ADDENDUM TO THE SUSTAINABLE WATER INFRASTRUCTURE PROJECT (SWIP) 
MITIGATED NEGATIVE DECLARATION 
October 2018

CITY OF SANTA MONICA
PLANNING AND COMMUNITY DEVELOPMENT
1685 MAIN STREET
SANTA MONICA, CA 90401
INTRODUCTION

This document is the Addendum to the Sustainable Water Infrastructure Program (SWIP) Mitigated Negative Declaration [SCH #2016071056]. This Addendum has been prepared in accordance with the relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the State CEQA Guidelines as implemented by the City of Santa Monica. According to Section 15164(b) of the State CEQA Guidelines, an addendum to a previously adopted negative declaration is the appropriate environmental document in instances when only minor technical changes or additions are necessary, and none of the conditions described in Section 15162 calling for the preparation of a subsequent negative declaration have occurred.

Section 15162 states the circumstances for when a subsequent negative declaration is required:

1) Substantial changes are proposed in the project which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects

2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3) New information of substantial importance, including one or more significant effects not discussed in the previous negative declaration

As discussed in this addendum, the City proposes to revise SWIP Element 3, which includes the construction of two stormwater control and harvest tanks. Specifically, SWIP Tank #1 was originally proposed to be located at Memorial Park beneath the existing playfield. The City now proposes to revise the location of SWIP Tank #1 to beneath the existing Civic Center surface parking lot adjacent to SWIP Element 2 recycled treatment facility and to stormwater tank #2. For construction efficiency, both SWIP Tank #1 and SWIP Tank #2 may be designed and constructed as a single combined structure resulting in a 4.5-million gallon (MG) capacity tank.

Based on the analysis in this addendum, the proposed change in tank location would not result in new or substantially more severe significant environmental effects. None of the conditions listed in CEQA Guidelines Section 15162 would occur, such that a subsequent negative declaration would be required. As such, the addendum is the appropriate environmental document under CEQA. All mitigation measures identified in the previously adopted MND shall remain applicable.

This Addendum includes a description of the SWIP as it is currently proposed and a comparison of its impacts to those identified in the SWIP MND previously adopted by the City of Santa Monica in August 2016.

BACKGROUND

PROJECT LOCATION

Tank #1 and Tank #2 for the SWIP are currently proposed to be located under the existing Civic Center surface parking lot near the corner of Fourth Street and Pico Boulevard in the Civic Center Specific Plan area of the City of Santa Monica (see Figure 1). The Civic Center surface parking lot is bound by Fourth Street to the east, Main Street to the west, Pico Boulevard to the south and Civic Center Drive to the north. (see Figure 3).
SWIP MND

A Mitigated Negative Declaration was prepared for the SWIP in accordance with Section 15087 of the State CEQA Guidelines. The SWIP MND, adopted on September 27, 2016, analyzed the development of the SWIP, which included three key elements (see Figure 2). The various components of the SWIP that were analyzed in the SWIP MND are listed in Table 1.
FIGURE 1 - PROJECT LOCATION
Figure 2 – SWIP Map
FIGURE 3 – SWIP CIVIC CENTER LOCATION
Table 1 – SWIP Elements Analyzed in SWIP MND

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<th>Details</th>
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<tr>
<td><strong>Element 1</strong></td>
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<tr>
<td>• Installation of reverse osmosis (RO) and pretreatment unit at SMURFF</td>
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<tr>
<td>• Installation of solar panel arrays at SMURFF, Pico Kenter SMURFF pumping station, and City Parking Lot #1</td>
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<tr>
<td>• Installation of groundwater extraction well at existing Beach Maintenance Yard</td>
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<td><strong>Element 2</strong></td>
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<tr>
<td>• Installation of underground recycled water treatment facility beneath Civic Center parking lot</td>
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<td><strong>Element 3</strong></td>
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<tr>
<td>• Installation of underground stormwater tank (SWIP Tank #1) at Memorial Park</td>
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<tr>
<td>• Installation of underground stormwater tank (SWIP Tank #2) at Civic Center</td>
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The SWIP MND addressed the potential environmental effects of the SWIP in accordance with CEQA and CEQA Guidelines. Less than significant impacts or no impacts were found in all environmental issue areas, except for Biological Resources and Paleontological and Archaeological Resources. For these three issue areas, mitigation measures would reduce impacts to less than significant. On August 2016, the City Council certified the SWIP MND and adopted the necessary mitigation measures to implement and approve the SWIP.

**APPROVED SWIP ELEMENT 3: STORMWATER TANK 1**

The SWIP MND analyzed the environmental impacts of the SWIP, which included development of an underground stormwater tank (Tank #1) at Memorial Park at the intersection of 14th Street and Olympic Boulevard. Tank #1 was proposed to be constructed beneath Memorial Park’s existing playfield (adjacent to the City’s Colorado Maintenance Yard). As described in the SWIP MND, Tank #1 will be capable of harvesting up to 3.0 million gallons (MG) of stormwater from any single precipitation event from the Pico-Kenter sub-watershed tributary area within the City. As analyzed in the MND, after a storm event, the tank will slowly release its contents to the SWIP’s proposed downgradient Civic Center Tank (Tank #2) via the City’s existing storm drain system. Tank #1 will gradually release its contents into the source water feed to the proposed recycled water advanced treatment plant (SWIP Element 2).

Excavation will encompass an area of approximately 23,260 square feet, or 0.53 acre (assuming a 172-foot-diameter circular and sloped excavation, including a 10-foot pre-stress leeway). To the extent feasible, excavated soils will be managed onsite. It is estimated that approximately 17,800 cubic yards of soil may be exported.

