiring the construction of new or expanded water or wastewater treatment facilities. A portion of the captured run-off that is proposed to be stored in the underground retention basin would be used to supplement the required irrigation for the proposed landscaping along the raised median and along Culver Boulevard. Therefore, project impact would be less than significant.

c. Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact with Mitigation Incorporated. Potential environmental impacts associated with the proposed project including construction of the proposed new stormwater drainage facilities are discussed by environmental resource topics throughout this document. While there are no specific mitigation measures for stormwater required; mitigation measures were identified for other environmental resource topics to reduce potential impacts associated with short term temporary impacts from construction. Therefore, project impact would be considered less than significant with mitigation incorporated.

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. A portion of the captured run-off that is proposed to be stored in the underground retention basin would be used to supplement the required irrigation for the proposed landscaping along the raised median and along Culver Boulevard. No new or expanded water entitlements are needed to service the proposed project needed. Therefore, project impact would be less than significant.

e. Has the wastewater treatment provider that serves or may serve the project determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. No new or expanded wastewater service is needed as part of long-term project operations. During project construction a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. The proposed project would not generate wastewater upon operation of the project. Therefore, project impact would be less than significant.

f. Is the project served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. Although some solid waste would be generated by the proposed project, the amounts would be minimal and are not anticipated to adversely affect landfill capacity. Project construction waste would be recycled to the extent feasible. Once operational, waste generation from the proposed project would primarily be from routine maintenance activities similar to existing conditions. Therefore, project impact would be less than significant.

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. The proposed project would comply with applicable federal, state, and local statutes and regulations related to solid waste. Project construction waste would be recycled to the extent feasible. Once operational, waste generation from the proposed project would primarily be from routine maintenance activities that would not be a significant source of new waste. Therefore, project impact would be less than significant.

Mitigation Measures:

No mitigation measures are required.

3.4.19 MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X		
b.	Have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X		
c.	Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X		

Discussion:

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. As discussed above in sections 3.4.4 Biological Resources, 3.4.5 Cultural Resources, and 3.4.17 Tribal Cultural Resources, mitigation measures are needed to reduce potential biological and cultural impacts during project construction activities. Therefore, with implementation mitigation measures as identified in this IS/MND, project impact on biological and cultural resources would be less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact with Mitigation Incorporated. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. A primary purpose of the proposed project is to improve safety and mobility within this segment of Culver Boulevard.

This would be considered a beneficial impact of the proposed project. The Culver Boulevard Stormwater Treatment component was incorporated as part of this project in 2016 as part of the City's commitment towards addressing water quality issues with Ballona Creek. As a result, this feature would address the Los Angeles Regional Water Quality Control Board's Municipal Separate Storm Sewer System Permit (Order No R4-2012-0175) and the City's responsibility under the Ballona Creek Watershed Enhanced Watershed Management Program (EWMP). The water quality infrastructure improvements would be considered a beneficial impact in comparison to existing conditions. The potential environmental impacts associated with the proposed project are discussed throughout this document and mitigation measures have been identified by resource topic when warranted to reduce construction impacts and no additional mitigation measures are required for cumulative impacts.

c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. The proposed project would realign Culver Boulevard and would include new subsurface infrastructure improvements to improve water quality. The project site is an existing roadway that would continue to be utilized as a roadway with implementation of the proposed project. A primary purpose of the proposed project is to improve safety and mobility within this segment of Culver Boulevard that would be considered a beneficial impact of the proposed project. The Culver Boulevard Stormwater Treatment Capture component was incorporated as part of this project in 2016 as part of the City's commitment towards addressing water quality issues with Ballona Creek. As a result, this feature would address the Los Angeles Regional Water Quality Control Board's Municipal Separate Storm Sewer System Permit (Order No R4-2012-0175) and the City's responsibility under the Ballona Creek Watershed Enhanced Watershed Management Program (EWMP). The water quality infrastructure improvements would be considered a beneficial impact in comparison to existing conditions. The potential environmental impacts associated with the proposed project are discussed throughout this document and mitigation measures have been identified by resource topic when warranted to reduce construction impacts and no additional mitigation measures are required.

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