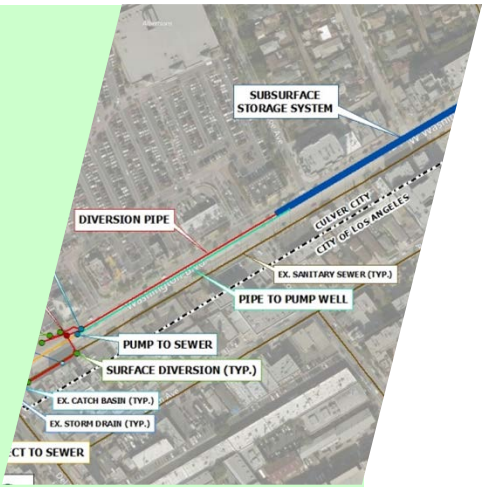
Initial Study and Mitigated Negative Declaration

City of Culver City

Washington Boulevard Stormwater and Urban Runoff Diversion Project



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Initial Study and Mitigated Negative Declaration

Washington Boulevard Stormwater and Urban Runoff Diversion Project

FINAL

Prepared for:

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Acronyms

CEQA	California Environmental Quality Act
CCR	California Code of Regulations
COLA	City of Los Angeles
EWMP	Enhanced Watershed Management Program
FMMP	Farmland Mapping and Monitoring Program
IS/MND	Initial Study/Mitigated Negative Declaration
LACFCD	Los Angeles County Flood Control District
LABOS's	Los Angeles Bureau of Sanitation's
MS4	Municipal Separate Storm and Sewer System
NAHC	Native American Heritage Commission
O&M	Operations and Maintenance
PEIR	Program Environmental Impact Report
RCP	Reinforced Concrete pipe
VFD	Variable Frequency Drive
USEPA	Unites States Environmental Protection Agency

1. Introduction

The California Environmental Quality Act (CEQA) Initial Study and Mitigated Negative Declaration (IS/MND) has been prepared on behalf of the City of Culver City (City) to identify potential site-specific environmental constraints associated with the Washington Boulevard Stormwater and Urban Runoff Diversion Project located along Washington Blvd, from just west of Carter Avenue (within City of Los Angeles), and Redwood Avenue (Culver City) to the east. This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.), and the State CEQA Guidelines (Title 14, California Code of Regulations (CCR) §15000 et seq).

This IS/MND is an information documentation intended for use by the City of Culver City and members of the general public as a preliminary analysis to determine if there is substantial evidence that the Project may have significant effects on the environment. If site-specific environmental constraints are found to potentially have a significant effect on the environment, with mitigation, a site-specific Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a negative declaration or MND. This IS/MND was compiled for the City with the assistance of CWE. The City is serving as the Lead Agency for the proposed Project pursuant to CEQA §21067 and CEQA Guidelines Article 4 and §15367. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a Project.

1.1 Purpose and Document Organization

The purpose of this document is to evaluate the potential environmental effects of the proposed Project. Mitigation measures, if required, have been incorporated into the project to eliminate potential significant impacts or reduce them to a less-than-significant level.

This IS/MND is organized as follows:

- Section 1 – Introduction
- Section 2 – Project Description
- Section 3 – Initial Study/Environmental Checklist
- Section 4 – References

The Los Angeles County Flood Control District (LACFCD) Enhanced Watershed Management Programs (EWMPs), Program Environmental Impact Report (PEIR) was used to tier off, and to evaluate and determine the potential environmental impacts of the proposed project.

1.2 Summary of Findings

The CEQA Appendix G Environmental (Initial Study) Checklist is included in **Section 3**. The Initial Study Checklist identifies potential environmental impacts, by sections, and provides a brief discussion of each impact resulting from implementation of the proposed Project. The project is categorized as a Structural (Regional Capture, Detention, and Use) within the PEIR as it is considered a regional capture project with detention).

2. Project Description

The City of Culver City (City) as the lead agency is implementing the Washington Boulevard Stormwater and Urban Runoff Diversion Project (Project), located along Washington Boulevard, from just west of Carter Avenue (within the City of Los Angeles), and Redwood Avenue (Culver City) to the east, to capture stormwater and urban runoff from a drainage area of approximately 40 acres. The project is jointly funded by the City and Costco. The drainage area is comprised of commercial and residential land uses and is primarily within the City boundaries. The Project is anticipated to address discharges from this portion of the watershed to the Marina del Rey (MdR) Watershed and expected to capture approximately 132,000 cubic feet of stormwater runoff during a 85th percentile rain event. The MdR Watershed is comprised of 1,409 acres, 40 acres of which is within the City's jurisdiction. The largest parcel within those 40 acres is associated with Costco, which is within a 16-acre parcel at the westernmost edge of the City. This Project involves a public-private partnership between the City and Costco and was identified in the MdR EWMP.