Both Tank#1 and Tank#2 will be constructed entirely underground, utilizing either modular tanks or standard cast-in-place methods. Excavation depths for each tank will be approximately 20 to 30 feet, and will employ engineered shoring, or be sloped to accommodate safe and efficient construction. Due to the underground construction design, a portion of the excavated soils will be used to backfill around and over the tanks. To the extent feasible, excavated soils will be managed onsite. Non-hazardous excess soils will be exported for reuse to the City Maintenance Yard. Soils requiring offsite disposal shall be transported and managed pursuant to applicable laws and regulations.
Currently Proposed SWIP Element 3: Stormwater Tank 1

In general, SWIP Tank #1 would be consistent with what was analyzed in the SWIP MND. Tank #1 would be the same size and serve the same functions as analyzed. However, the City proposes to locate Tank #1 to the Civic Center surface parking lot, adjacent to the proposed recycled water advanced treatment facility and to the south of the future Early Childhood Education Center (which is currently under construction). Locating Tank #1 to beneath the Civic Center surface parking lot would not directly impact the historic Civic Auditorium and would not remove any landscape elements of the Civic Auditorium. Tank#1 will be connected to the City’s existing storm drain system and the recycled water treatment plant included under Element 2 by a diversion structure and pumping station constructed beneath City property.

Consistent with what was described and analyzed in the SWIP MND, Tank #1 will be capable of harvesting up to 3.0 MG of stormwater from any single precipitation event from the Pico-Kenter sub-watershed tributary area within the City. Excavation will encompass an area of approximately 23,260 square feet, or 0.53 acre (assuming a 172-foot-diameter circular and sloped excavation, including a 10-foot pre-stress leeway). To the extent feasible, excavated soils will be managed onsite. It is estimated that approximately 17,800 cubic yards of soil may be exported. For construction efficiency, both Tank#1 and Tank#2 may be designed and constructed as a single combined structure resulting in a 4.5-MG capacity tank. Construction of the SWIP elements at the Civic Center surface parking lot would be coordinated with the construction of the future Civic Center Sportsfield (approved in 2018).
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<tr>
<td><strong>Location</strong></td>
<td>Memorial Park (beneath existing playfield)</td>
<td>Civic Center (beneath surface parking lot adjacent to proposed recycled water treatment plant)</td>
</tr>
<tr>
<td><strong>Size</strong></td>
<td>3.0 MG</td>
<td>3.0 MG</td>
</tr>
<tr>
<td><strong>Functions</strong></td>
<td>Harvest stormwater from a single precipitation event from the Pico-Kenter sub-watershed tributary area</td>
<td>Harvest stormwater from a single precipitation event from the Pico-Kenter sub-watershed tributary area.</td>
</tr>
<tr>
<td><strong>Relationship to SWIP Elements</strong></td>
<td>Connection to recycled water treatment plant at Civic Center and</td>
<td>Connection to recycled water treatment plant at Civic Center; alternatively Tank #1 and Tank #2 could be combined as one large tank</td>
</tr>
<tr>
<td><strong>Excavation</strong></td>
<td>17,800 cubic yards</td>
<td>17,800 cubic yards</td>
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Figure 4 – Proposed SWIP Civic Center Site Plan

- Relocated Diversion Structure for Kenter Canyon Storm Drain located at Main St.
- RBMP51: Relocated 3 MG Tank
- RBMP52: 1.5 MG Tank
- SWIP - Advanced Water Treatment Plant
- Proposed Pico Storm Drain Diversion Structure at Pico Blvd.
REGULATORY AUTHORITY FOR ADDENDUM

CEQA and the CEQA Guidelines establish the type of environmental documentation which is required when changes to a project occur after an EIR is certified. Section 15164(a) states that:

“The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred”.

Section 15162 of the CEQA Guidelines requires a Subsequent EIR where an EIR has already been prepared under the following circumstances:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

   a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration,

   b. Significant effects previously examined will be substantially more severe than shown in the previous EIR,

   c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative, or

   d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The purpose of this Addendum is to address whether the proposed changes to Tank #1 of the SWIP could result in any new significant environmental impacts which were not identified in the SWIP MND or whether previously identified significant impacts would be substantially more severe. As indicated in the analysis provided herein, the proposed stormwater tank relocation to the Civic Center surface parking lot would not constitute a substantial change in the SWIP that will involve “new significant environmental effects or a substantial increase in the severity of previously identified significant effects”. The environmental impacts associated with relocation of SWIP Tank #1 to the Civic Center surface parking lot would be consistent with those identified in the SWIP MND and/or do not constitute a new or greater significant impact.
On the basis of substantial evidence in the light of the whole record, the City has determined that an Addendum is the appropriate form of CEQA documentation to address the proposed changes to the SWIP’s Tank #1.

ENVIRONMENTAL IMPACT ANALYSIS OF THE REVISED SWIP - TANK #1

The following discussion analyzes the environmental impacts of the proposed changes to the SWIP (namely, the relocation of Tank #1 to the Civic Center) and compares the impacts to those identified in the SWIP MND:

AESTHETICS

The SWIP MND analyzed potential aesthetic impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that such impacts would be less than significant. Page 17 of the SWIP MND states the following:

“The only above-grade features of the project include the modular RO units proposed at the SMURRF (Element 1), a small wellhead structure and well protection posts at the existing Beach Maintenance Yard, and a section of piping associated with the proposed groundwater extraction well. These features will not be visible from PCH, due to existing intervening obstruction between PCH and the SMURFF [i.e., Moomat Ahiko Way, McClure Tunnel], existing vegetation and fencing around the SMURFF, and elevation difference. Thus, the project will have no permanent impact to scenic highways or scenic resources...

As discussed above, the proposed project will be predominantly underground. Therefore, the project elements will not create new sources of light or glare in the project area. Similarly, they will not produce shadows that could affect adjacent uses.”

Construction of the underground stormwater tanks would not result in impacts related to scenic vistas, scenic resources, visual character, light/glare, and shadows since they would be underground and not be visible. Therefore, changing the location of underground Tank #1 to the Civic Center parking lot would not result in aesthetic effects that would be greater than those identified in the SWIP MND. Aesthetic impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.

AGRICULTURE AND FORESTRY RESOURCES

The SWIP MND analyzed the potential impacts on agriculture and forestry resources that could occur as a result of the SWIP, including construction of Tank #1, and determined that no impacts would occur. As stated on page 20 of the SWIP MND:

“No existing agricultural land, forest land, or timberland zoning is present on the SWIP sites, including the existing SMURFF, Beach Maintenance Yard, the Civic Center Center Parking lot, Memorial Park, or near the project vicinity.”

Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts on agriculture and forestry resources that would be greater than those identified in the SWIP MND. No impacts would occur, consistent with the SWIP MND.
AIR QUALITY

The SWIP MND analyzed potential air quality impacts that could occur as a result of the SWIP, including those associated with Tank #1, and determined that impacts would be less than significant.

Construction

The SWIP’s construction-related air quality impacts were calculated based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment used during construction. Page 24 of the SWIP MND states the following:

“Table 3 summarizes the estimated annual emissions of pollutants during construction; as shown, project emissions would not exceed SCAQMD construction thresholds or Local Significance Thresholds for SRA-2.”

There are no proposed changes to the size or excavation for Tank #1. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in new construction pollutant emissions that would be greater than those identified in the SWIP MND. Rather, the emissions would be the same and would simply occur at the Civic Center surface parking lot. Construction air quality impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.

Operation

As stated on page 24 of the SWIP MND, operational air quality impacts of the SWIP (including Tank #1) would be less than significant:

“During operation of the SWIP, small amounts of emissions will be generated due to vehicle trips associated with new employees (one new full-time employee and up to two new part-time employees). These trips will be minimal, as the project will primarily be monitored remotely using smart technology and SCADA. Therefore, given the negligible amount of emissions, the project will not violate air quality standards or contribute substantially to an existing or projected air quality violation.”

There are no proposed changes to the size or functions of Tank #1 nor would there be any increases in anticipated number of employees. Operational air emissions and odors would not be greater than those identified in the SWIP MND. Operational air quality impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.

BIOLOGICAL RESOURCES

Sensitive Species, Habitat, Wetlands, US Waters, and Habitat Conservation Plans

The SWIP MND analyzed the SWIP’s potential impacts on sensitive species, sensitive habitat and natural communities, and wetlands/waters of the US and determined that no impacts would occur. As stated on pages 26-28 of the SWIP MND:

“The project site consists entirely of developed and landscaped areas located within an urban city setting. Project Element 1 will be constructed at an existing water recycling facility, Project Element 2 will be constructed under a paved parking lot, and Project
Element 3 will be constructed at an existing facility and under the maintained turf of a recreational park. Given the developed nature of the study area, habitat opportunities for sensitive species that occur in the region are limited. The presence of any sensitive or special status species is therefore unlikely. Mature ornamental trees and mowed grass/turf are the only vegetation types present within the non-paved portions of the study area...Based on the above, the proposed project would not result in impacts on sensitive species.....

No sensitive natural communities as defined by CDFW occur within the study area. Wetlands and waters regulated by U.S. Army Corps of Engineers and the Regional Water Quality Control Board under the Clean Water Act (§ 404 and 401, respectively) and CDFW under Fish and Game Code §1602, are absent from the proposed project work areas. No riparian habitat or other sensitive natural community is present at the project sites.”

The proposed relocation of Tank #1 to the Civic Center would not have greater impacts on sensitive species and habitats than those identified in the SWIP MND. There are no such resources present on the sites or surrounding area. The Civic Center parking lot was already analyzed as a project site – and as such, impacts would remain consistent with the SWIP MND. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts on sensitive species, habitats, and wetlands/US waters that would be greater than those identified in the SWIP MND. No impacts would occur, consistent with the SWIP MND.

Migratory Species

The SWIP MND analyzed the SWIP’s potential impacts on migratory species and determined impacts would be less than significant. As stated on page 28 of the SWIP MND:

“The Biological Resource Assessment...for the project identified ornamental trees surrounding and mowed grass/turf in portions of the study area, including mature trees situated around the SMURRF. These landscaped areas could provide potential roosting habitat for nesting birds and roosting bats. Tree removal is not proposed as part of the project, but equipment will be staged and working immediately adjacent to numerous mature trees. This could result in disturbance to potential adjacent bird nest or bat roost sites. Therefore, mitigation is required to reduce impacts to nesting birds and roosting bats to a less than significant level.”

The proposed relocation of Tank #1 from Memorial Park to the Civic Center parking lot would not result in impacts on migratory birds that would be greater than those identified in the SWIP MND. The Civic Center parking lot was already analyzed as a project site – therefore, impacts would remain consistent with the SWIP MND. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, trees at Memorial Park would not be affected. Impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND. As prescribed in the SWIP MND, mitigation measure MM BIO-1 remain applicable:

MM BIO-1 Nesting Birds and Roosting Bats Survey. A pre-construction survey for nesting birds and roosting bats shall occur prior to work during the nesting season (January 15 - August 31). These surveys shall be conducted by a qualified biologist within 14 days prior to the start of construction staging or ground disturbance and reinitiated as needed after periods of inactivity at each project site. If nesting birds or bats are found, a non-disturbance buffer zone shall be implemented with input from the qualified biologist. Buffer zones shall be clearly marked with exclusion fencing/staking and signage. Biological
monitoring shall be implemented if active nests or roosting bats are found to regularly assess their status and condition. Given the urban setting and the high baseline disturbance level, buffer zones can likely be focused to a limited area and, therefore, a specific distance is not provided. Nesting raptors (e.g., red-tailed hawk) typically warrant a larger zone than nesting passerines. If buffers are determined to be necessary (based on the survey), they can be adjusted based on work activities, monitoring results (e.g., reaction of the animals), and the biologist’s judgment. Buffers shall be maintained until work has ceased in the identified area or the birds/bats are done nesting/roosting, as confirmed by the biologist.

CONSTRUCTION EFFECTS

The SWIP MND analyzed potential construction impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that construction impacts would be less than significant with mitigation. Construction activities for Tank #1 would entail removal of the existing surface parking lot, grading/excavation of fill and dirt, and reconstruction of the Civic Center surface parking lot. The proposed relocation of Tank #1 to the Civic Center would not have greater construction effects (air, noise, and construction waste) than those identified in the SWIP MND. The size of the tank and excavation activities would be consistent with those analyzed in the SWIP MND. The Civic Center parking lot was already analyzed as a construction site—therefore, impacts would remain consistent with the SWIP MND. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, Memorial Park would not be affected.

