

CALIFORNIA COASTAL COMMISSION

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Filed: 9/18/01
49th Day: 11/6/01
180th Day: 3/17/02
Staff: PE-LB
Staff Report: 1/17/02
Hearing Date: 2/2-8/02
Commission Action:

STAFF REPORT: REGULAR CALENDAR**APPLICATION NUMBER:** 5-01-184**APPLICANT:** Department of Transportation (Caltrans)**AGENT:** Stephanie Reeder, Aziz Elattar, Ron Kosinski

PROJECT LOCATION: Lincoln Boulevard: west side between Loyola Marymount University (LMU) Drive (formerly Hughes Terrace) and Jefferson Boulevard; medians and east side between Jefferson Boulevard and Fiji Way; Westchester, Play Vista, and Palms Districts, City of Los Angeles; and Marina del Rey, Los Angeles County.

PROJECT DESCRIPTION: Second step of three-step process to expand Lincoln Boulevard to six to eight travel lanes between LMU Drive (Hughes Terrace) in Westchester and Fiji Way the Marina del Rey. Work in coastal zone includes (1) between Hughes Terrace and Teale Street widen Lincoln Boulevard to 4 lanes northbound and to 3 lanes southbound; fill up to approximately 8 feet, add medians and construct sidewalks on the east side of roadway; (2) Between Teale Street and Jefferson Boulevard, beginning 624 feet south of Jefferson Boulevard, widen Lincoln Boulevard to 3 lanes total in each direction, add sidewalk on eastern side of street; (3) Between Jefferson Boulevard and Ballona Creek, widen road 32 feet east (inland), restripe lanes to provide a total of three lanes in each direction, and add medians; (4) between Ballona Creek and Fiji Way (near Culver Boulevard) widen east side of road as much as 10 feet, restripe to 3 lanes in each direction, and add medians; (5) along entire project, re-stripe to three to four travel lanes each way; add gutters, drains, curbs, dikes and deceleration lanes near intersections. Total grading is 66,529 cubic yards. In that total, 59,289 cubic yards are fill; 7,232 c.y. are cut. 52,056 c.y. are import, 1,405 c.y. are export.

SUMMARY OF STAFF RECOMMENDATION:

Staff is recommending **DENIAL** of the request for approval to widen this segment of Lincoln Boulevard to up to eight lanes. Lincoln Boulevard is a four-lane highway that extends north from Westchester through a notch in the Ballona bluff to Venice and Santa Monica. In this area, Lincoln Boulevard is presently a four-lane road except at Jefferson Boulevard, where there is a double left turn lane (permit waiver 5-00-139W).

Between the Ballona bluffs and Fiji Way, Lincoln Boulevard extends through the historic Ballona wetlands, large areas of which have been drained, filled and seriously impacted by human activities. In 1991 the United States Army Corps of Engineers and the Department of Fish and Game agreed that there were 170.56 acres of wetlands still existing directly to the west of this road, and south of the Ballona channel (Area B Playa Vista). In 1991, the Commission agreed to permit fill of 6.9 acres of state wetlands west of Lincoln (3.7 acres of Corps Wetlands), and dredging of other adjacent wetlands to create a 26.1-acre "Freshwater Marsh" located directly west of Lincoln Boulevard and south of Jefferson Boulevard (5-91-463).¹

This road would not impact this newly constructed freshwater marsh or fill any existing wetland. This roadwork extends into areas that the Commission permitted to be filled and disturbed during construction of the Freshwater Marsh. The road is so close to the toe of the berm of the freshwater marsh that there is no room for any sidewalk or other pedestrian facility between the shoulder of the road and the berm. The present project does not provide adequate parkways, pedestrian walks or connection to the Freshwater Marsh. It would be possible to provide this if the project used narrower lanes or if it were widened to a six-lane road rather than an eight-lane road. Caltrans now indicates that it could provide refuges for pedestrians at intersections and a connection to the top of the marsh berm, which is about eight feet above the level of the road.

The road widening would convert Lincoln Boulevard in this area to an eight-lane super-major highway, which, as designed, could act as a barrier to pedestrians and bicyclists, and to the future residents of Playa Vista. While a north-south route can carry additional traffic, if Lincoln it is widened and managed as an ultra high-speed highway, the newly widened highway might reduce access from east to west. A road of this width and speed is a barrier for pedestrians and bicyclists unless measures are taken to improve access across the road. The reconstruction of a neighborhood arterial as a high speed super-major highway is not compatible with the four lane segments of Lincoln Boulevard that are located to the north, in Venice and Santa Monica, that are dominated by storefront commercial development and retains a community character that is compatible with pedestrians, including walk streets and small shops. While much of the commercial development along Lincoln in Marina del Rey, Venice and Santa Monica consists of minor shopping centers, supermarkets and mini-malls that have their own parking lots, a significant proportion of it is still served by on-street parallel parking, which requires slower traffic, and which also depend, on the preservation of on street parking to continue to exist. Caltrans proposes to taper the

¹ After the Commission acted, the Department of Fish and Game changed its estimate of the amount of wetlands in Area B Playa Vista from 120 acres to 171 acres. Some of the newly designated wetlands were located in the area subject to the Freshwater Marsh, which is adjacent to this project. The change increased the wetlands area disturbed by the Freshwater Marsh but did not change the amount of wetlands that were filled - the remaining newly designated wetlands (a degraded salt marsh) were dredged and reconfigured as a freshwater marsh. Please see Exhibit for an overlay showing fill of wetlands in this area for the freshwater marsh. The Commission reviewed a table at the time and indicated that 0.1 acres of the fill in the freshwater marsh project was attributable to widening Lincoln Boulevard.

width of the road so that the width of the road and the speeds of the vehicles would gradually diminish before it reached the bridge over Ballona channel. When the next segment is constructed, Caltrans plans to narrow the road before it reached Mindanao Way. The widened road also raises serious issues of functional, physical and visual compatibility with park and habitat areas that are being considered for the undeveloped portions of the Playa Vista property both east and west of Lincoln Boulevard.

The road does not provide adequate connections to existing mass transit facilities. Santa Monica Transit Line 3, a major bus line that connects the City of Santa Monica with the Airport, runs down Lincoln. There is not adequate space in the present design to provide sidewalks that are wide enough to accommodate high capacity bus stops. The Phase I Playa Vista project includes transit elements (internal jitneys to reduce internal automobile trips) and has at the behest of Caltrans contributed to the purchase of extra buses, yet the road, as now proposed, has no sidewalks, bicycle lanes or bus stops on its west side. It does include a four to eight foot unimproved shoulder, and Caltrans in response to this issue has offered to provide bus stops and pedestrian refuges along the west side of the highway.

The Department of Transportation project report indicates that this and a related project will result in an eight- to ten-lane road between LMU Drive and Fiji Way, and that other projects will provide additional width farther north in the future to accommodate traffic expected to be generated by growth. As such, this segment of road is part of a larger project, which Caltrans divided for funding reasons. In December, Caltrans submitted an application for a coastal development permit for widening Lincoln from Jefferson to Fiji Way and rebuilding a bridge. This second project does overlap with the present project—removing the taper or partial widening installed in this project, and resulting in an eight-lane road from LMU to Fiji way. The separation into two projects is confusing, but most of the work in this present project takes place south of Jefferson, and most of the work in the second, northerly project consists of doubling the width of the bridge over Ballona Creek and widening the approaches to the bridge both north and south of the bridge to eight lanes. For reasons inherent to its budgeting process, the project description of both projects includes work from just north of the Airport to Fiji Way, even though the work in some are includes only road repair.

The application for the second phase of the project (the bridge and widening the approaches) is not complete (5-01-450, Lincoln Boulevard widening from Jefferson to Fiji Way). Due to permit-streamlining act deadlines, the Commission cannot consider the two projects together, but under Section 15165 of the CEQA guidelines, it cannot approve the projects separately.² Caltrans representatives insist that each segment can function separately, and question whether both projects need to be heard at the

² Under CEQA section 15165, "Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the lead agency shall prepare a single project EIR for the ultimate project as described in section 15168. " The total undertaking comprising one project is all traffic mitigation measures/road expansion that Playa Vista Capital will undertake for Phase I, as approved by the City.

same hearing. Unless it considers both projects separately, the Commission cannot evaluate the combined impacts of the projects, or the feasibility of possible changes that could improve the project's consistency with the Coastal Act. The staff is recommending denial of the project until the Commission can consider both road-widening efforts together. The applicant insists that this proposed phase has benefits on its own, that approval of this phase would not commit the commission to approve the bridge project, and that each phase can function separately. This is true, if the Commission will accept the location of each of the roads as given, and does not determine that it is necessary leave the option of relocating the widening to the east, farther from the freshwater marsh and the wetlands in Area B, or if it does not want to consider changing the number of lanes.

As Caltrans points out in its application, there are planning processes underway that would examine the future traffic improvements as well as the view protection needs of the Lincoln Corridor. Los Angeles City and County, Culver City and Santa Monica have formed a task force to investigate traffic improvements and design alternatives for the Lincoln Corridor cooperatively. These elements include transit alternatives, design alternatives visual quality as well as coordinated traffic improvements. Another issue that is to be addressed in this cooperative effort is the enhancement of views along and from Lincoln Boulevard. While it is unrealistic to halt development pending a planning program that is not moving quickly, it is realistic to assure that the elements required to be investigated by the task force are also incorporated into this review as Lincoln Boulevard is widened. **The motion is found on page 7**

STAFF NOTES:

A. LOCALLY ISSUED PERMITS UNDER 30600(b). The City of Los Angeles has assumed the responsibility of issuing coastal development permits within its boundaries as permitted in Section 30600(b) of the Coastal Act, which allows local governments to review and issue coastal development permits prior to certification of a Local Coastal Program (LCP). Section 30600(b), however, provides that local governments do not have jurisdiction to issue coastal development permits under this program to public agencies over which they do not normally have permitting authority, such as schools and state agencies. Therefore, unlike many other projects that the Commission has reviewed in the City, this project has not received a coastal development permit from the City of Los Angeles.

Section 30600 states in part:

Section 30600

(a) Except as provided in subdivision (e), and in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, any person, as defined in Section 21066, wishing to perform or undertake any development in the coastal zone, other than a facility subject to Section 25500, shall obtain a coastal development permit.