The goal of the Project is to reduce the quantity of pollutants reaching the MdR Harbor through the discharge of stormwater and dry-weather runoff. The Project will capture runoff before it enters the Municipal Separate Storm and Sewer System (MS4) and store it in an underground storage tank. Three days after a storm event is over, the retained runoff will be released from the tank and pumped to the sanitary sewer. Runoff will then be treated at the Hyperion Water Treatment Plant. The general project concept is shown in **Figure 2-1** below.

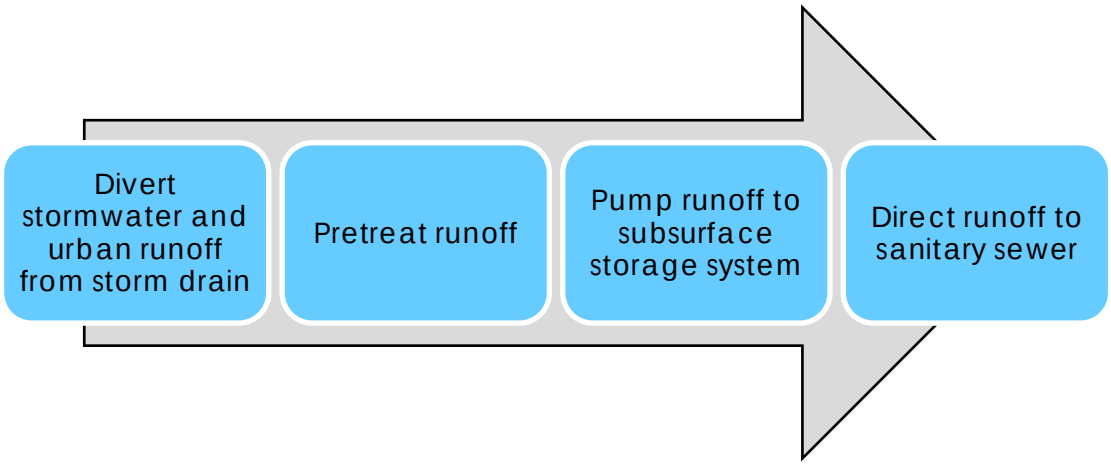

Figure 2-1 General Project Concept

The current concept is summarized in **Table 2-1**. **Figure 2-2** and **Figure 2-3** as shown below**,** illustrate the design approach.

Table 2-1 Summary of Proposed Project

Component	Design Approach
Diversion	Flows will be diverted at several locations. Surface diversions will be implemented at four locations on Washington Boulevard, as shown in the figure. A diversion will also be constructed off the private Costco storm drain (42-inch Reinforced Concrete Pipe [RCP]) within the public right-of-way. This approach avoids Los Angeles County Flood Control District (LACFCD) permitting, and maintains a shallower system. The surface diversions will be sized based on the tributary 85th percentile, 24-hour storm event peak runoff.
Pretreatment	Pretreatment unit will be proposed downstream of the surface diversions. The proposed pretreatment system will be sized to accommodate the 85th percentile, 24-hour storm event peak runoff from the full drainage area including Costco.
Diversion Pump (High Flow Pump)	A Variable Frequency Drive (VFD) pump will be placed in a wet well downstream of the diversions and pretreatment. The pump will be sized to accommodate the 85th percentile, 24-hour storm event peak runoff from the Project's full drainage area.
Subsurface Storage System	Flows will be pumped into the subsurface storage system, which will be sized based on the 85th percentile, 24-hour storm event volume associated with the full drainage area. Various subsurface storage system products from local vendors are being evaluated in an effort to optimize sizing, minimize cost, and mitigate traffic concerns to the extent practical.
Pump to Sewer (Low Flow Pump)	Flows will be conveyed from the subsurface storage system via gravity flow back to a wet well in close proximity to the diversion pump. Flows will be pumped using a VFD pump to the sanitary sewer. Discharge to the sewer will not occur until at least 72 hours following a storm event and the rate will be determined based on the City of Los Angeles Bureau of Sanitation's (LABOS's) requirements. It is anticipated that the discharge rate will be 280 gallons per minute (gpm). The discharge line will be installed using trenchless installation methods.