Construction impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant with mitigation and impacts would be consistent with those identified in the SWIP MND. As described in the SWIP MND, mitigation measures have been identified for Biological Resources (Section IV) and Cultural Resources (Section VI).

CULTURAL RESOURCES

Historic

The SWIP MND analyzed potential cultural resources impacts that could occur as a result of the SWIP and determined that impacts would be less than significant. Page 4.4-28 of the SWIP MND states the following:

“The project sites are currently developed with the SMURRF, the City’s Beach Maintenance Yard, Civic Center parking lot, and the City’s Memorial Park. The nearest identified historic resources to the project is the Santa Monic Civic Auditorium, which is designated as a Santa Monica Landmark and the Santa Monica Looff Hippodrome building, which is a National Historic Landmark.

The proposed project will construct an underground recycled water treatment facility (Element 2) and an underground stormwater collection and storage tank in the Civic Center lot (Element 3). The underground footprint of the recycled water treatment plant and water tank will be approximately 375 feet northeast of the Civic Auditorium. The project will not involve any modifications to this landmark or any other historic resources in the vicinity. Additionally, the project’s installation of the modular RO unit in the existing SMURRF (Element 1) and the installation of an underground stormwater harvest tank at Memorial Park (Element 3) would not affect historic resources, since there are no historic resources in close proximity to any of these sites.”
The proposed changes to Tank #1 would not result in historic impacts that would be greater than those identified in the SWIP MND. Locating Tank #1 to beneath the Civic Center surface parking lot would not directly impact the historic Civic Auditorium and would not remove any landscape elements of the Civic Auditorium. Therefore, no impacts to historic resources would occur and, impacts on historic resources would be consistent with those identified in the SWIP MND.

Archaeological Resources

The SWIP MND analyzed potential impacts to archaeological resources that could occur as a result of the SWIP and determined that impacts would be less than significant with mitigation. Page 32-33 of the SWIP MND states the following:

“Project construction will involve excavation for underground water treatment and storage facilities in areas (Civic Center Parking Lot and Memorial Park) that could potentially contain subsurface archaeological remains (e.g., artifact-rich middens). Excavation associated with the proposed underground recycled water treatment facility, and underground stormwater harvest tanks, has the potential to encounter buried archaeological deposits. Therefore, a mitigation measure is proposed to ensure that any discovered resources shall be protected and curated if encountered during project construction. Accordingly, this impact will be less than significant.

The proposed changes to Tank #1 would not result in impacts on archaeological resources that would be greater than those identified in the SWIP MND. The size of the tank and amount of excavation would remain consistent with that analyzed in the SWIP MND. The SWIP MND had analyzed potential impacts associated with the SWIP’s excavation activities at the Civic Center parking lot – therefore, no new or worsened impacts would occur. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, the potential to encounter archaeological resources at Memorial Park would not occur.

Archaeological impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant with mitigation and would be consistent with those identified in the SWIP MND. As prescribed in the SWIP MND, mitigation measure MM CR-1 remain applicable:

**MM CR-1 Inadvertent Discovery of Archaeological Resources:** In the event of an inadvertent discovery of prehistoric or historic-period archaeological resources during construction, the applicant shall immediately cease all work within 50 feet of the discovery. The applicant shall immediately notify the City of Santa Monica Planning and Community Development Department and shall retain a Registered Professional Archaeologist (RPA) to evaluate the significance of the discovery prior to resuming any activities that could impact the site/discovery. This investigation shall be driven by a Treatment Plan that sets forth explicit criteria for evaluating the significance of resources discovered during construction and identifies appropriate data recovery methods and procedures to mitigate project effects on significant resources. The Treatment Plan shall be prepared by an RPA familiar with both historical resources and prehistoric archaeological resources prior to further excavation or site investigation following initial discovery. The Treatment Plan shall also provide for a final technical report on all cultural resource studies and for the curation of artifacts and other recovered remains at a qualified curation facility, to be funded by the applicant. If the archaeologist determines that the find may qualify for listing in the California Register, the site shall be avoided or a data recovery plan shall be developed. Any required testing or data recovery shall be directed by an RPA prior to resuming construction activities in the affected area. Work shall not resume until authorization is received from the City.
Paleontological Resources

The SWIP MND analyzed potential impacts to paleontological resources that could occur as a result of the SWIP and determined that impacts would be less than significant with mitigation. Page 33 of the SWIP MND states the following:

“Excavations associated with construction of the proposed project’s subterranean elements could potentially impact such resources. Mitigation is necessary to ensure that resources discovered during project construction will be appropriately protected and curated.”

The proposed changes to Tank #1 would not result in impacts on paleontological resources that would be greater than those identified in the SWIP MND. The size of the tank and excavation activities would remain consistent with that analyzed in the SWIP MND. The SWIP MND had analyzed potential impacts associated with the SWIP’s excavation activities at the Civic Center parking lot – therefore, no new or worsened impacts would occur. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, the potential to encounter resources at Memorial Park would not occur. Paleontological impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant with mitigation and would be consistent with those impacts identified in the SWIP MND. As prescribed in the SWIP MND, mitigation measure MM CR-2 remain applicable:

MM CR-2 Inadvertent Discovery of Paleontological Resources: In the event that a paleontological resource is discovered during ground-disturbing activities associated with the project, work will immediately cease within 50 feet of the discovery and the find shall be assessed by a qualified paleontologist for scientific significance and collected for curation, if necessary. If significant resources are encountered, curation will occur according to accepted standards as recommended by the Paleontologist in consultation with City staff.

Human Remains

The SWIP MND analyzed potential impacts to archaeological resources that could occur as a result of the SWIP and determined that impacts would be less than significant with mitigation. Page 33 of the SWIP MND states the following:

“Human remains have not been identified in the project vicinity; however, human remains could be preserved at depth beneath the existing onsite building and surface parking lot, and the possibility exists that such remains could be uncovered during construction of the proposed project….Compliance with existing regulations prescribed in California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, will ensure that impacts to human remains will be less than significant”

The proposed changes to Tank #1 would not result in impacts on human remains that would be greater than those identified in the SWIP MND. The size of the tank and excavation activities would be consistent with what was analyzed in the SWIP MND. The SWIP MND had analyzed potential impacts associated with the SWIP’s excavation activities at the Civic Center parking lot – therefore, no new or worsened impacts would occur. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, the potential to encounter human remains at Memorial Park would not occur. Therefore, impacts to human remains associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.
GEOLGY AND SOILS

The SWIP MND analyzed potential geology/soils impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant.