(b) (1) Prior to certification of its local coastal program, a local government may, with respect to any development within its area of jurisdiction in the coastal zone and consistent with the provisions of Sections 30604, 30620, and 30620.5, establish procedures for the filing, processing, review, modification, approval, or denial of a coastal development permit. Those procedures may be incorporated and made a part of the procedures relating to any other appropriate land use development permit issued by the local government.

(2) A coastal development permit from a local government shall not be required by this subdivision for any development on tidelands, submerged lands, or on public trust lands, whether filled or unfilled, or for any development by a public agency for which a local government permit is not otherwise required. (Emphasis added)

The City of Los Angeles does not have permit jurisdiction over development carried out by the State Department of Transportation elsewhere in the City of Los Angeles. Therefore, the Department of Transportation has applied directly to the Commission for this coastal development permit for the development that is proposed inside the Coastal Zone.

B. Jurisdiction of Los Angeles County under its certified Local Coastal Program. There is a certified local coastal program for the Marina del Rey. After certification of a local coastal program, the local government of the area has jurisdiction over all development within the area of its certified LCP including development undertaken by state agencies. Section 30519 provides that:

Section 30519

(a) Except for appeals to the commission, as provided in Section 30603, after a local coastal program, or any portion thereof, has been certified and all implementing actions within the area affected have become effective, the development review authority provided for in Chapter 7 (commencing with Section 30600) shall no longer be exercised by the commission over any new development proposed within the area to which the certified local coastal program, or any portion thereof, applies and shall at that time be delegated to the local government that is implementing the local coastal program or any portion thereof.

(b) Subdivision (a) shall not apply to any development proposed or undertaken on any tidelands, submerged lands, or on public trust lands, whether filled or unfilled, lying within the coastal zone, nor shall it apply to any development proposed or undertaken within ports covered by Chapter 8 (commencing with Section 30700) or within any state university or college within the coastal zone; however, this section shall apply to any development proposed or undertaken by a port or harbor district or authority on lands or waters granted by the Legislature to a local government whose certified local coastal program includes the specific development plans for such district or authority.

The reason that the local government has jurisdiction over a project proposed by a state agency is that in adopting and implementing its LCP, the local government is implementing a state law. The boundary between in the City and County in the Marina del Rey/Playa Vista area is the inland boundary of the Lincoln Boulevard right-of-way. There are two segments of Lincoln Boulevard in this area that are in the County jurisdiction—the Marina del Rey segment, which is certified, and the Playa Vista Area A segment, which is not. The Commission effectively certified Los Angeles County's Local Coastal Program for Marina del Rey in December 1990. The certified Marina del Rey segment extends northward from the southern edge of the Fiji Way right-of-way and extends past Bali Way to the City of Los Angeles/Los Angeles County boundary at the inland side of the old Pacific Electric right-of-way. This segment includes the entire width of Lincoln Boulevard that is adjacent to it. A coastal development permit is needed from Los Angeles County for any development on Lincoln Boulevard in this area that requires a coastal development permit.

In this case, the work that is proposed in the certified segment of the Marina del Rey consists of intersection improvements, repair of the road surface and installation of a raised median strip at the intersection of Mindanao and Lincoln. The actual work planned in this section of road does not include any road widening, and may be exempt under a categorical exclusion, unless the number of lanes will change. The categorical exclusion is entitled: "Repair, Maintenance and Utility Hook-up Exclusions from Permit Requirements." It was approved by the Commission on September 5, 1978 and subsequently incorporated into the certified Los Angeles County LCP (Section 22.56.2290(4) of the County Code.) The categorical exclusion specifically exempts "installation of or expansion of retaining walls safety barriers and railings and other comparable development within the existing right-of way as specified below." Since the Los Angeles County now has coastal permit jurisdiction, Caltrans approached the County to determine whether the proposed work is covered under the categorical exclusion. The County has determined that the proposed work on the median is excluded from permit requirements.

The portions of Lincoln Boulevard that are located in the Los Angeles County Playa Vista Area A are not located in a certified area. Area A extends from the southerly side of the Fiji Way right-of-way southward, to the southerly edge of Ballona Creek bank, and includes the entire width of Lincoln Boulevard. Because certification of this segment is deferred, the Commission retains jurisdiction over the part of Lincoln Boulevard that is located in Playa Vista Area A.

APPROVALS RECEIVED:

1. Categorical Exemption CEQA, Caltrans

I. MOTION, STAFF RECOMMENDATION AND RESOLUTION

Staff recommends that the Commission deny the permit, and make the following motion and adopt the following resolution.

MOTION: *I move that the Commission approve Coastal Development Permit No. 5-01-184 for the development proposed by the applicant.*

STAFF RECOMMENDATION OF DENIAL:

Staff recommends a **NO** vote. Failure of this motion will result in **DENIAL** of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO DENY THE PERMIT:

The Commission hereby **DENIES** a coastal development permit for the proposed development on the ground that the development would not conform with the policies of Chapter 3 of the Coastal Act, and approval would prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit would not comply with the California Environmental Quality Act because there are feasible mitigation measures or alternatives that would substantially lessen the significant adverse impacts of the development on the environment.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND LOCATION

This is part of a three-part program, two of which are Caltrans projects, to widen Lincoln Boulevard to accommodate both existing and expected growth. Lincoln Boulevard is part of Pacific Coast Highway (California Route One), linking Malibu and Route 10 with the Airport and then, as Sepulveda Boulevard, with the South Bay cities. Lincoln Boulevard has traditionally been a four to six-lane major highway, except adjacent to the Marina del Rey where it is now widened to eight lanes near the end of the Route 90/Marina Expressway. Lincoln is the westernmost major north-south route in the Venice/Santa Monica/West Los Angeles area. There is only one continuous north-south route west of Lincoln Boulevard. Formerly, Pacific Ave and Speedway extended from Santa Monica to Playa del Rey, but the construction of the Marina del Rey permanently interrupted this route. Santa Monica Airport and the Santa Monica hills interrupt Centinela connects to Bundy, which extends as far north as Sunset, but

through much of its route, a significant number of dwelling units would be displaced if the City engaged in major widening north of Ballona Creek. Playa Vista is already required to make some improvements to Centinela (Exhibit 17). Because of the absence of another continuous route, Lincoln Boulevard has been very heavily used as growth has occurred.

The two-stage project would widen portions of Lincoln Boulevard from LMU Drive (formerly Hughes Terrace) to Fiji Way, to eight lanes. From LMU Drive to Culver Boulevard, the widening is a required mitigation measure in the EIR for the First Phase Playa Vista project. Irrespective of the impact expected from these projects, numerous other projects over the years have increased traffic levels on Lincoln Boulevard, which is now at level of service (LOS) F (stop and go) during evening and morning peak hours at certain key intersections.

The present project consists of the following development:

Work in coastal zone, as described by Caltrans, includes:

- (1) Lincoln Boulevard between LMU Drive and Jefferson Boulevard; expand right of way west between 65 and 75 feet; widen to eight lanes; fill up to 8 feet to raise grade, add medians at Lincoln and Jefferson, realign intersection at Teale Street, install turn pockets, and sidewalk on east (inland) side of street;
- (2) Lincoln Boulevard between Jefferson Boulevard and Ballona Creek move edge of paved roadway 32 feet east (inland), re-stripe lanes to accommodate no more than three lanes each way,
- (3) Lincoln Boulevard between Culver Boulevard and Fiji Way (near Culver Boulevard) expand paved roadways east about 10 feet;
- (4) Along entire project, re-stripe to three and four travel lanes each way; construct sidewalk on east side of roadway north of Jefferson, add gutters, drains, and deceleration lanes near intersections (and resurfacing, which is categorically excluded). Total grading is 66,529 cubic yards. In that total 59,289 cubic yards are fill; 7,232 c.y. are cut. 52,056 c.y. are import, 1,405 c.y. are export.³

The fill would be located adjacent to the Playa Vista Freshwater Marsh where the elevation of the roadway would be raised on fill, and where, near Teale Street, the road would be relocated eastward. The three-stage widening project will create a six to eight-lane highway within a ± 152 -foot wide right-of-way from LMU Drive to Fiji Way. North of Fiji Way other projects have added to the width of Lincoln Boulevard to accommodate their traffic.

³ Source: Application filled out by Caltrans staff. AS described in text, the work is not a continuous strip, but several jobs within the area described.

B. RELATED PROJECTS.

This is one of seven coastal zone road construction projects that are requirements of the First Phase Playa Vista EIR. The Commission has reviewed several, approved one and will be reviewing others in the future. There are three Caltrans projects:

1. This present project: Teale to Jefferson Boulevard project with minor widening as far north as Fiji Way. CDP 5-01-184.
2. Replace the four-lane Lincoln Boulevard Bridge over Ballona Creek with an eight-lane bridge; widen Lincoln Boulevard north of Jefferson Boulevard from four to eight lanes up to Fiji Way. Caltrans # 166051/61/710UI; CDP 5-01-450 (incomplete).
3. Design and contribute to the construction of a grade-separated interchange at the Marina Freeway and Culver Boulevard. CDP 5-01-038 withdrawn and resubmitted as 5-01-432 (also before the Commission at the present February, 2002, hearing).

In addition, there are four other major road widening or road extension projects in the Coastal Zone that the City has required the Playa Capital to complete as part of the first phase of Playa Vista traffic mitigation these include:

1. Construct a second loop ramp at Culver and Lincoln Boulevards to allow two-way traffic, widen Culver Boulevard to 72 feet (three lanes plus deceleration lanes,) construct ramps to Marina Freeway eastbound. CDP 5-01-382; A-5-PLV-00-400 (approved November, 2001).
2. Realign intersection at Culver and Jefferson Boulevards to a right-angled intersection instead of an acute angled intersection. CDP 5-01-223 A-5-PLV-01-281. Approved November 2001.
3. Extend Playa Vista Drive (formerly Bay Street) by bridge across Ballona Creek to Culver Boulevard. CDP 5-01-107 withdrawn pending investigation of alternatives; A-5-PLV-01-200 (incomplete).
4. Lincoln Boulevard: Additional turn lane, taper at Lincoln and Jefferson Boulevards. Caltrans # 1660UI; CDP 5-00-139W (completed).