Figure 2-2 Subsurface Storage System Approach

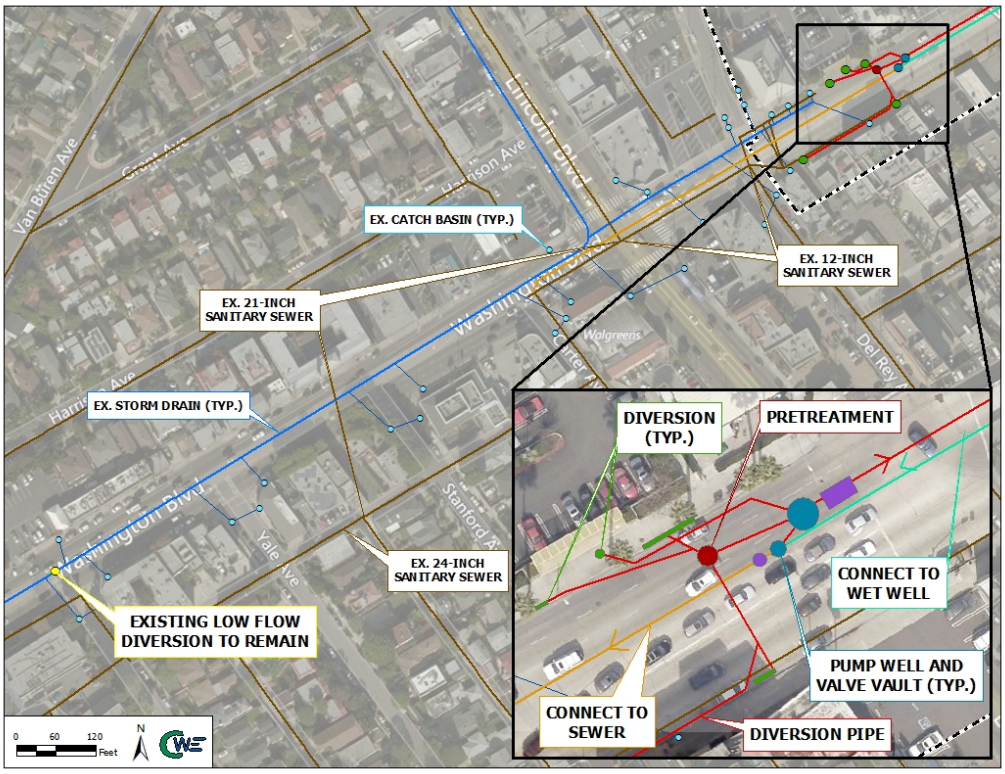

Figure 2-3 Diversion and Sewer Connection Approach

2.1 Project Location

The proposed Project will be constructed in the City of Culver City, in Los Angeles County, California. The City of Culver City is located in the western part of Los Angeles County. The Project site is located along Washington Boulevard from just west of Carter Avenue to Redwood Avenue to the east.

3. Initial Study/ Environmental Checklist

Environmental Checklist Form		
1.	**Project Title:**	Washington Boulevard Runoff Diversion Project
2.	**Lead Agency Name and Address:**	City of Culver City 9770 Culver Blvd., Culver City, California 90232
3.	**Contact Person and Phone Number:**	Lee Torres, PE (310) 253-5600
4.	**Project Location:**	Washington Blvd in the Culver City, California
5.	**Project Sponsor's Name and Address:**	City of Culver City 9770 Culver Blvd., Culver City, California 90232
6.	**General Plan Designation:**	Public Streets and Regional Commercial
7.	**Zoning:**	Commercial
8.	**Description of Project:**	The Project will capture runoff before it enters the MS4 and store it in an underground storage tank. Three days after a storm event is over, the retained runoff will be released from the tank and pumped to the sanitary sewer. Runoff will then be treated at the Hyperion Water Treatment Plant.
9.	**Surrounding land uses and setting:**	Single-family residential, commercial, and multi-family residential
10.	**Other public agencies whose approval is required:**	City of Los Angeles County of Los Angeles Department of Public Health California Coastal Commission
11.	**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?[a]**	Yes, the Native American Heritage Commission (NAHC) was consulted. The LACFCD's PEIR indicates that a review process took place from August 29th to September 29th, 2014. NAHC provided a response letter on September 25, 2014 requesting specific consultation for projects. A project specific consultation with the NAHC was conducted in June 2018. Additionally, meetings were held with Gabrieleno Band of Mission Indians - Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, and Gabrieleno/Tongva San Gabriel Band of Mission Indians in July and August 2018.

[a.] Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The environmental factors checked below 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		

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.

Signature _____ Date 12/13/18

3.1 Aesthetics

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

The PEIR noted potential impacts to scenic vista's and visual character. The impact determined was related to the aboveground pump stations and structures. The current project does not propose any major above ground structures like pump stations. The pump stations proposed for this project will be located underground with some electrical housing located along the public street right-of-way.

The construction will temporarily be located primarily within existing sidewalks and streets. The presence of construction equipment and materials would be visible from public vantage points but would not affect any views for longer than the temporary construction period.

Therefore, construction and operation of this project and structural BMP improvement would not permanently affect views or scenic vistas and will not contribute to aesthetic impacts.

3.2 Agriculture and Forestry Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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 (FMMP) 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 by 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

Discussion:

The City of Culver City contains very little agricultural or forest land, as the majority of the land is urbanized. The project will not change any designated land uses as the project will be located and implemented within a roadway and within already established urban areas and therefore, not anticipated to impact agriculture and forestry resources. No further analysis is required.