Geological/soils impacts are typically site-specific, and are determined partly by the specific characteristics of the underlying soils and geological setting.

Fault Rupture

The SWIP MND analyzed the SWIP’s potential impacts that could occur as a result of fault rupture and determined that impacts would be less than significant. Page 36 of the SWIP MND states the following with regard to fault zones:

“The project sites are not located in these zones as the closest site, Memorial Park, is approximately 2,500 feet south of the south branch and 7,000 feet south of the north branch. Additionally, no other known active or potentially active faults underlie the project sites. As such, the potential for fault rupture to occur at the project site is low. Therefore, impacts related to fault rupture will be less than significant.”

The proposed changes to Tank #1 would not result in fault rupture-related impacts that would be greater than those identified in the SWIP MND. The SWIP MND had analyzed potential fault rupture risks at the Civic Center parking lot – no active faults run beneath this site. Therefore, relocation of Tank #1 to the Civic Center parking lot would not have an effect on fault rupture risk. Therefore, impacts would be less than significant and, impacts would be consistent with those identified in the SWIP MND.

Seismic Groundshaking, Liquefaction, Landslides, Erosion, Unstable Geological Unit/Soils, Expansive Soils

The SWIP MND analyzed the SWIP’s potential impacts that could occur as a result of seismic groundshaking, liquefaction, landslides, erosion, unstable soils, and expansive soils and determined that impacts would be less than significant. Page 36 of the SWIP MND states the following with regard to these issues:

“The proposed project consists of sustainable water infrastructure that will be largely below the ground surface and will not expose people or structures to potential adverse effects such as risk of loss, injury or death involving seismic ground shaking. Therefore, impacts associated with ground shaking will be less than significant.”

“The project sites at the SMURRF, Civic Center Parking Lot, and Memorial Park are not identified as having soils susceptible to liquefaction. However, Parking Lot #1-South and the Beach Maintenance Yard are identified as having soils susceptible liquefaction along the coastline. The proposed solar panel parking shade at the Parking Lot #1-South and the shallow groundwater extraction well at the Beach Maintenance Yard would not expose people or structures to liquefaction or exacerbate existing liquefaction risks. Therefore, implementation of the project will not expose structures or people to potential adverse effects involving liquefaction. Impacts will be less than significant.”

“The project will construct a shallow groundwater extraction well on the Beach Maintenance Yard site; these features will not cause a landslide to occur, but may be inundated in the unlikely event that the bluff on the other side of the PCH from the site fails.
and a landslide event does occur. Implementation of the project will not expose people or structures to potentially adverse effects involving landslides."

The proposed changes to Tank #1 would not result in groundshaking, liquefaction, or landslide impacts that would be greater than those identified in the SWIP MND. The SWIP MND had analyzed these potential risks at the Civic Center parking lot and determined that impacts would be less than significant since the SWIP would not expose people or structures to potential adverse effects related to groundshaking, liquefaction, or landslides. Therefore, relocation of Tank #1 to the Civic Center parking lot would not have an effect on geological hazards. Therefore, impacts would be less than significant and, impacts would be consistent with those identified in the SWIP MND.

**Septic Tanks/Alternative wastewater Systems**

The SWIP MND analyzed potential impacts related to septic tanks/alternative wastewater systems that could occur as a result of the SWIP, including construction of Tank #1, and determined that no impacts would occur. Page 38 of the SWIP MND states the following:

> "The proposed project will not involve the installation of septic tanks or other wastewater disposal systems."

The proposed relocation of Tank #1 to the Civic Center would not have greater impacts related to septic tanks/alternative wastewater systems than those identified in the SWIP MND. As stated in the MND, the SWIP would not install septic tanks or alternative wastewater systems. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts related to septic tanks/alternative wastewater systems. No impacts would occur, consistent with the SWIP MND.

**GREENHOUSE GAS EMISSIONS**

The SWIP MND analyzed potential greenhouse gas (GHG) impacts that could occur as a result of the SWIP, including those associated with Tank #1, and determined that impacts would be less than significant.

**Construction**

The SWIP’s construction-related GHG impacts were calculated based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment used during construction. Page 40 of the SWIP MND states the following:

> "Construction activities from mobile sources such as vehicles and machinery used to install the proposed project features. Emissions will also occur during project operations, but will be primarily limited to the use of trucks and vehicles to access project sites for inspections and repairs, as needed… Thus, construction of the proposed project would generate an estimated 12.4 metric tons CO2e per year. Therefore, impacts of construction related emissions would be less than significant."

There are no proposed changes to the size or excavation for Tank #1. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in new construction GHG emissions that would be greater than those identified in the SWIP MND. Rather, the emissions would be the same and would simply occur at the Civic Center surface parking lot. Construction GHG impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.
Operation

As stated on page 24 of the SWIP MND, operational GHG impacts of the SWIP (including Tank #1) would be less than significant:

“Operation and maintenance of the project will not introduce GHG emissions that are inconsistent with the existing environment, as the project’s minimal staff will be drawn from the local workforce, thereby avoiding the introduction of new commuters. Further, the project will reduce the City’s current reliance on imported water. For every 2.5 billion gallons of avoided imported water associated with water savings under the project, approximately 8.9 million kWh of energy use and 5.256 million kg GHG emissions will be avoided. Because the project will ultimately decrease energy expenditures associated with providing a sustainable water supply to the City, potential impacts associated with GHG emissions will ultimately be beneficial.”

There are no proposed changes to the size or functions of Tank #1 nor would there be any increases in anticipated number of employees. Operational GHG emissions would not be greater than those identified in the SWIP MND. Operational GHG impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.