Playa Vista has also carried out minor intersection and traffic improvements elsewhere, and will, in the near future, realign/increase the capacities of the intersections of Vista del Mar and Culver Boulevard and Nicholson and Culver Boulevard in Playa del Rey. The complete list of traffic improvements that the City has required Playa Vista to carry out to mitigate its first phase is provided in Exhibits 15 and 17.

Caltrans submitted a complete application for the present project months before the northern portion of the widening project was ready to submit, arguing that each project would be funded separately and could be developed and function independently. Section 13053(4) of Title 14 of the California Code of Regulations requires, in part:

"To the maximum extent feasible, functionally related developments to be performed by the same applicant shall be the subject of a single permit application."

Based on this regulation, the staff initially rejected the present application, pending the submittal of an application for the Ballona Creek Bridge and the related widening of Lincoln Boulevard to the north. Caltrans responded that due to state and local budgetary constraints, Caltrans normally phases projects over a number of budgetary years. The next "phase" of the project may occur within two or three years, but each phase of a project is designed to function independently without the completion of the next phase. They followed up with a letter in which they explained that this present project (5-01-184) is to be constructed from February 2002, to March 2003 and the Ballona Creek Bridge (SCH#200121126) would be constructed from March 2003 to March 2006. Caltrans representatives noted that traffic conditions change, which may change priorities. Finally they noted that the construction of projects have to be phased over a number of years to minimize the disruption of traffic due to construction. Staff then accepted the application.

This project is now approaching the end of the 90-day extension allowed by the permit streamlining act. While Caltrans has submitted a permit application for the adjoining segment of Lincoln Boulevard, on November 30, 2001, the request was not complete as of January 15, 2002. Materials submitted after that date could not be analyzed in time to prepare a report for the February, 2002 hearing.

As noted above the Commission has approved the Culver Boulevard loop ramp and widening project (CDP 5-01-382; A-5-PLV-00-400) and the Culver Jefferson interchange (CDP 5-01-223; A-5-PLV-01-281). Playa Capital has withdrawn the application to add a second bridge over Ballona Creek and extend Playa Vista Drive (formerly known as Bay Street) from Jefferson Boulevard to Culver Boulevard pending review of transportation alternatives.

C. DEVELOPMENT

The Coastal Act provides standards that the Commission must use in approving development. Section 30250 requires that development be sited and designed in existing developed areas to minimize development in relatively untouched rural areas. Section 30252 encourages investigations of other modes of travel to reduce competition for coastal access roads.

Section 30252.

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing

adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Based on these provisions of the Coastal Act, the Commission and City of Los Angeles have approved coastal development permits for high-density projects in the immediate area of the proposed project. These include projects adjacent to Lincoln Boulevard (also see above and the Substantive File documents). All these projects, along with projects outside that Coastal Zone, have individually and cumulatively, contributed to the increasing levels of traffic on Lincoln Boulevard, Washington Boulevard, Mindanao, Culver Boulevard and the Marina Freeway. (Most notably the Commission found no substantial issue raised by two City of Los Angeles-approved projects: one that included a 334 unit (moderate income) apartment building and a 166 unit building; the other included 800 (moderate income) apartments and two 16 story towers providing 512 condominiums on an 18.9 acre site. Both projects were located on Lincoln Boulevard. (See Substantive File documents above for the numbers of the two appeals.)) The Commission has approved LUP's with similar impacts, notably the Marina del Rey Ballona LUP in 1984. In 1987 the Commission reiterated its approval of the Marina del Rey/Ballona LUP's in applying to the City and County areas of the Marina del Rey and Playa Vista (Marina del Rey LUP 1987, Playa Vista LUP, 1987.) In 1995 the Commission approved an amended LCP for the Marina del Rey that would result in 2,712 daily peak hour trips and would include multi-story development on most residential parcels. In effect, the Commission's assumption has been that development and the concentrated infrastructure to serve it would be located in Los Angeles and not in more remote areas along the coast. All of these approvals presumed that the infrastructure serving Lincoln Boulevard including Lincoln, Culver, Jefferson, Washington and Venice Boulevards would require road improvements. (Exhibit 27.) The plan approvals were granted before the courts issued the 1999 Bolsa Chica decision, Bolsa Chica Land Trust v. Superior Court (1999) 71 Cal. App.4th 493.

Part of the thinking in approving higher density development in some areas is the theory that higher density development could support transit alternatives as required in Section 30252. In addition to allowing high-density development and providing lists of road improvements, the Marina del Rey Ballona LUP (1984) and its successors required the development of mass transit alternatives. LUP policies required that some form of transit be part of the transportation improvement package. The 1987 Marina del Rey LUP and the related Playa Vista LUP require (1) development of jitney systems integrated between the City areas, County areas, Playa del Rey and Venice, (2) development of park-and-ride lots for commuter express buses that would travel to Downtown Los Angeles, and (3) reservation of right-of-way along Lincoln Boulevard for a transit way. However, the transportation improvements that the Commission has actually reviewed to date concentrate on road widening. According to the applicant,

Playa Vista has recorded an offer to dedicate a transit right of way to the east of Lincoln Boulevard. There is no immediate program to develop use of the right of way, but it is available if it is needed in the future.

The mitigation measures for the First Phase EIR/EIS for Playa Vista do require internal transit, transportation management, and include methods to encourage residents to seek jobs in the project and to encourage commuting employees to use transit. Other transportation improvement methods that Playa Vista and the other large projects have been required to undertake include funding methods to increase the number of cars on existing streets by synchronizing signals in order to increase volumes and speeds. Playa Vista and the City have also required jitneys within Playa Vista. Transit under consideration by both Playa Vista and the Department of Beaches and Harbors consists of jitneys and other short haul buses, but few long haul improvements that might accommodate the ten to fifteen mile work trip that the average Los Angeles resident makes. Culver Boulevard is the site of a former railroad right-of-way that extends west and south through the wetlands and then south through the South Bay. There is no analysis in this proposal or in more recent plans of methods for using this older right-of-way for a dedicated transit way or other alternative transportation, even though the success of other high speed bus ways and light rails make it more likely that a transit way in this location would attract riders, because a ten to fifteen mile trip is feasible if there are connecting routes. There is no requirement that physical roadway improvements also include widening of bus and bicycle lanes.

In designing of this project, Caltrans has not addressed alternative transportation methods, as required in Section 30252 of the Coastal Act, and by the certified Land Use Plans for these areas. There is no space allocated for a bus lane along Lincoln Boulevard. The sidewalks are narrow and do not accommodate space for bus stops. There is no sidewalk proposed along the western side of Lincoln Boulevard. There is no designated bicycle lane, although, as noted above, there is presently no other continuous north-south route other than Lincoln Boulevard. In response to this issue, as noted above, Caltrans has offered to provide handicapped accessible sidewalk at intersections, and to provide connections to the freshwater marsh berm and to provide refuges for bus riders at bus stops.

Secondly, while a north-south route can carry additional traffic, if Lincoln it is widened and managed as an ultra high-speed highway, the newly widened highway might reduce access from east to west. A road of this width and speed is a barrier for pedestrians and bicyclists unless measures are taken to improve access across the road. Many coastal access routes cross Lincoln Boulevard. Bicycle clubs presently use Jefferson Boulevard as a route to the South Bay Bicycle Trail⁴. Mindanao is used as

⁴ The South Bay Bicycle Trail, operated by Los Angeles County, extends from the beach at Playa del Rey along the beaches to Torrance Beach, where it ends at the bluffs. A similar bicycle trail extends from Venice to the Pacific Palisades. There is a connection along Washington Boulevard and then through the Marina del Rey, but the only way across the Marina del Rey Entrance Channel is the bridge at Lincoln Boulevard. The bridge over the creek near the mouth of the entrance channel, does not cross the entrance channel.

the principal entrance to the Marina del Rey. Venice and Washington Boulevards, that are located north of the project area, are other important coastal access routes. In the approximately 1.5 mile stretch of this project that is located in the coastal zone, there are four places to cross Lincoln Boulevard at traffic signals and one place to cross under it along the creek bank (the Ballona Creek bike path). There are signalized intersections located at Fiji way, Mindanao Way, Jefferson Boulevard, and LMU Drive. It is not possible to cross at Culver Boulevard. The Ballona Creek Bike Path passes under the bridge at Ballona Creek and connects to the South Bay Bicycle Path. To the extent that widening of the road is coupled with synchronized high-speed signals, Lincoln Boulevard would become more forbidding to pedestrians. However, these technical innovations can also be used to improve public access. Traffic lights can, for example to be set to work differently at different times of the day or year. The width of roadway features could be adjusted to provide more space for pedestrians. For while there are few pedestrians at present, with the development of the first phase Playa Vista, more pedestrians would appear. Caltrans objects that 12-foot lanes are necessary to provide higher roadway speeds. However, just north of this project, in the marina del rely and Venice, the road provides only two travel lanes each way, plus turn pockets, and the lanes are between nine and ten feet wide. The commission understands that wider lanes are safer at higher speeds, but nearby cities limit speeds for safety reasons and make a more efficient, pedestrian oriented use of space. As proposed this section of Lincoln Boulevard would be an anomaly and would not provide the pedestrian amenities appropriate to high-density development.

There are methods to reduce the barrier function of the road for pedestrians and cyclists. These include (1) sidewalks (2) landscaping (3) wider sidewalks near bus stops and bus rest areas, (4) additional routes over under and across Lincoln boulevard for pedestrians (5) timing of signals so that they allow additional time to cross the road (6) adjusting signals outside of commuter time to favor turning and pedestrians (7) view turn outs. Some of these provisions are suggested in the project design of the second phase project of Playa Vista. However, Caltrans needs to consider methods of making this road compatible with either a full second phase or with eventual use of a significant portion of the area as a wildlife preserve and park.

As now planned the project is inconsistent with the provisions of the coastal act the require development to be integrated to provide non-automobile transportation. And is inconsistent with sections 30250 and 30253. As redesigned it would increase pressure for street widening in adjacent areas and would be incompatible with encouragement of transit alternatives.