3.3 Air Quality

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

The PEIR analyzed potential impacts to air quality due to construction activities. These construction activities would temporality create emissions of dust, fumes, equipment, and other contaminants. For Regional BMP projects, the maximum daily level of construction-generated emissions of NOx was anticipated to exceed regional thresholds. The remaining criteria pollutants (i.e., ROG, CO, SOx, PM_{10} and $PM_{2.5}$) would not exceed the regional thresholds. However, these emissions would not be significant with the mitigation measures (AIR-1, and AIR-2) noted in the PEIR, which include the use of low-emission equipment meeting Tier II emissions standards at a minimum and Tier III and IV emissions standards where available as CARB-required emissions technologies become readily available to contractors in the region. Exhaust from construction equipment may also produce discernible odors typical of most construction sites. Such odors would be a temporary source of nuisance to adjacent uses, but because they are temporary and intermittent in nature, would not be considered a significant environmental impact. Impacts associated with objectionable odors during construction would be less than significant. Additionally, the City shall encourage contractors to use lower-emission equipment through the bidding process where appropriate. In addition, the project would not result in long-term emissions of air pollutants and would not exceed the SCAQMD thresholds of criteria pollutants. No further analysis is required.

Mitigation Measures:

AIR-1 - The City will require the use of low-emission equipment meeting Tier II emissions standards at a minimum and Tier III and IV emissions standards where available as California Air Resources Board (CARB) required emissions technologies become readily available to contractors in the region.

AIR-2 - The City will encourage contractors to use lower-emission equipment through the bidding process where appropriate.

3.4 Biological Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game 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 Game or US 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

Discussion:

Construction of the proposed project is expected to occur within high-density urban, commercial, industrial and transportation areas. The construction impact area will be within already developed areas and adjacent to existing infrastructure that do not support biological resources including any native vegetation or undisturbed habitat. Therefore, no impacts to biological resources are anticipated. No further analysis is required.

3.5 Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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 dedicated cemeteries?				X

Discussion:

This project will be implemented along the roadway and in a public and highly urbanized area but could potentially cause impacts on cultural and paleontological resources during the construction phase. The PEIR recommends for projects that require ground disturbance to be subject to a Phase I cultural resources assessment and consultation with native tribes as required by Senate Bill (SB) 18.

A Cultural Resources Assessment was conducted for the Project by Cogstone Resources Management, Inc. in June 2018. The assessment was conducted to identify previously recorded cultural resources (prehistoric and historic archeological sites, historic buildings, structures, objects, or districts). Cogstone assessment included a California Historic Resources Information System (CHRIS) records search at the South Central Coastal Information Center, Native American scoping, and extensive background research. In addition to the records search, Cogstone's research consisted of consulting several other sources to collect information on the cultural context of the Project Area; sources included the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), California Historical Resources Inventory (CHRI), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). In addition, Cogstone also requested a Sacred Lands File Search from the Native American Heritage Commission (NAHC). The cultural resources assessment search included the entire Project Area and a 0.5-mile radius buffer.

In June, 2018 Cogstone received confirmation from the Native American Heritage Commission (NAHC) that the Project Area is negative for known sacred sites and provided eight tribes affiliated with the Project Area and recommended that they be consulted for information on potential tribal cultural resources. Cogstone assisted the City, under Assembly Bill (AB) 52, in contacting all eight tribal organizations. However, only three tribal organizations, Gabrieleno Band of Mission, Gabrieleno/ Tongva San Gabriel, and the Gabrielino Tongva Indians of California Tribal, responded to the City's request. The

three tribal organizations provided their concerns, with one tribe (Gabrielene/ Tongva San Gabriel) stating that the area was culturally and spiritually sensitive and it was an area of concern for the tribe. The tribes also requested for an archeological and Native American monitor to be present during construction in addition for the excavated fill to be inspected by the monitors for cultural remains prior to removal from the project site. One of the tribal organizations requested to be included/ informed as the project progresses.

Cogstone's records search and consultation with University of California, Los Angeles, Fowler Museum, and the Los Angeles County Natural History Museum, indicated that no cultural resources have been previously recorded within the Project Area. However, two resources were documented outside the Project Area and within 0.5 mile search radius. The two recorded resources were identified as archeological, one historic and one prehistoric. The assessment reported for the potential for intact subsurface cultural resources as low due to the absence of known cultural resources and sacred sites within the Project Area and due to the insufficient information on known cultural resources in the surrounding vicinity.

Mitigation Measures for cultural resources will be implemented to avoid potential impacts to tribal cultural resources and/or reduce them to less than significant level.

Mitigation Measures:

CUL-1 - If previously unidentified cultural resources and/or tribal cultural resources are unearthed during ground activity, all work shall immediately be suspended within 100 feet of the discovery and the City shall be immediately notified. A qualified archaeologist shall assess the significance of the find and determine if it is a California Register of Historical Resources (CRHR)-eligible archaeological resource and/or tribal cultural resource. If the qualified archaeologist determines that adverse impacts to tribal cultural resources or significant archaeological resources could occur during the Project, then the resources shall be avoided from direct Project impacts by Project redesign, if feasible. If the resource cannot be avoided, then an archaeological treatment plan shall be developed and implemented.