HAZARDS AND HAZARDOUS MATERIALS

Hazardous Materials – Routine Use/Accidental Release

The SWIP MND analyzed potential impacts that could occur as a result of the use, transport, and accidental release of hazardous materials that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 43 of the SWIP MND states the following:

“During construction activities for the project, typical hazardous materials will be used at the site, including hydraulic fluids, paints/sealers, cleaning materials, and vehicle fuels. The use of these materials during project construction will be short-term in nature and will occur in accordance with standard construction practices, as well as with applicable federal, state, and local health and safety regulations. Construction activities will not create a new hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

Operation of these [project] facilities will not involve the routine transport, use, or disposal of unusual or large quantities of hazardous substances. Any hazardous materials used or generated through operation of these facilities will be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations.

Potential impacts associated with the transport, use, and storage of hazardous or potentially hazardous materials during construction and operation will be less than significant.

Potential impacts to human health associated with treated non-potable water reuse will be less than significant. The quality of water for reuse will be in compliance with CCR Title 22 and Title 17 as determined by LA County Department of Public Health through their
permitting process and their Guidelines for Alternate Water Sources: Indoor and Outdoor Non-Potable Uses.”

There are no proposed changes to the size, function, or excavation for Tank #1. Therefore, the proposed relocation of Tank #1 to the Civic Center surface parking lot would not result in new hazards/hazardous impacts that would be greater than those identified in the SWIP MND. Hazards/hazardous impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.

Hazardous Site Listing

The SWIP MND analyzed potential impacts related to the presence of a hazardous materials site that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 43 of the SWIP MND states the following:

“Review of the databases listed above found no listing of the project sites as hazardous sites due to accidental contamination/spills or handling of hazardous materials. The hazardous material site nearest to the project is an open remediation case for a LUST, approximately 200 feet southeast of the Civic Center Parking Lot (Element 2) across Pico Boulevard. Sampling at the LUST site indicates that contamination is stable and decreasing. Further, sampling at the LUST site indicates a southwest groundwater flow direction (Stratus Environmental Inc. 2016). Therefore, contamination will not migrate to the Civic Center Parking Lot. Impacts will be less than significant.”

The proposed changes to Tank #1 would not result in hazardous site impacts that would be greater than those identified in the SWIP MND. The SWIP MND had analyzed potential hazard risks at the Civic Center parking lot through a review of database listings— the site is not subject to risks due to a hazardous materials site listing either onsite or offsite. Therefore, the proposed relocation of Tank #1 to the Civic Center surface parking lot would not result in new hazards/hazardous impacts that would be greater than those identified in the SWIP MND. Hazards/hazardous impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.

Airport Hazards and Wildland Fires

The SWIP MND analyzed potential impacts related to airport hazards and wildland fires that could occur as a result of the SWIP, including construction of Tank #1, and determined that no impacts would occur. Page 44 of the SWIP MND states the following:

“The project will not involve placing people or structures in proximity to aircraft operations and no risks to life or property from airport operations will occur as a result of the project. Therefore, no impact will occur....

The project sites are not located adjacent to or intermixed with wildlands. As such, the proposed project will not subject people or structures to a substantial risk of loss, injury, or death as a result of exposure to wildland fires. Therefore, no impacts will occur.”

The proposed relocation of Tank #1 to the Civic Center would not have greater impacts related to airport hazards or wildland fires than those identified in the SWIP MND. As stated in the MND, the Civic Center parking lot is not located near an airport or near wildlands. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts related to airport hazards or wildland fires. No impacts would occur, consistent with the SWIP MND.
HYDROLOGY AND WATER QUALITY

The SWIP MND analyzed potential hydrology and water quality impacts that could occur as a result of the SWIP, including construction of Tank #1. The SWIP MND determined that impacts would be less than significant on pages 48-50.

The proposed changes to Tank #1 would not result in impacts on hydrology/water quality that would be greater than those identified in the SWIP MND. The size of the tank and excavation activities would be consistent with what was analyzed in the SWIP MND. The SWIP MND had analyzed potential impacts associated with the construction and operation of the SWIP at the Civic Center parking lot – therefore, no new or worsened impacts would occur. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, the potential for hydrology/water quality impacts (such as the temporary alteration of onsite drainage patterns) at Memorial Park would not occur. Hydrology/water quality impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and impacts would be consistent with those identified in the SWIP MND.

LAND USE AND PLANNING

The SWIP MND analyzed potential land use impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 51 of the SWIP MND states the following:

“The proposed project involves the construction of sustainable water infrastructure and facilities. All proposed components of the project would occur within existing City property, which is previously disturbed. Furthermore, the major elements of the project such as the recycled water treatment plant and underground stormwater harvest tanks would be located underground. By constructing the key project elements underground, the project areas will be allowed to be developed with future land uses. The proposed project will be compatible with existing adjacent land uses”

The proposed relocation of Tank #1 to the Civic Center would not have greater land use impacts than those identified in the SWIP MND. No changes to the size or function of the tank are proposed. Tank #1 would be installed underground adjacent to the SWIP’s proposed recycled water treatment plant. The Civic Center parking lot was already analyzed as a project site – therefore, land use impacts would remain consistent with the SWIP MND. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, potential land use impacts at Memorial Park would not occur (i.e., existing playfield would remain undisturbed). The SWIP with the currently proposed Tank #1 would be consistent with City land use goals and policies to reduce water demand. Land use impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and impacts would be consistent with those identified in the SWIP MND.

MINERAL RESOURCES

The SWIP MND analyzed potential impacts on agriculture and forestry resources that could occur as a result of the SWIP, including construction of Tank #1, and determined that no impacts would occur. Page 55 of the SWIP MND states the following:

“The proposed project will not occur in an area known to contain mineral resources. Given that the project sites are located in a highly urbanized area of the City and are developed as the SMURFF, Beach Maintenance Yard, Civic Center, and Memorial Park the potential for mineral resources to occur onsite is low. Therefore, the proposed project will not result...
in the loss of availability of a mineral resource or a mineral resource recovery site and no impacts will occur."

Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts on mineral resources that would be greater than those identified in the SWIP MND. No impacts would occur, consistent with the SWIP MND.

NEIGHBORHOOD EFFECTS

The SWIP MND analyzed potential neighborhood impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 56 of the SWIP states the following:

“The project sites are located within existing City property and are surrounded by existing commercial, institutional, recreational, and residential uses... The only above-ground project features will be located at the SMURRF, which is not in a residential neighborhood, and at the Civic Center parking lot, also not a residential neighborhood (at the Civic Center parking lot a low profile stairwell and elevator structure will be constructed to provide secure access to the underground recycled water treatment facility). All other project features will be installed underground and therefore will result in no long-term change to neighborhood character or effects. Construction and operation of the proposed project will not result in adverse effects on a residential neighborhood given the project site location.”

The proposed relocation of Tank #1 to the Civic Center would not have greater neighborhood effects than those identified in the SWIP MND. The Civic Center parking lot was already analyzed as a construction site — therefore, impacts would remain consistent with the SWIP MND. Furthermore, with relocation of Tank #1 to the Civic Center parking lot, Memorial Park would not be affected. Neighborhood impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and impacts would be consistent with those identified in the SWIP MND.

NOISE

Construction

The SWIP MND analyzed potential construction noise impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Pages 58-59 of the SWIP MND state the following:

“During project construction, maximum noise levels could reach as high as 83 dBA at the exterior of nearest commercial uses approximately 100 feet southeast of Element 2. The nearest residences are the apartments adjacent to the SMURRF; Element 1 at the SMURRF involves the installation of prefabricated modular RO units and will not require noise-intensive activities such as excavation. Regardless, maximum noise levels could reach as high as about 80 dBA at the exterior of the residences adjacent to the SMURRF. Therefore, construction activities for the proposed project will not generate noise levels that exceed the established exterior noise limit of 85 dBA in a commercial zone. Impacts associated with construction activities will be less than significant and no mitigation will be required.”

The proposed relocation of Tank #1 to the Civic Center parking lot would not result in construction noise impacts that would be greater than those analyzed in the SWIP MND. Rather, the proposed
changes to Tank #1 would result in less construction noise impacts since construction noise would not occur at Memorial Park. Construction noise impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.

Operation

The SWIP MND analyzed potential operational noise impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. As stated on page 24 of the SWIP MND, operational noise impacts of the SWIP (including Tank #1) would be less than significant:

“Operation of the project will generate minimal vehicle trips. The noise that is anticipated to occur from operation of the project will be nominal and consisting of vehicle-related mobile sources during inspection and repair activities. Underground components, which comprise the majority of project facilities, will not generate operational noise. Potential noises associated with the use of inspection and repair vehicles and equipment will be minimal and consistent with the existing environment.”

There are no proposed changes to the size or functions of Tank #1 nor would there be any increases in anticipated number of employees. Operational noise would not be greater than those identified in the SWIP MND. Operational noise impacts associated with the SWIP, including the proposed changes to Tank #1, would be less than significant and would be consistent with those identified in the SWIP MND.

Population and Housing

The SWIP MND analyzed potential population and housing impacts that could occur as a result of the SWIP and determined that no impacts would occur. Page 60 of the SWIP MND states the following:

“The proposed project will not include construction of any housing units, and will not directly or indirectly induce population growth.... No impact will occur.....The project sites are currently developed as the SMURFF, Beach Maintenance Yard, Civic Center, and Memorial Park. There are no existing housing units or residents on these sites. As such, the project will not displace existing housing units or people and will have no impact.”

The proposed changes to Tank #1 would not result in population/housing impacts, consistent with the SWIP MND. The proposed Tank #1 would be developed beneath the existing Civic Center surface parking lot and would not induce population growth or displace people or housing. Population and housing impacts associated with the SWIP, including the proposed changes to Tank #1, would not occur and would be consistent with the SWIP MND.

Public Services

Fire Protection, Police Protection, Schools

The SWIP MND analyzed potential fire, police, and school impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that no impacts would occur. Page 62 of the SWIP MND states the following:
“The project will result in a negligible demand for fire protection services since the facilities will be predominantly underground and unmanned. Expansion of existing SMFD facilities or personnel will not be necessary to accommodate demand associated with the proposed project.

During project operation, project infrastructure will be monitored largely remotely via smart technology and SCADA with minimal onsite staff support, and no substantial risk or unusual demand for SMPD services will be introduced. Further, the project will not result in an increase in population in the City. As a result, demand for police protection services will not increase and there will be no need for new or expanded SMPD facilities.

The proposed project will not introduce new residential structures or uses that will generate demand for school facilities, libraries, or other public facilities. Further, the construction of the project will not generate employment such that direct or indirect increases in demand for such facilities will result.”

The proposed relocation of Tank #1 to the Civic Center parking lot would not result in additional residential or daytime population that would generate increased demand for fire, police, and schools. Impacts associated with the SWIP, including the proposed changes to Tank #1, would not occur and would be consistent with the SWIP MND.

Parks

The SWIP MND analyzed potential impacts on parks that could occur due to the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 62 of the SWIP MND states the following:

“Element 3 of the proposed project includes the installation of a stormwater harvest tank located underground in the City’s Memorial Park. During construction of this tank, access to portions of the park will be temporarily restricted. Upon completion of construction, the stormwater harvesting tank at Memorial Park will be underground and the above surface area will be restored to recreational uses. Impacts to Memorial Park will be temporary and limited to the construction period. Therefore, impacts to parks will be less than significant.”

The proposed changes to Tank #1 would not result in impacts on parks that would be greater than those identified in the SWIP MND. Rather, with relocation of Tank #1 to the Civic Center parking lot, the temporary construction effects to Memorial Park would not occur. Park impacts associated with the SWIP, including the proposed changes to Tank #1, would not occur and would be less than those identified in the SWIP MND.

RECREATION

See above in discussion of “Parks”

TRANSPORTATION AND CIRCULATION

Street Network

The SWIP MND analyzed potential transportation/traffic impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 65 of the SWIP MND states the following:
“The proposed project will not generate a substantial amount of vehicle trips during project operation. Improvements to the SMURRF proposed in Element 1 of the project will not result in any net new increase in vehicle trips. The proposed recycled water treatment facility at the Civic Center Parking Lot in Element 2 will require about eight truck trips, two times per year for the removal of the processed solids for a total of 16 vehicle trips per year.