D. PUBLIC SHORELINE ACCESS AND RECREATION

Section 30210 requires that maximum access to the coast be provided. Section 30212 requires that access to the coast shall be provided n new development (a major road is new development), Section 30223 requires the reservation of upland areas that are necessary to support coastal recreation, and section 30240(b) requires development adjacent to environmentally sensitive habitat areas ... and parks shall be compatible

with the continuance of those habitat and recreation areas. The project will allow increased speed and volume on a north/south traffic route that delivers beachgoers to the Venice and Playa del Rey beaches and to Marina del Rey and distributes visitors farther south into the South Bay.⁵ Although the project is designed to reduce congestion on Lincoln Boulevard during peak commuter hours, it can and will serve to improve vehicular access to the coast on weekends as well.

The land west of and adjacent to this roadway is being restored as a freshwater marsh. The land immediately north of Jefferson Boulevard and west of Lincoln Boulevard may be acquired and restored as wetland habitat. There is a conflict between Lincoln Boulevard's role as a high-speed super major highway and providing access to parks and views of the restored wetland.

Section 30240(b) requires that development and this road is development, adjacent to parks to prevent impacts which degrade these areas and to be compatible with the continuance of those habitat and recreation areas. A barrier that prevents access to such an area is not compatible with its continuance as a recreation area. A roadway directly adjacent to a habitat or park must function differently from a roadway that is essentially a barrier as are many urban freeways by allowing pedestrian access across and along the road, and by limiting lights, noise and other disturbances (see Exhibit 5).

This proposal does not include any foot trails or sidewalks on the west side of the road. The applicant argues that pedestrian access will be provided along the top of the wetland berm, suggesting that a way will be found to allow the public to get up the berm from street level (Exhibit 4). The applicant argues that sidewalks are local responsibilities, but the EIR that required Playa Vista to pay for this road showed sidewalks and bicycle lanes. The bus stops identified in the adopted Playa Vista Phase I mitigation and monitoring program do not appear in the final roadway plan. There are no identified turnouts where visitors can slow to observe the view. This road is as wide as the Long Beach Freeway between the 405 and Willow Avenue, but there is no discussion of measures to adjust timing of lights or otherwise provide pedestrian access across the road. The high speeds for which it is designed will work against its use as a view corridor. The absence of significant landscaping will result in a hot, visually oppressive appearance. As designed, this project does not provide access to the lands adjacent to it and does not provide a recreation support function (Exhibit 3).

In response to these issues, Caltrans has indicated that it will have a four to eight foot shoulder and that part of this shoulder can be paved to provide pedestrian refuges or bus stops. It can also provide a connection to the maintenance road that encircles the freshwater marsh, so that pedestrians can climb up onto the maintenance road, which would then function as a walkway (See Exhibit 4.)

Specifically Caltrans representatives state:

⁵ The South Bay comprises the Cities El Segundo, Manhattan Beach, Hermosa Beach and Redondo Beach and cities located directly inland of them such as Lynwood and Lomita. These cities are inland of Santa Monica Bay, which extends from Point Dume to the Palos Verdes Peninsula.

The Ballona Creek bike trail crosses beneath the Route 1 Project at Ballona Creek. The Project improvements will not adversely affect access to the bike trail. Although not a part of the Project itself and not within the Route 1 right-of-way, it should be noted that Playa Vista will be constructing an off-road bike path along the east side of Route 1 between Hughes Terrace and Bluff Creek Drive, from which point bike lanes will travel along Bluff Creek Drive and Playa Vista Drive to connect with the Ballona Creek bike trail.

The Project will provide paved shoulders along both sides of Route 1 (ranging in width from four feet at intersections to eight to nine feet between intersections) that can be utilized by bicyclists traveling along Route 1 through the Project area.

The Route 1 Phase I Project includes construction of ADA-compliant sidewalks along both sides of Route 1 in the vicinity of the Jefferson Boulevard intersection and along the east side of Route 1 south of Jefferson Boulevard. Although sidewalks are not currently provided in the subject section of Route 1, the sidewalks will be constructed to connect to the existing sidewalk system in the Westchester area to the south to support the future urbanized nature of the area through which the Project passes. Handicapped access ramps will be provided at each intersection.

The Project does not include construction of a continuous sidewalk along the west side of Route 1 south of Jefferson Boulevard since it was anticipated that a pedestrian walk would be provided outside of the highway right of way as part of the separate adjacent freshwater marsh restoration project. However, at-grade pedestrian access across Route 1 will be possible via crosswalks at the signalized intersections of Route 1 at Hughes Terrace, Teale Street, Jefferson Boulevard, and Fiji Way, and concrete sidewalks will be provided along the west side at these locations to provide pedestrian refuge at bus stops in the southbound direction.

At such future time as pedestrian pathways are provided in the freshwater marsh area, it would be possible to connect these with the sidewalks and crosswalks to be provided as part of the Project. —Stephanie Reeder and Aziz Elatter, Caltrans, letter, January 16, 2002

While the Commission is encouraged by the response concerning pedestrians, the proposal indicates that the Caltrans will depend on the adjacent private developer to provide a bikeway. The bikeway would be located just outside the coastal zone, as is the dedicated but unimproved transit way. The proposals are not accompanied by plans. The Commission notes that the berm for the freshwater marsh is four feet to eight feet above ground level near Jefferson. Without detailed designs it is difficult to visualize how pedestrians, and since it is a state facility, handicapped individuals could make their way from the intersection with the handicapped access at the bus stop to the walk way around the berm. More detailed designs are necessary before the

Commission can find that adequate recreation support facilities will be provided to assure consistency with section 30240(b) and the public access policies of the Coastal Act.

The basic conflict with park use and public access, however, is the scale of the widened road and the speed of the traffic that it will accommodate. Caltrans indicates that it has no alternative site for such a road and such a road is needed; the area is planned for a low-key recreation site. The facility itself is incompatible with recreational use of the adjacent area. The project must be denied because the lanes do not leave room for a bus/bicycle corridor, provide view areas, or a walkway alongside the road, provide turn outs and or bus stops, safe crossing, or median landscaping and trees. An alternative would be to construct narrow, non-standard lanes, which would slow down traffic and provide room for these other uses and for additional landscaping. A second alternative would be to plan for a six-lane road instead of an eight-lane road, to move the facility to the east. As proposed, this development is not consistent with the recreation and access policies of the Coastal Act.

E. WETLANDS AND OTHER SENSITIVE HABITAT AREAS.

Section 30233 of the Coastal Act limits fill in wetlands except for certain purposes. Sections 30231 and 30240 protect the productivity of habitat areas. The applicant proposes to construct this road widening in an area that includes 0.15 acres of filled former wetlands. The Commission permitted the fill under permit 5-91-463 (Maguire Thomas Playa Vista) to create a habitat area, a freshwater marsh.

Section 30233 of the Coastal Act states, in part:

Section 30233

The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(7) Restoration purposes.

In 1989, the United States Army Corps of Engineers delineated the wetlands in Playa Vista (Exhibit 11). In 1991, after the Corps mapped its jurisdictional wetlands in Playa Vista, the Department of Fish and Game upgraded its 1983 Playa Vista wetland maps to identify as state wetlands all areas in Area B, Playa Vista that the Corps identified as wetlands (Exhibits 11 and 12.) Previously the Department of Fish and Game had

designated these areas "Ag," as farmed area that could revert to wetland if farming ceased (Exhibit 12, p 6.)

In 1991, the Commission, relying on the 1983 delineation by the California Department of Fish and Game, approved fill of wetland for the freshwater marsh. The proposal was to fill wetlands in the southeast quadrant of Playa Vista Area B and create a 26.1-acre flood control/water treatment and restoration facility known as the Freshwater Marsh (5-91-463 Maguire Thomas). In approving permit 5-91-463, the Commission allowed Maguire Thomas Playa Vista, the developer of Playa Vista, to fill 6.9 acres of wetlands in Area B for restoration purposes. At that time, the Commission reviewed statements by the developer that it intended to fill an additional 0.15 acres of wetlands "of Area B". The applicant incorporated the request to fill 0.15 wetland acres (filling Centinela Creek between the fresh water marsh berm and the edge of the pavement) into a "Supplemental Application." (Exhibits 7 and 8). The Supplemental Application includes plans for the grading adjacent to Lincoln Boulevard to fill 0.15 acres of Centinela Creek to prevent runoff from Lincoln and the creek from ponding and undermining the berm.

The proposed project would widen Lincoln Boulevard over this graded area, extending about 70 feet west of the present pavement, to the toe of the berm of the freshwater marsh approved in 5-91-463. A site visit confirmed that there is presently fill on the right of way between the existing line of pavement and the toe of the freshwater marsh. John Dixon, the Commission staff biologist visited the site on September 18, 2001. His opinion is the following:

Just a note to summarize the results of our 9/18/01 site visits.

Lincoln widening: There was no evidence of wetlands within the area proposed for street widening. On the east side of Lincoln there is no or very little widening and related disturbance planned. In any event, the area adjacent to the street appears to be fill that is formed into a berm along much of the corridor, and all the vegetation appears to be ruderal and upland. We viewed this area through a chain link fence. On the west side of Lincoln, the entire corridor has been graded as part of the construction of the new detention basins. I have not researched the historical extent of wetlands in this area. (John Dixon, Coastal Commission Senior Biologist.)

In 1992, the Corps approved a 404 permit for incidental fill in Playa Vista, including fill in Area B for the freshwater marsh proposed by Maguire Thomas Playa Vista and for widening Lincoln Boulevard to accommodate traffic generated by Playa Vista. The Department of Fish and Game approved a Streambed Alteration permit for the work on the freshwater marsh inside and outside the coastal zone. The result of these actions was that both the Commission and the Corps approved the fill of wetlands located south of and immediately adjacent to Lincoln Boulevard. Opponents challenged that 404 permit in federal court. Recently the Supreme Court declined to hear an appeal of a Court of Appeals action sustaining the Corps 404 permit.

This road expansion will place additional fill on and adjacent to the area that the Corps and the Commission approved to be filled as part of the Freshwater Marsh project. The fill for this project will extend almost to the toe of the wetland berm. In its application, for this road, Caltrans indicated that Caltrans proposes no wetland fill is as part of the project. While the project raises other potential issues concerning compatibility with habitat areas, it does not include the placement of new wetland fill and is consistent with Section 30233 of the Coastal Act.

F. ENVIRONMENTALLY SENSITIVE HABITAT AREAS.

The Coastal Act contains strong provisions for the protection of the biological productivity of environmentally sensitive habitat areas.