CUL-2 - In compliance with Section 5097.98 of the Public Resources Code and Section 7050.5 of the California Health and Safety Code, if human remains are encountered, all ground disturbing activities shall be immediately suspended within 100 feet of the discovery, and the Los Angeles County Coroner should be notified immediately. If the Coroner determines the remains are Native American in origin, they must notify the Native American Heritage Commission within 24 hours of such identification so that the Native American Heritage Commission can contact the Most Likely Descendant (MLD). The MLD shall be provided access to the discovery and will provide recommendations for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements set forth in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code and CEQA Guidelines Section 15064.5.

3.6 Geology and Soils

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

Geotechnical investigations have already been conducted in the past for this particular project location and did not identify potential geologic hazards from fault rupture, shaking, liquefaction, and landslides. The project is located on flat terrain and impervious. Implementing the design requirements in the California Building Code and local ordinances, and ensuring that the structural BMP is constructed in compliance with the applicable laws, regulations, and policies, including the LID Ordinances, would

ensure that the structural BMP is constructed in a manner that avoids impacts and damages. No further analysis is required.

3.7 Greenhouse Gas Emissions

Would the project:

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

Discussion:

As discussed in the impact analysis, the Greenhouse Gas (GHG) emissions generated by the proposed project would not exceed the SCAQMD's recommended threshold of 3,000 $MTCO_2e$ /year for non-industrial projects. The primary source of GHG emissions generated by the project would occur only during construction, which would be temporary in nature. Additionally, as the structural BMP is not a land use project, GHG emissions associated with mobile sources would only occur from periodic vehicle trips by workers to the structural BMP site for inspection and maintenance purposes, which would not generate substantial emissions. The annual GHG emissions associated with the operation of the underground pump for the structural BMP would also be minimal relative to the GHG emissions generated during construction of this structural BMP. Based on analysis presented in the PEIR, the project is not expected to result in substantial GHG emissions into the environment or contribute to climate change impacts. No further analysis is required.

3.8 Hazards and Hazardous Materials

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 which 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 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?			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

Discussion:

Construction activities required for this project will potentially involve excavation, grading, drilling, trenching, and other ground-disturbing activities. These anticipated construction activities may require the transport, storage, use, and disposal of small amounts of hazardous materials that may include gasoline, diesel, hydraulic fluids, oils and lubricants and other similarly related materials for the project site. These types of materials are currently used for general purposes and not new materials that will be introduced to this area. The City and the construction contractor will be required to comply with all relevant and applicable federal, state and local laws and regulations that pertain to the transportation, storage, use and disposal of hazardous materials and waste during the construction program. Based on analysis presented in the PEIR (Section 3.7.3), the project is not expected to result in significant hazards to the public, and with incorporation of mitigation measures of HAZ-1 from the PEIR will have less than significant impacts. In addition, the project site is not located on a hazardous materials sites list as the project is located on the public street right-of-way. The site is located within a quarter mile of Venice High School, however, as discussed above, the project shall not introduce any new materials that are already located within the project vicinity. The site is also not located within the City of Santa Monica's airport land use area or within 2 miles of a private airstrip.

Mitigation Measures:

HAZ-1 – The City will prepare and implement maintenance practices that include periodic removal and replacement of sediments and media that may accumulate constituents. The City will prepare an Operations and Maintenance (O&M) Plan upon approval of the project that identifies the frequency and procedures for removal and/or replacement of accumulated debris and/or media to avoid accumulation of hazardous concentrations.

3.9 Hydrology and Water Quality

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 which 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

Discussion:

The proposed Project will reduce off-site stormwater runoff from the first 85th percentile rainfall by capturing that runoff and eventually pumping it into the sanitary sewer system. As a result, the captured runoff will reduce pollutants entering the MdR Watershed and the Santa Monica Bay. The Project is a proven and effective technology in reducing potential sources of polluted runoff to the waterways.

BMPs will be implemented for the construction phase of this project to comply with the MS4 Permit requirements and prevent any impacts to water quality during construction. The Project will therefore not have any negative impacts. No further analysis is required.

3.10 Land Use and Planning

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

No land use planning impacts have been identified in the PEIR analysis as a result of the implementation of similar projects. The project is being constructed on urbanized land primarily on streets and sidewalks and will therefore, not conflict with existing land zone uses. The Project does not conflict with any programs or plans. A very small portion of the construction will be conducted within the Coastal Zone and the City will apply for a waiver of the Coastal Development Permit from the California Coastal Commission as there will be no new aboveground structures created by the Project. No further analysis is required.

3.11 Mineral Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

The project is being implemented within a largely already urbanized area and is therefore not anticipated to contribute to impacts in mineral resources. No further analysis is required.