Other portions of the project are not anticipated to generate vehicle trips since they will include underground water storage facilities and a shallow groundwater extraction well. The project will not generate traffic on a regular basis. The minor increase in trips will have a negligible effect on the performance of the existing street network. The proposed project will not conflict with transportation plans, including the Los Angeles County Congestion Management Program. Impacts will be less than significant.”

The proposed changes to Tank #1 would not affect the trip generation that was analyzed in the SWIP MND since there is no proposed increased in size, function or use. Nor would there be any increases in anticipated number of employees. Trip generation would not be greater than those identified in the SWIP MND. Traffic impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.

Airport Traffic/Alternative Transportation

The SWIP MND analyzed potential airport traffic and alternative transportation impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would not occur. Page 65 and page 66 of the SWIP MND states the following:

“Due to its distance from the airport, the project elements are not located in an airport land use plan or airport limited (e.g., safety-restricted) area. In addition, the project elements are not in established flight paths for the Santa Monica Airport and will not construct any structures or features that could interfere with air traffic. Construction of the proposed project will involve the use of crane equipment; however, this will not affect air traffic patterns. Therefore, this project will have no impact.”

“The proposed project will not disrupt existing rail/bus service nor will it require the relocation of existing bus stops.”

The proposed relocation of Tank #1 to the Civic Center would not result in greater impacts related to airport traffic and alternative transportation than those identified in the SWIP MND. Tank #1 would be placed underground. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts related to airport traffic and alternative transportation. No impacts would occur, consistent with the SWIP MND.

Hazardous Design/Emergency Access

The SWIP MND analyzed potential hazardous design and emergency access impacts related to the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Page 65 of the SWIP MND states the following:

“The proposed project involves the construction of sustainable water infrastructure at several distinct sites, and will not include hazardous design features such as dead ends, sharp curves, or dangerous intersections. The project also will not include incompatible uses (e.g., farm equipment)."
“During project construction, there are no expected lane closures and emergency access will be maintained at all times. Construction of the recycled water treatment plant may require the temporary closure of one or two driveways at the Civic Center parking lot. In the event that temporary closure of a driveway is required, a secondary detour driveway will be provided to ensure that access to the parking lot will be maintained for the Civic Center uses. Further, the project will be reviewed by the SMFD and SMPD prior to issuance of building permit to ensure adequate access.”

The proposed relocation of Tank #1 to the Civic Center would not result in greater impacts related to hazardous design/emergency access than those identified in the SWIP MND. Tank #1 would be placed underground. Therefore, changing the location of Tank #1 to the Civic Center parking lot would not result in impacts related to hazardous design/emergency access. Impacts would be less than significant, consistent with the SWIP MND.

**Utilities and Service Systems**

The SWIP MND analyzed potential utilities and infrastructure impacts that could occur as a result of the SWIP, including construction of Tank #1, and determined that impacts would be less than significant. Pages 70-71 of the SWIP MND states the following:

“The proposed project will increase the City’s capacity to treat and reuse wastewater, stormwater, and brackish/saline groundwater, as well as reduce the City’s demand for environmentally costly imported water. As such, the project will not require construction of new or expanded water or wastewater treatment facilities beyond what is proposed as part of the SWIP. Impacts will be less than significant....

The proposed project involves construction of stormwater harvesting facilities (Element 3), including a 3.0-MG tank beneath Memorial Park and a 1.5-MG tank beneath the Civic Center Parking Lot. The Memorial Park tank will harvest stormwater from two storm drains, one beneath Santa Monica Boulevard and another from beneath Broadway, both with diversions at 15th Street. Currently, flows from these two storm drains are discharged at the Pico-Kenter Outfall into the Pacific Ocean. The 1.5-MG stormwater collection and holding tank will be constructed adjacent to the recycled water treatment facility proposed in Element 2 of this project. This tank will primarily harvest stormwater from the approximately a portion of the Pico-Kenter sub drainage tributary area and the 6.2-acre Civic Center parking lot to store for treatment at the proposed recycled water treatment facility. A secondary use for this tank will be to serve as a settling tank for stormwater collected from the Memorial Park harvesting tank. Water will be delivered from the Memorial Park tank to the proposed recycled water treatment facility through the City’s existing stormwater drainage facilities. Together, these harvesting tanks act as stormwater control measure BMPs. They also contribute to the Santa Monica Bay Jurisdictional Groups 2 and 3 EWMP compliance and help improve beach water quality at the Pico-Kenter outfall. The proposed project will not result in the need of new or expanded stormwater drainage facilities beyond what is proposed as part of the SWIP design....

A stated purpose of the SWIP is to reduce the City’s demand for imported water supplies and work towards water supply self-sufficiency. Through the treatment and reuse of wastewater, stormwater runoff, and brackish/saline water resources in the City, the proposed project will increase the availability of local water resources and help to reduce demand for imported water purchased from MWD. Therefore, implementation of the project will not require new or expanded entitlements and will ultimately have a beneficial impact to the available water supply for the City of Santa Monica. No impact will occur.”
The proposed relocation of Tank #1 would not result in additional water use, wastewater generation, or energy use greater than analyzed in the SWIP MND; there is no proposed increased in size, function or use. Tank #1 is still proposed to harvest stormwater from the Pico-Kenter drainage area, thus decreasing City wastewater generation and reducing City demand on potable water use. Utilities impacts associated with the SWIP, including the proposed changes to Tank #1 would be less than significant and would be consistent with those identified in the SWIP MND.

**Mandatory Findings of Significance**

The currently proposed SWIP Tank #1 would not substantially change the analysis presented in the SWIP MND or mandatory findings of significance that were adopted for the approved SWIP.

**Conclusion**

As demonstrated in this Addendum, the proposed changes to SWIP Tank #1 would not generate new significant environmental impacts or increase the severity of impacts identified in the adopted SWIP MND.