Section 30231 Biological productivity; water quality

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240 Environmentally sensitive habitat areas; adjacent developments

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Issues of compatibility with habitat involve noise, lightning and water quality. The entire area of Lincoln will drain to the freshwater marsh. While this improves water quality of the discharge into Ballona marsh, the Department of Fish and Game in its February 1991 letter to the Commission expressed reservations about the compatibility of a freshwater wetland and a treatment facility (5-91-463). The Commission has received extensive materials regarding the effects of lighting and traffic noise on marsh and habitat areas (Exhibit 5). Increasing lighting levels and moving the edge of the pavement 70 feet toward the freshwater marsh will, based on papers that the Commission has reviewed, most likely have impacts on the feeding, nesting and breeding behavior of animals that depend of diurnal cycle of light and darkness.

While the applicant is willing to accept conditions to limit and shield its lighting, the loss of the 70-foot setback between Lincoln and the freshwater marsh berm will represent a

significant impact on the ability of the freshwater marsh to become a productive environment. An alternative would be to place the entire road farther east, planting the 70-foot area in taller riparian trees or other plants as a buffer and sound barrier. While there are other more powerful reasons to deny this application, the Commission cannot approve this project without looking at alternatives that would increase the setback from the freshwater marsh and provide a buffer and additional area for filtration of water before it flows into the marsh. If this is not feasible, an alternative is denial until another way of providing a setback can be found. The Commission commonly seeks a 100-foot setback from marshlands for single-family houses, reducing the setback only if requiring a greater setback will result in a taking. Noise studies quoted in environmental documents usually show that single-family houses are about half to two thirds as noisy as a high-speed highway. The absence of buffer is a persuasive reason for denial of this project until alternatives, including alternate locations for the edge of the road, can be investigated. As proposed, the project is inconsistent with Sections 30231 and 30240, but does not propose wetland fill or raise issues of consistency with Section 30233 of the Coastal Act.

G. VISUAL IMPACTS.

Coastal Act sections 30240 and 30251 state, in part:

Section 30240

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30251

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

This road would be a highly visible 152 foot-wide structure. When widening Lincoln was originally contemplated, it was to accommodate traffic generated by Playa Vista. The Playa Vista Master Plan, approved in the 1984 LUP, allowed 60 –100 foot high structures west of Lincoln. Views over the wetland were proposed from a frontage road west of these structures. The bottom two to three stories of the structures directly west of and adjacent to Lincoln would consist of parking structures and would not provide views through the project. However, if current proposals to purchase Areas A and B are successful, Lincoln Boulevard will be located on the eastern edge of a restored wetland habitat area and park. The heights of park features would not exceed one or two feet –perhaps four feet for areas retained in coastal sage scrub.

The width of the road would greatly exceed the height of nearby features, and in contrast, would give the impression of a vast pavement, adjacent to a low brown field. It would not invite pedestrians to venture across it to see what was on the other side of the road. Viewed from the park areas, an eight-lane road (with shoulders and turn pockets) would be wide and obtrusive. Lights from the cars (and noise) would have impacts on the wildlife. It is nearly impossible to mask a structure of this size. The Commission finds that planning the road and the ways to reduce its visual impact should take place along with planning for the park/habitat area, rather than being presented to park planners as a problem that it would be incumbent on the park planner to solve. As proposed, the road is not subordinate to its setting and could significantly degrade the visual quality of the Area A, B and C wetlands. It would be inconsistent with Coastal Act Sections 30240 and 30251 with respect to impacts on views and on park and habitat areas.

H. WATER QUALITY MARINE RESOURCES

Section 30230 requires the protection of marine resources. Roads are major sources of pollutants that flow into water bodies. The project will add 3.31 acres of impervious surface to an existing 14-acre road. The project is proposed in an area that included a historic wetland. The project however will drain into the Ballona Freshwater Marsh, a water treatment and restoration facility that is located on a former wetland. In order to protect water bodies and water quality from polluted run-off. Caltrans encourages trash removal programs. While Caltrans states that there will be 1.45 acres of landscaped area, Caltrans has not proposed this landscaping as part of this project and has not provided a plant list.

Sections 30230, and 30231 of the Coastal Act state:

Section 30230.

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal

waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231.

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The Caltrans program for best management practices on highways includes the following:

The latest edition of the Caltrans Storm Water Management Plan dated August 2001 has the following approved Best Management Practices (BMPs) that Caltrans has found to be effective in treating highway runoff at the present time. Caltrans is continually conducting research and evaluation of all types of BMP products to determine what other BMPs Caltrans can adopt for use. Caltrans guidance design manuals recommend Source Control BMPs over Treatment Control BMPs as generally being more effective in addressing water quality. Source Control BMPs treat water prior to entry into the system, whereas Treatment Control BMPs treat water after it has entered the system.

A. Source Control BMPs:

1. Preservation of Existing Vegetation
2. Concentrated Flow Conveyance System
 - a. Ditches, Berms, Dikes, and Swales
 - b. Overside Drains
 - c. Flared Culvert End Sections
 - d. Outlet Protection/Velocity Dissipation Devices
3. Slope/ Surface Protection Systems
 - a. Vegetated Surfaces
 - b. Hard Surfaces

B. Treatment Control BMPs:

1. Biofiltration: Strips/Swales
2. Infiltration Basins
3. Detention Devices
4. Traction Sand Traps (Only applies in Lake Tahoe Area)
5. Dry Weather Flow Diversion

Project designs generally incorporate several of the above mentioned source control BMPs that provide a water quality benefit. Some of these treatments may not be obvious (such as slope paving) however, they provide a water quality benefit by

prevention of erosion and sediment flowing into the waterbodies, thus reducing the pollutant discharge.

After taking a closer look, research conducted by Caltrans thus far has indicated that Drain Inlet Inserts (e.g. Fossil Filters) is an ineffective application for this type of highway project. In addition, Fossil Filters may present a safety hazard for the motoring public due to the potential for drain inlet failure, which would lead to flooding on the adjacent roadway. Several studies have been conducted by Caltrans in regards to their performance for use on some highway facilities.

In considering the consistency of projects with the Coastal Act, the Commission has consistently required that the design of treatment control devices proposed be sized for a two year 24 hour storm event, and that the treatment could occur in 85% of the storms. Because this project depends on the freshwater marsh and because it is located in a low lying area, if it were to approve this project the Commission would require that the applicant provide detailed hydrological calculations, outlining how the roadway and the water flowing off the roadway will work in conjunction with the freshwater marsh. The applicant has provided a hydrological study that indicates that the drainage devices are sized adequately to carry off the water expected on the road. The applicant has not provided a narrative analysis describing how the roadway drains will work together with the marsh and the relationship of the timing of the expected completion dates of the two projects. Playa Capital asserts that the Freshwater marsh is sized to accommodate the road widening projects. The Commission agrees that the freshwater marsh facility, which is sized to accommodate 100 acre-feet, is sized adequately to handle major storms. Nevertheless, the Commission, if it were to approve this project would impose conditions to assure adequate pretreatment of waters entering the freshwater marsh. The Commission notes that the Department of fish and game expressed reservations about the amount of road runoff entering the marsh, and it is important to as much as possible to limit the amount of pollutants entering water entering the marsh by employing BMP's within the road drains and installing appropriate roadside landscaping.

The second water quality impact of a construction project that anticipates moving 66,529 cubic yards earth is the handling of older contaminated sediments and avoidance of siltation during construction. Caltrans proposes to do the work in stages and use standard sand bagging and other siltation control methods such as covering stockpiles and to use watering to reduce fugitive dust. If the project were otherwise approvable, the Commission could adequately address the sediment issue by incorporated the construction BMP's proposed by the applicant enhanced by conditions similar to conditions that the Commission has imposed on similar projects.

Caltrans has indicated that it intends to bury lead-contaminated sediments under the roadway. The sediments will be placed no less than 1.5 meters above the ground water table. While in general, burying lead-contaminated sediments is regarded as a benign solution to the problem (Lead is generally not water-soluble and binds with clay and silt, which is found in marshy soils). The Commission, if the project were other wise approvable, would allow this practice only if 1) Caltrans followed state standards

from the Department of Toxic substance control, (DTSC) and 2) that the only sediments buried on site are those from the project itself; that Caltrans not use surplus contaminated earth from other sites for this purpose. In this way, Caltrans will reduce the amount of lead in the marshland system rather than increasing it.

During the excavation of the freshwater marsh, some contaminated sediments were discovered. The coastal development permit did not anticipate or address this problem. Instead it established standards for the marsh's functioning after construction and revegetation. However, the Regional Water Quality Control Board required the applicant for the freshwater marsh to truck the sediments to various landfills outside the coastal zone. While there was some controversy with the DTSC, that had earlier delegated its oversight role to the Board, the material (drilling mud) was removed.

The new roadway is designed to drain into the freshwater marsh approved in 5-91-463. The purpose of the freshwater marsh was to capture the run-off from roads and other impervious surfaces that would result from construction of the Playa Vista project. The marsh was designed to accept 100-acre feet of runoff, which the Commission has found to be adequate in its initial review of hydrology studies provided with the application for the freshwater marsh (5-91-463.) The 26.1-acre freshwater marsh is designed to protect the wetlands from pollution from impervious surfaces and from a sudden flood of freshwater when a storm interacts with the increased impervious surfaces found in the Playa Vista project.

The Commission staff investigated the water quality issues and determined that there were standard conditions that if applied to this development would minimize pollution from run off. The conditions would have required pre-treatment of storm water, and control of siltation during construction. The Commission finds that the water quality impacts of this project could be reduced if the project were otherwise approvable, and that the project could be conditioned to achieve consistency with Sections 30230 and 30231 of the Coastal Act.

I. HAZARDS.

The Coastal Act provides that development shall be sited and designed to avoid hazards. Section 30253 requires, in part:

Section 30253.