3.12 Noise

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

Equipment used during these construction activities produce noise and vibration which have the potential to negatively impact the surrounding community. The PEIR noted potential impacts to noise levels due to construction activities/equipment. A Construction Noise and Vibration Assessment Study has been conducted which predicts the noise and vibration levels at nearby homes and businesses during the various construction phases. Daytime construction noise limits were set based on the Cities of Los Angeles and Culver City's Municipal Codes for a maximum noise level for powered equipment of 75 dBA. The nighttime construction noise limit was set to 5 dBA above the measured nighttime ambient noise level which was determined to be 61 dBA. Therefore, the nighttime noise limit for this project is 66 dBA.

The three dimensional graphics oriented noise modeling program that was used for the study predicted an exceedance of noise limit at several locations within the construction project within the different construction stages. In some instances and depending on the construction activity, the noise levels are predicted to exceed the limit by up to 25 dBA.

The predictions in the Construction Noise and Vibration Assessment study indicate an exceedance of noise limits for construction operations and activities if no mitigation measures are put in place. However, once mitigation measures are implemented, for the different construction activities and throughout the different stages, the noise impacts exceedance of less than 1dBA are predicted.

The construction vibrations levels were predicted using methodologies described in the Caltrans and Federal Transit Authority Noise and Vibration Guidance Manuals. Based on these manuals, the vibration limits were set to 0.5 in/sec Peak Particle Velocity (PPV) for the type of equipment that will be used in this project. The Construction Noise and Vibration Assessment Study indicate no risk of exceeding the vibration limits and no damage risk is expected with the majority of equipment that will be used in this project, as long as the minimum distance to buildings and structures are followed for no impact to occur. The study did indicate however that vibration caused by pile driving may risk exceeding the damage criteria of 0.5 in/sec PPV at some nearby buildings and it is recommended for large vibration producing equipment to be placed as far as is feasible from vibration sensitive receivers.

Mitigation Measures:

NOISE-1 - Recommended General Noise Control Measures

- Prepare visible signs indicating “Noise Control Zone”
- Use noise-control devices that meet original specifications and performance
- To the extent practical, use electrically-powered equipment
- Implement temporary noise barriers and sound-control curtains where project activity is unavoidably close to noise-sensitive receivers
- Designate haul routes to be used based on the least overall noise impact route, with heavily-loaded trucks away from residential streets, if possible. Identify haul routes streets with the fewest noise sensitive receivers if no alternatives are available.
- Place earth-moving equipment, fixed noise-generating equipment, stockpiles, staging areas, and other noise-producing operations as far as practicable from noise-sensitive receivers
- Eliminate the use of horns, whistles, alarms, and bells
- Phase demolition, earth moving, and ground impacting operations so they do not occur in the same time period
- In the case of nighttime construction, the contractor shall comply with the provisions of the nighttime noise variance issued by the City
- Conduct periodic noise measurements in accordance with an approved noise monitoring plan, specifying monitoring locations, equipment, procedures, and schedule of measurements and reporting methods to be used

NOISE-2 - Recommended Project Specific Noise Control Measures

- Implementation of noise barriers – Noise from most operations can be effectively mitigated through the use of temporary noise barriers, noise control curtains, and/or noise enclosures. Properly construct noise barriers of 8 feet and 12 feet tall around the respective work sites to remove noise impacts from the different operation areas. Without additional mitigation measures noise exceedances would still remain. Use the following recommended noise barrier properties:
  - Break line of sight from noise source to receiver
  - Use a frame to secure an appropriate acoustic blanket or paneling
  - Use a solid material with a minimum surface density of 3 lb/ft^2 or mass-loaded acoustic blankets with at least STC 25
  - Overlap or seal any gaps in the barriers
- Drilled Piles - Pile driving is a dominant noise source for several operation areas and a noise barrier is insufficient to eliminate impacts at many nearby receivers. Both vibratory and impact pile driving produce similar noise levels; use of vibratory pile driving may remove vibration impacts but it likely will not change the noise levels. It is recommended to use drilled piles and an 8-foot noise barrier to remove noise impacts for those operation areas.
- Shielding with Cross Bracing - Instead of using sheet piles to retain the walls of excavation, the contractor may excavate the trench and shore up the walls with shields and cross bracing. The heavy equipment that would be used for this method is less noisy than pile driving, and no noise exceedances would be expected using this method and an 8-foot noise barrier surrounding the site.
- Piling Noise Enclosures - The use of a noise enclosure specifically around the pile driver and pile may reduce the noise to acceptable levels, though not necessarily eliminate them completely at the closest receivers. Use of these enclosures have shown that they may provide up to 10 dB of noise reduction if properly designed and constructed. Some pile driving equipment manufactures may provide factory installed noise suppression systems.
- Backup Alarms - It is recommended that low impact backup alarms be used during nighttime hours. Examples of such alarms are white sound, broadband or multi-frequency type devices.
- Pavement Grinding - Traffic striping on Washington Boulevard will be removed. This is typically done via sandblasting or pavement grinding, both of which are loud activities. Grinding is the quieter of those two options, and would reduce the noise at receivers compared to sandblasting but exceedances would still remain. A movable noise barrier at least 8-feet tall or an acoustically attenuating shield on the equipment would help further reduce the noise to acceptable levels.