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

After the discovery of high levels of soil gas in Area D Playa Vista, the public has consistently expressed concern about the levels of soil gas in nearby areas. Tests conducted for a nearby project (Playa Vista Phase I, see substantive file documents) showed high levels of soil gas in an area south of Jefferson Boulevard. A report conducted by the City of Los Angeles City Legislative Analyst identified significant soil gas accumulations north of Lincoln Boulevard and south of Jefferson Boulevard. The present project is on Lincoln Boulevard in an area in which levels of methane gas have been detected that would require mitigation if it occurred in structures. The source of this is a report by the City of Los Angeles Legislative Analyst that provides a chart (exhibit) showing the level of mitigation required as a function of the amount of soil gas detected. . The levels are grouped as Level II "green" 100 to 1000 ppmv and "yellow" 1000 to 12500 ppmv. The version of the chart for public circulation is printed in colors that are difficult to distinguish -- the yellow and the orange, for example are not distinguishable. The staff has interpreted the map by counting the contour lines from the blue, which is distinguishable from yellow or white. According to staff's best reading of the map prepared at the behest of the City Legislative Analyst, this is an area in which enclosed structures require mitigation. However, this project is not an enclosed structure. Exhibit

On a related project, the Route 90 Bridge, Caltrans sought an opinion from Gustavo Ortega, a Caltrans staff geologist, concerning the possible hazard of soil gas to its project. The geologist replied that methane is a potential hazard in confined spaces, but that there were no confined spaces proposed as part of the development of this bridge and ramp. Moreover, the Coastal Commission staff geologist, in an analysis of a proposal to expand Culver Boulevard, A-5-PLV-00-417, has indicated that soil gas does not pose a hazard to roads or the vehicles on them because soil gas does not accumulate where there are no enclosed structures.

The soils in this area are made up of sediments deposited by creeks and other water bodies. There is a relatively high groundwater table. Adjacent to the newly constructed freshwater marsh, which is on a former wetland, soils are soft and compressible. The applicant's geologists have taken these conditions into account and designed to accommodate these potential hazards. Next to the freshwater marsh, Caltrans geologists require that the road be constructed using geo web at its foundation. The project is located in an area that is protected from flooding by the Ballona Creek Channel. The area is also a liquefaction zone and is a tsunami run up zone.

This project is not located in an area of landslides, but is located in an area of soft soils where the ground could liquefy if there is a large earthquake. An early report on the gas under the site identified a possible earthquake fault parallel to Lincoln Boulevard. Subsequent studies by other geologists have failed to confirm the existence of the fault. The fault, if it exists, is located east of Lincoln. Structures in liquefaction zones are required by state construction standards to assure safety of the occupants with special foundations. Caltrans geologists indicate that roads in liquefaction zones are assumed to be repairable; the Caltrans geologist asks no special protection for this project except

to specify the use of geo web adjacent to the fresh water marsh installed by the applicant for Playa Vista. The Commission finds that the project would be would not endanger life and property, consistent with Coastal Act hazard policies. However, since the design and the report are the responsibility of the applicant and the conclusion that the development is safe is based on the applicant's research, the Commission would impose a condition requiring that the applicant assume the risk of this development. If so conditioned, the Commission could find that the project is consistent with the hazard policies of the Coastal Act.

J. PROJECT BACKGROUND

Caltrans is the applicant for this road widening; Playa Capital is responsible for the design and construction of this road widening. This particular project is a required mitigation measure for the first phase of the Playa Vista development, but is also a response on the part to Caltrans and other transportation agencies to the degree of crowding that drivers on Lincoln now face, even before completion of Playa Vista's First Phase. This project is part of a plan long advocated by Los Angeles City and County transportation planners. Lincoln is the main thoroughfare linking Santa Monica with the airport. It is a major highway that connects the 10 Freeway with Santa Monica, Venice and Playa del Rey.

The Commission initially reviewed road widening plans and future traffic volumes for the Marina del Rey/Ballona area when it certified the Marina del Rey/Ballona Land Use Plan in 1984. The 1984 plan anticipated intense development in the subregion and required major road improvements to accommodate it. Since then, the Commission has increased the number of the peak hour trips that may be generated by new development in Marina del Rey from about 2400 peak hour trips to about 2700 peak hour trips. Traffic generation expected from Playa Vista has remained about the same, although Playa Capital has now proposed a different mix of uses than the Commission reviewed in 1984, when it certified the Marina del Rey/Ballona Land Use Plan.

Development approved in the Marina del Rey/Ballona Land Use Plan (exhibit) for both the Marina del Rey and for what is now Playa Vista included:

USE	Hotel rooms	Rest-aurant seats	Boat slips	Commer-cial sq. ft.	Marine Commer-cial sq. ft.	Resi-dential units	Office sq. ft.
Marina del Rey	1,800	462	20 acres	14,000	"varies"	1,500	200,000
Playa vista Area A	1,800		26 acres	200,000		1,226	
Playa vista Area B				70,000		2,333	
Playa vista Area C				150,000		2,032	900,000
TOTAL	3,600	462	46 acres	424,000		7,091	1,100,000

Before approving this level of development Los Angeles County required the applicant with the biggest project, Summa Corporation, to prepare an evaluation of the traffic impacts of the development and a list of road widening projects that would accommodate it. In 1992, Los Angeles County accepted a study prepared by Barton Aschman Assoc. for Summa Corporation to address its proposed development. The study took into account development in "areas peripheral to the LCP zone "... "inasmuch as this development will have a significant impact on LCP area traffic. The study took into account not only proposals in the Marina del Rey, and Summa's proposals but also it addressed traffic impacts expected from development in the "Subarea." This development included (1) a major project at the 405, Centinela and Sepulveda Boulevards, (2) 4 million square feet of Airport related commercial and industrial development, (3) 3.6 million square feet of commercial and industrial development in Culver City, and (4) "on the vacant property east of Lincoln and south of Ballona Creek, 3,200 dwelling units, 600 hotel rooms, 3 million square feet of office space and 400,000 square feet of commercial uses" (Playa Vista Area D).

The traffic improvements approved in the Marina del Rey/Ballona plan to accommodate that development included⁶ (Exhibits):

- 1) Widening Lincoln Boulevard to eight lanes;
- 2) Constructing a four-way loop ramp at Culver and Lincoln Boulevards, lower Culver Boulevard, and bridge Lincoln Boulevard over it;
- 3) Widening Culver Boulevard to six lanes between Lincoln Boulevard and Vista del Mar; and to eight lanes between Lincoln Boulevard and the marina freeway, realigning Culver Boulevard in Area B;
- 4) Realigning the Culver Boulevard interchange with Jefferson Boulevard.
- 5) Extending Admiralty Way to the realigned Culver Boulevard;

⁶ Presented in a different order with different numbers in the Land Use Plan. See Exhibit)

- 6) Widening Jefferson Boulevard to six lanes;
- 7) Extending the Marina Freeway just west of Culver Boulevard with a grade-separated interchange at their intersection;
- 8) Extending Bay Street north of the Ballona Channel;
- 9) Building the "Marina Bypass" (a four-lane high-speed road along the Pacific Railroad right of way between Lincoln and Washington Boulevards);
- 10) Extending Falmouth as a four-lane road to Culver and Jefferson Boulevards.

Many of the proposals had been considered by transportation planning agencies for many years. The Barton Aschman report and the submitted LUP cite County and City transportation planners in explaining the choices.⁷

When City of Los Angeles annexed Areas B and C of the land subject to that plan, the City incorporated most of the traffic improvements into the Playa Vista Land Use Plan that the Commission certified in 1986.⁸ The improvements included the extension of Admiralty Way to Culver Boulevard, widening Lincoln Boulevard to eight lanes, widening Culver and Jefferson Boulevards, and extending the Marina Freeway. With respect to Lincoln Boulevard and associated transportation improvements the certified Playa Vista LUP states:

Page 43, Policy 14. At the Culver and Lincoln boulevards interchange, Culver Boulevard should be lowered to an at-grade level with Lincoln Boulevard bridged over it; and the following ramps shall be provided:

- (a) *A loop ramp in the southeast quadrant accommodating eastbound Culver Boulevard to north bound Lincoln Boulevard flow.*
- (b) *A straight ramp in the southeast quadrant accommodating north bound Lincoln to eastbound Culver Boulevard flow.*
- (c) *A loop ramp in the northeast quadrant accommodating westbound Culver to south bound Lincoln Boulevard flow (for reference only, located in Area A).*
- (d) *A straight ramp in the northwest quadrant accommodating southbound Lincoln to westbound Culver Boulevard flow. (Outside City jurisdiction located in Los Angeles County.)*

⁷ Two of the improvements were since removed from the plan. Falmouth Avenue was removed as a result of the Friends' of Ballona lawsuit because it established a new road in the wetland. The City of Los Angeles withdrew its approval of the Marina Bypass, an unpopular improvement, and approved housing on the proposed right-of-way.

⁸ The County did not adopt them, adopting only improvements within the Marina del Rey proper and a schedule of improvements that linked stages of development of Area A, which it had retained, to improvements by other Playa Vista project areas. When the County submitted a separate implementation program applying only to the Marina del Rey proper, it included only improvements to streets within the Marina was part of that plan. The County deferred policies addressing widening major streets outside the Marina such as rerouting Culver Boulevard and widening Lincoln as part of the future LCP for Area A, which was then still owned by the owners of Playa Vista.

Page 43 policy 15: Widen Lincoln Boulevard to provide an eight-lane facility between Hughes Way⁹ and Route 90.

Page 43 policy 16: Jefferson Boulevard will be developed as a basic six-lane facility with an additional eastbound lane between Lincoln Boulevard and Centinela Avenue. (Part of this is outside the coastal zone.)

Page 44, policy 17: Reserve right-of-way for a transit way linkage in the Lincoln Boulevard corridor.

Page 44 policy 18: Extend the Marina Freeway, just east of Culver Boulevard, with a grade-separated interchange at their intersection.

Page 44, policy 19: Extend Bay Street, north of the Ballona Channel as a basic four-lane facility, construct a bridge across the Channel.

When the City of Los Angeles reviewed the First Phase Playa Vista EIR in the early 1990's, the City based its traffic analysis on the Barton Aschman report and on an addendum that it had requested. The City required the first phase of many of these identified "road improvements" as mitigation measures, because they would increase road capacity. All development authorized in the First Phase EIR, with the exception of the Freshwater Marsh, is located outside the coastal zone, east of Lincoln Boulevard.

Phase One, Playa Vista, which is located outside the Coastal Zone will include the following development.

	Dwelling units	Retail Sq. ft.	Community serving sq. ft	Office Industrial Media center sq. ft	Open space other habitat	Wetlands
Phase I	3,246	35,000	120,000	2,077,050 office 1,129,900 studio	26A	26

The traffic analysis of the First Phase Playa Vista EIR describes what were then current traffic volumes in this part of Lincoln Boulevard. Traffic was already heavy in 1990 (Table on following page).

⁹ Hughes Way is now identified as Loyola Marymount University (LMU) Drive.

Intersection:		1990		1997 without project		1997 with project	
		Volume/ capacity	LOS	Volume/ capacity	LOS	Volume/ capacity	LOS
Lincoln/ Manchester	a.m.	0.979	E	1.225	F	1.261	F
	p.m.	1.121	F	1.356	F	1.422	F
Lincoln Jefferson	a.m.	0.971	E	1.274	F	1.454	F
	p.m.	0.967	E	1.334	F	1.547	F
Lincoln/ Maxella	a.m.	0.625	B	0.873	D	0.931	E
	p.m.	0.818	D	1.202	F	1.270	F
Lincoln/ Route 90	a.m.	0.763	C	0.975	E	1.044	F
	p.m.	0.804	D	1.151	F	1.207	F
Lincoln/ Washington	a.m.	0.977	E	1.364	F	1.415	F
	p.m.	1.105	F	1.534	F	1.512	F

Source: Playa Vista Draft First Phase EIR, Pages V.L.1-42 and V.L.-44: Table V.L-I-6

The EIR anticipated that by 1997, even without the project, traffic levels would exceed level F (level F is 100% occupancy. A volume capacity ration of 1.105 "exceeds " level F, (the most congested level of service, essentially stop and go) at several intersections. With the now approved project, the EIR anticipated that the level of service would be significantly worse (third column). When it adopted the final EIR mitigation measures, the City of Los Angeles required the widening that is subject to the present application. In addition to ATSAC (speeding up traffic by manipulating traffic light intervals), the City required the applicant to provide the following improvements to Lincoln Boulevard in the coastal zone¹⁰:

- 40. Lincoln and Mindanao (restriping and removal of islands, see Exhibit.)
- 42 Lincoln and Teale St.

- (a) . Dedicate property and widen Lincoln Boulevard along the project frontage (both east and west sides from a point approximately 800 feet southerly of the proposed realigned Teale Street centerline to a point approximately 40 feet southerly of the Jefferson Boulevard centerline to Super Major highway standards with a 114 foot road way within a 134-foot right-of-way. However the applicant has offered to provide a 126-foot roadway within a 152-foot right of way. Relocate and modify traffic signal equipment as required. Lincoln Boulevard is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.
- (b) Dedicate, construct and realign Teale Street east of Lincoln Boulevard to provide an 84-foot roadway within a 108 foot right of way in order to provide two left turn-only lanes, one right turn-only lane and one bike

¹⁰ All the improvements required for the project as shown in Exhibit.

lane in the westbound direction and three through lane and one bike lane in the eastbound direction.

- (c) Restripe Lincoln Boulevard to provide three through lanes and one shared through/right turn lane in the northbound direction and one left-turn only lane and four through lanes in the southbound direction.

After certification of the EIR, the applicant approached Caltrans regarding three improvements to Caltrans facilities required in the EIR mitigation measures: widening Lincoln Boulevard, increasing the capacity of Jefferson and the Jefferson /405 interchange, and adding high speed surface level ramps at Culver and Route 90 (Marina Freeway). Caltrans responded that they agreed that there needed to be away to reroute traffic off Lincoln to the east to the 405 freeway and ultimately the 10 freeway. However the geometry of the Jefferson 405 ramps prohibited the improvements that had been suggested (the ramp is too narrow to provide a safe turn with an additional lane.) Caltrans instead advocated establishing a parallel north south route, Bay Street (now known as Playa Vista Drive,) that could deliver north south traffic to Culver Boulevard; building a bridge over Culver as the first step to a full interchange of Route 90 and Culver Boulevard; increasing capacity of a north south street outside the coastal zone (Centinela). Caltrans agreed to the Lincoln widening, noting however that (1) the intersection of Lincoln Boulevard and Washington would still be at level F and above and that there were so many demands on Lincoln from the Airport and other uses that Lincoln would still be severely crowded. Caltrans advised also that the number of bus trips along this route must be increased to reduce demands on Lincoln Boulevard from Playa Vista. (Exhibits)

In response to this communication, the City revised its mitigation measures for Phase One Playa Vista in May 1993. (Exhibits). In response, the City required the implementation of more of the LUP improvements as part of Phase I, adding the Culver Lincoln loop ramp and adding Bay Street to Culver Boulevard as an alternative north-south route to Lincoln to the phase one mitigation measures. The City also adopted strict transportation demand management measures. The required road projects were to be staged along with six identified stages of construction (Exhibits 15 and 17). Lincoln Boulevard improved to eight lanes is one of the first projects that the EIR requires to be completed. This project will not provide all the widening that the Phase I EIR requires (although Phase I measures allow combination of turn lanes with travel lanes.) It does not provide extra buses, and it does not required four travel lanes all the way to from Teale Street to Fiji Way, because it does not provide 8 lanes. The remaining widening north of Jefferson would take place along with the bridge reconstruction that Caltrans also proposes next year, 5-01-450.

The Coastal Act provides that development must not overload coastal access routes. The studies by Barton Aschman did consider two ways to reach this goal: an alternative lower level of development with less road widening and an alternative higher level of development with more road widening. In 1983, Los Angeles County submitted an LUP, which the Commission certified in 1984, that showed intense development accompanied with an integrated system of road widening. The integrated system of

road widening was designed to accommodate development that was proposed east of the coastal zone. According to the report, the road widening would accommodate the proposed development and the traffic from related projects.

In approving the LUP in 1984, the Commission required a mass transit in addition to the road widening. The Commission modified the policy in its 1986 actions on the City and County versions of the same LUP to require only a mass transit right-of-way (a lane) and internal jitneys. In addition, in its 1986 actions, the Commission required that the City and the County plan their transportation improvements together, a policy that the Commission included and strengthened in approving additional development in the Marina del Rey in 1995.

This road is necessary to accommodate development located outside the coastal zone that the City of Los Angeles has already approved. The City and Caltrans determined that it is necessary to accommodate that development. The road widening is part of a larger plan to accommodate high levels of development inside and outside the coastal zone. The standard of review is not traffic efficiency. Even if the road relieves congestion outside the coastal zone or on other roads within the coastal zone, it is not exempt from a requirement that it minimize impacts to habitat, views, public access and recreation. The standard of review for the Commission, however, is the consistency of the project with the Coastal Act. As demonstrated above, this project raises issues of consistency with coastal act policies, and there is no evidence that other designs or configurations have not been evaluated that would reduce the road's impacts on coastal resources therefore this road widening must be denied.

K. CERTIFIED LAND USE PLANS.

As noted above widening Lincoln Boulevard is one of the road-widening projects incorporated into the certified Land Use Plan for Playa Vista. In 1984, the Commission approved the Marina del Rey Ballona LUP. A number of road widening projects viewed as necessary to accommodate the development approved in the plan were adopted as part of the Circulation Element of the plan (Exhibit 3). Again, in 1987, the Commission approved parallel LUP's for the Marina del Rey and, in the City of Los Angeles, the Playa Vista LUP, that showed almost identical transportation system measures, including the present project.

A certified Land Use Plan is not binding on the Commission. Until the local coastal program is fully certified, the standard of review for development, including these roadways, is consistency with Chapter 3 of the Coastal Act. When detailed information shows that a proposal is not consistent with Chapter 3, the Commission is able to deny or change development that is consistent with an adopted plan. Therefore, in the absence of a fully certified LCP, the Commission's earlier decisions that an area could accommodate certain kinds of development does not commit the Commission to approving development that is not consistent with the policies of Chapter 3.

L. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect, which the activity may have on the environment.

In this case, the applicant argues that there are no feasible alternatives or mitigation measures that would lessen the environmental effect of this development. The Commission finds otherwise. A road with narrower lanes or a road with a dedicated bus lane and sidewalk on both sides might more easily provide access to the local area. A road with a wider vegetated median strip might not present an uninterrupted swath of asphalt. While the dedication of southern Californians to their cars cannot be radically changed, a high-density node does present opportunity for other modes of ground transportation. If so the routes serving these nodes, such as Playa Vista should as much as possible, accommodate other modes of transportation.

Approval of this road in this location and configuration presents a second problem—the location of this road determines the location of the second phase widening, which will be located between Jefferson and Fiji way. Would this road have fewer impacts if the right of way were wider but used differently? Would the second phase have fewer impacts if it were narrower after the required Playa Capital link to the culver loop?

An opponent has suggested that the second phase of Lincoln (north of Jefferson) would have fewer impacts on wildlife and park use if it were elevated on columns. Independent of feasibility issues, no one has calculated how far south the grade would have to be changed in order to construct a road that was elevated enough to make a difference. How elevated should the northern portion of the road be elevated in order to encourage wildlife to pass underneath it? Is such a proposal feasible? Without investigating these alternatives, it is not possible to determine that there are no other feasible alternatives or mitigation measures available, which would lessen any significant adverse impact the activity, would have on the environment. Therefore, the Commission finds that there may be feasible alternatives or mitigation measures that would lessen or avoid the identified impacts and increase the development's consistency with the Coastal Act, a that would substantially lessen the significant adverse impacts of the development on the environment. As proposed the proposed project is not consistent with CEQA and the policies of the Coastal Act.