Recommended Vibration and Control Measures - Vibration caused by pile driving may risk exceeding the damage criteria of 0.5 in/sec PPV at some nearby buildings. Generally, large vibration producing equipment should be placed as far as is feasible from vibration sensitive receivers, with special attention to nighttime work and residential receivers. The following are recommended options for reducing vibration levels due to construction activities:

- Sonic Pile Driving - At the upper range reference vibration for the sonic/vibratory pile driver, the risk for damage to nearby buildings begins when the equipment is 32 feet or closer to the structure. The nearest piling is expected to be 35 feet from the closest structure, so a vibratory

pile driver would remove all vibration limit exceedances. However, noise impacts would remain with this equipment.

- Drilled Piles - Noise emission levels from bored/drilled pilling methods are approximately 15 dB lower and PPV levels may be more than 15 times lower than those due to traditional impact piling. The use of these methods will eliminate the vibration impacts of all receivers. These methods will also substantially reduce the noise impacts and in most cases they will also be eliminated, with the use of a suitable noise barrier.
- Hammer Energy - A recommended way to reduce PPV is to lower the hammer energy since there is a direct relationship between hammer energy and the resultant ground vibration. Ground PPV generally follows a square root relationship with hammer energy (i.e. PPV ~ √Hammer Energy). The degree of hammer energy reduction must be balanced against the likelihood/severity of expected exceedances, increase in total driving time, and ability to drive to required friction tolerances.
- Pre-construction Survey - A before and after survey should include inspecting building foundations and taking photographs (or installing crack monitors) of pre-existing conditions, cracks, or other flaws. The survey can be limited to buildings closest to the pile driving activities, except for the case of unusually fragile or historic structures that are located within approximately 200 feet of construction. The assessment didn't identify historic structures within the 200-foot screening distance to work sites. However, the Lind Building at 13323 W. Washington Boulevard is of a unique architecture (though of modern construction) and sits directly in front of the piling that will occur during one of the operations.
- Vibration Monitoring - It is recommended that vibration monitoring be conducted at any building where equipment is operating closer than the limits in the study.

3.13 Population and Housing

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

Discussion:

The Project will be constructed along sidewalks and streets and in a public urbanized area and will not displace existing people or housing. Therefore, this project is not expected to have impacts to population or housing. No further analysis is required.

3.14 Public Services

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
Fire protection?		X		
Police protection?		X		
Schools?			X	
Parks?			X	
Other public facilities?			X	

Discussion:

The proposed project will be installed to divert stormwater runoff and treat existing water quality impairments and would not contribute to an increased need for fire protection or police protection services. The structural BMP is not a habitable structure, would not be constructed with flammable materials, and would not require fire protection services. Because of the relative scale of the project, the construction of the structural BMP is not expected to result in the increase of population, require additional police, fire, emergency services or result in construction of new schools.

Consistent with the PEIR, the project will incorporate mitigation measure PS-1 and provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities. No further analysis is required.

Mitigation Measure:

PS-1 - The City shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed Project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform the public of the status of the construction activities.

3.15 Recreation

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				X
b) 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?				X

Discussion:

The project is located within a public street right-of-way. The project would not increase the use of existing neighborhood and regional parks or the construction or expansion of recreational facilities. No further analysis is required.

3.16 Transportation and Traffic

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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		

Discussion:

The PEIR identifies potential impacts to transportation and traffic due to construction activities of the Project. Impacts include an increase in construction-related traffic levels, which would temporarily increase the levels of congestion on the roadway where the construction project would occur. Vehicle trips would be generated by construction workers commuting to and from the work site, by trucks hauling materials and equipment to and from the site, in addition to Costco employees and customers entering and exiting the shopping center and all other commuters driving through the Project Area. Construction equipment would be delivered to and removed from the site based on construction

demands. The project construction will require reduction of travel lanes as the project construction will occur within the travel lanes and will require space for the construction and construction vehicles and materials placement. The primary off-site impacts resulting from the movement of construction trucks would include a short-term and intermittent lessening of roadway capacities due to the slower movements and larger turning radii of the trucks compared to passenger vehicles, in addition to a temporary partial closure of traffic lanes, along Washington Blvd. The project site also has bus stops west of Glencoe Avenue. Santa Monica Big Blue Bus, Culver City Bus, and the Los Angeles Metropolitan Buses service the site. To reduce project impacts, the bus stops will be relocated further west so as not to restrict the through traffic in the one westbound lane that is available during construction.

To reduce the potential construction traffic impacts associated with the project, Mitigation Measure TRAF-1 will be implemented; it would require all construction activities to be conducted in accordance with an approved construction Traffic Management Plan (TMP). This would serve to reduce the construction-related traffic impacts to the maximum extent feasible.

It is recommended that Mitigation Measures be implemented to ease the potential impacts. A TMP will be implemented throughout the construction phase. In addition, a SYNCHRO model will also be developed for modeling and optimizing traffic signals timings. The TMP will describe procedures and protocols for site access, traffic routing and management, and Costco's policy with respect to vehicles and employees transportation during the construction operations.

Once the project is complete occasional minor impacts to traffic would result as O&M activities for the pretreatment device, pumping system, and appurtenances will be conducted. Partial traffic lane closures along Washington Boulevard will occur to have full access to the pretreatment device, pumping systems and appurtenances. However, these will be temporary in nature and will be conducted outside of peak traffic hours. The City will prepare an O&M Plan upon approval of the project that identifies the frequency and procedures for maintenance activities.

Mitigation Measures:

TRAF-1 - The City shall prepare a construction TMP. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- Develop a plan to coordinate with facility owners or administrators of police and fire stations, hospitals, and schools and provide advance notification of the timing, location, and duration of construction activities and road closures.
- Coordinate with the Santa Monica Big Blue Bus, Culver City Bus, and the Los Angeles Metropolitan Bus service to temporarily relocate bus stop during construction.

3.17 Tribal and Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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		

Discussion:

A Cultural Resources Assessment was conducted for the Project by Cogstone Resources Management, Inc. The assessment was conducted to identify previously recorded cultural resources (prehistoric and historic archeological sites, historic buildings, structures, objects, or districts). Cogstone assessment included a California Historic Resources Information System (CHRIS) records search at the South Central Coastal Information Center, Native American scoping, and extensive background research. In addition to the records search, Cogstone's research consisted of consulting several other sources to collect information on the cultural context of the Project Area; sources included the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), California Historical Resources Inventory (CHRI), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). In addition, Cogstone also requested a Sacred Lands File Search from the Native American Heritage Commission (NAHC). The cultural resources assessment search included the entire Project Area and a 0.5-mile radius buffer.

In June, 2018 Cogstone received confirmation from the NAHC that the Project Area is negative for known sacred sites and provided eight tribes affiliated with the Project Area and recommended that they be

consulted for information on potential tribal cultural resources. Cogstone assisted the City, under AB 52, in contacting all eight tribal organizations however, only three tribal organizations responded to the City's request. Gabrieleno Band of Mission, Gabrieleno/ Tongva San Gabriel, and the Gabrielino Tongva Indians of California Tribal. The three tribal organizations provided their concerns, with one tribe (Gabrielene/ Tongva San Gabriel) stating that the area was culturally and spiritually sensitive and it was an area of concern for the tribe. The tribes also requested for an archeological and Native American monitor to be present during construction in addition for the excavated fill to be inspected by the monitors for cultural remains prior to removal from the project site. One of the tribal organizations requested to be included/ informed as the project progresses.

Cogstone's records search and consultation with University of California, Los Angeles, Fowler Museum, and the Los Angeles County Natural History Museum, indicated that no cultural resources have been previously recorded within the Project Area. However, two resources were documented outside the Project Area and within 0.5 mile search radius. The two recorded resources were identified as archeological, one historic and one prehistoric. The assessment reported for the potential for intact subsurface cultural resources as low due to the absence of known cultural resources and sacred sites within the Project Area and due to the insufficient information on known cultural resources in the surrounding vicinity.

Mitigation Measures:

CUL-2 - In compliance with Section 5097.98 of the Public Resources Code and Section 7050.5 of the California Health and Safety Code, if human remains are encountered, all ground disturbing activities shall be immediately suspended within 100 feet of the discovery, and the Los Angeles County Coroner should be notified immediately. If the Coroner determines the remains are Native American in origin, they must notify the Native American Heritage Commission within 24 hours of such identification so that the Native American Heritage Commission can contact the Most Likely Descendant (MLD). The MLD shall be provided access to the discovery and will provide recommendations for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements set forth in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code and CEQA Guidelines Section 15064.5.

3.18 Mandatory Findings of Significance

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				X
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)?				X
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

Discussion:

This project will be implemented along the roadway an in a public and highly urbanized area and therefore it is not anticipated to affect the quality of the environment, habitat, fish, wildlife, and plant populations.

4. References

ATS Consulting, 2018 “Construction Noise and Vibration Assessment”

California Department of Conservation. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/

California Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

Cogstone Resources Management, Inc., 2018 “Cultural Resources Assessment for the Washington Boulevard Stormwater and Urban Runoff Diversion Project, City of Culver City, Los Angeles County, California”

County of Los Angeles Department of Public Works (LACDPW). Los Angeles County Flood Control District Enhanced Watershed Management Programs, Program Environmental Impact Report, January, 2015

Culver City Zoning, Planning Division., revised 2005 https://www.culvercity.org/home/showdocument?id=142

United States Fish and Wildlife Service. National Wetlands Inventory. Wetlands Mapper. https://www.fws.gov/wetlands/Data/Mapper.html