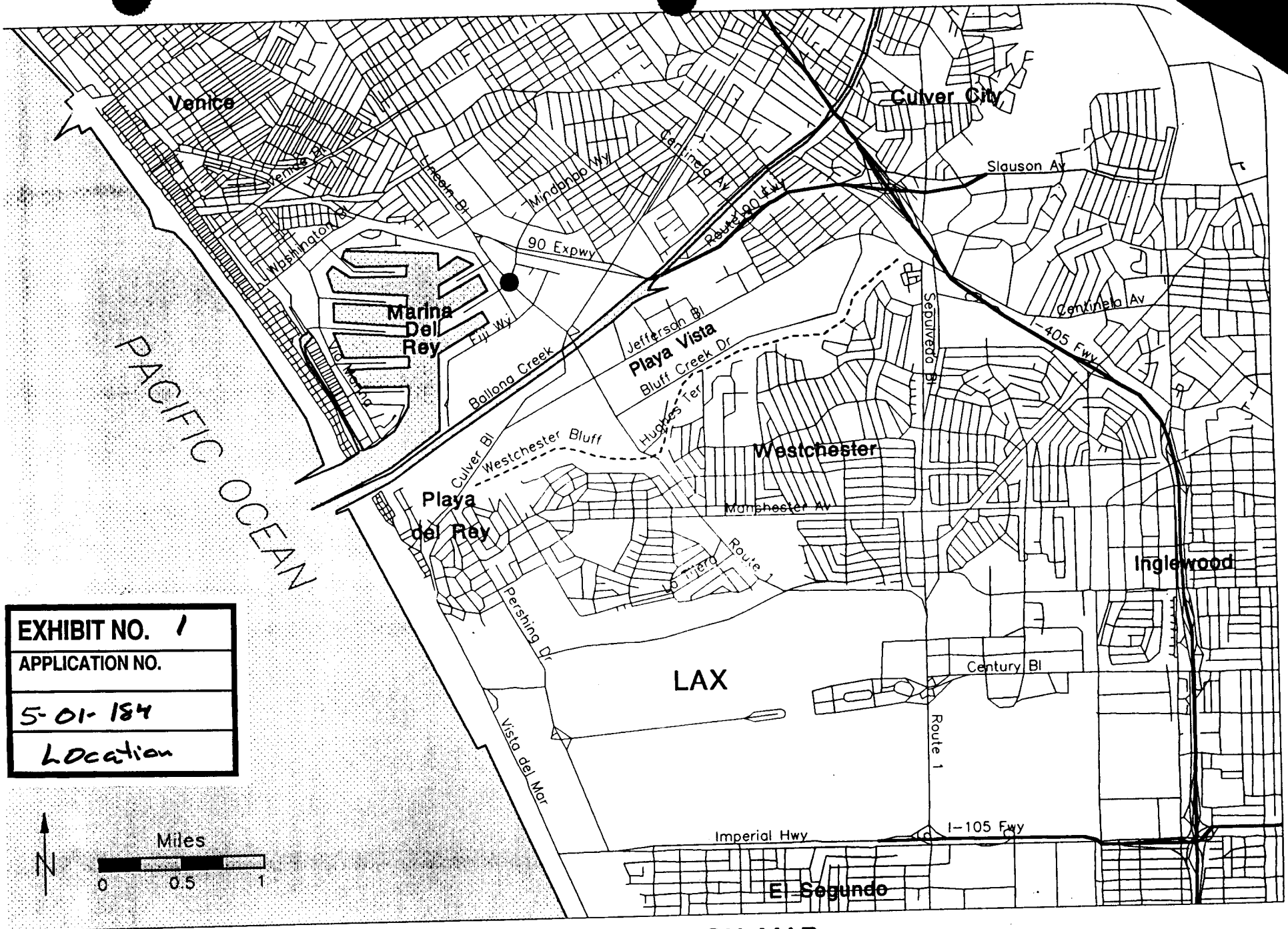
APPENDIX I
SUBSTANTIVE FILE DOCUMENTS

1. Environmental Impact Report, First Phase Project for Playa Vista, EIR No. 90-0200-SUB(c)(CUZ)(CUB) State Clearinghouse No. 90010510; Appendix D Mitigation and Monitoring Program; Mitigation Measures Tracts 49104 and 52092.
2. First Phase Project for Playa Vista, Final EIR SCH # 90010510) --EIR No 90200-Sub (c)(CUZ)(CUB)
3. Playa Vista Entertainment Media and Technology District, Mitigated Negative Declaration, Playa Vista Plant Site (Addendum to Environmental Impact Report First Phase Project for Playa Vista), August 1995.
4. LADOT Inter-departmental correspondence --Amendment of Initial Traffic Assessment and Mitigation Letter dated September 16, 1992 --Revised May 24, 1993.
5. Caltrans, Negative Declaration, based on Initial Study/Environmental Assessment for State Highway Route 1 Lincoln Boulevard widening from Jefferson Boulevard to Fiji way; construction of New Bridge over Ballona Creek and Replacement of Culver Boulevard Overcrossing, March 28, 2001 (SCH#200121126)
6. Los Angeles County Marina La Ballona certified LUP, October 1984.
7. Los Angeles County, Certified Marina del Rey LUP, 1987
8. City of Los Angeles Certified Playa Vista LUP, 1987.
9. Barton-Aschman Associates, inc., Playa Vista Study Area, Transportation Analysis, 1995 (prepared for Summa Corporation, November, 1982.
10. Barton-Aschman Associates, inc., Addendum to Playa Vista Study Area, Transportation Analysis, 1995 (prepared for Summa Corporation, February, 1993.
11. Jerry B. Baxter, District Director, Caltrans District 7, letter to Con Howe, Director of Planning, City of Los Angeles, re Playa Vista Traffic Mitigation Measures, September 10, 1993.
12. Robert Goodell, Chief, Advance Planning Branch, Caltrans District 7; Memorandum to Tom Loftus, State Clearinghouse, re DEIR Playa Vista Phase I 90-0200 SUB (C) (CUZ) (CUB), March 22, 1993
13. Coastal Development Permits and Appeals: A-5-VEN-98-222(EMC Snyder); A-5-90-653 (Channel Gateway); 5-91-463 (Maguire Thomas); 5-91-463A2, 5-91-463R; 5-91-463R2: 5-00-139W; extended (October 1997), currently expired; 5-91-463, 5-91-463A2, 5-91-463R, 5-95-148, permit waiver 5-00-139W, 5-91-463, 5-98-164, A-5-PDR 99-130/5-99-151; 6-97-161,
14. Bolsa Chica Land Trust v. Superior Ct. (1999) 71 Cal. App. 4th 493.
15. City of Los Angeles City Engineer, Memorandum Public Works Review of ETI Report Titled "Subsurface Geo-chemical Assessment of Methane Gas Occurrences" for the Playa Vista project; file 1996-092; May 10, 2000
16. Victor T. Jones, Rufus J. LeBlanc, Jr., and Patrick N. Agostino, Exploration Technologies, Inc, Subsurface Geotechnical Assessment of Methane Gas

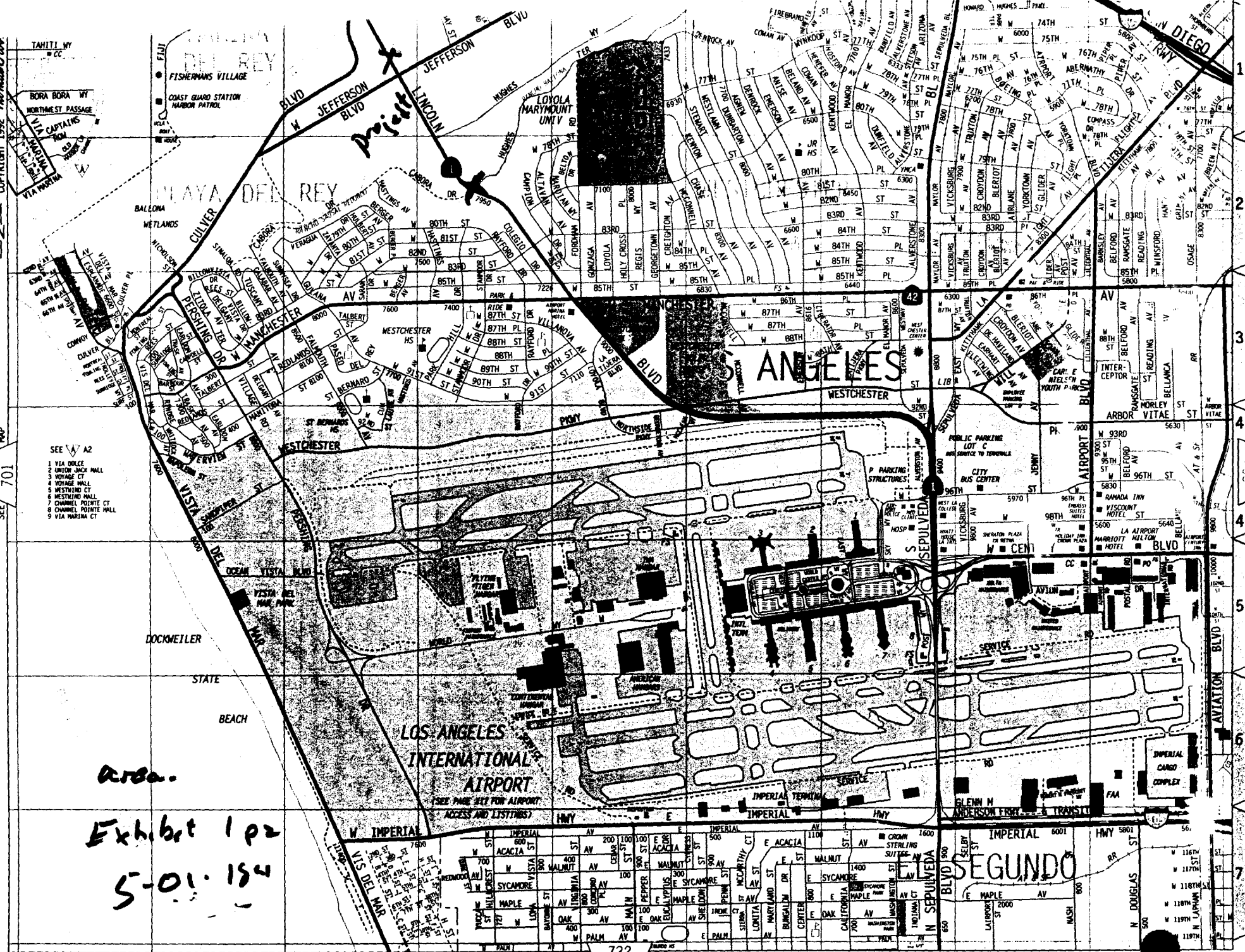
- Occurrences. Playa Vista First Phase Project. April 17, 2000. [Also referred to as the Jones Report or "the ETI report."]
17. Camp Dresser and McKee 2000, "Soil gas sampling and analysis for portions of Playa Vista Areas A and C near Culver Boulevard Widening Project" 4 page geologic letter report to Maria P Hoyer dated 27 November, 2000 and signed by A. J. Skidmore and M. Zych (RG).
 18. City of Los Angeles, Office of the Chief Legislative Analyst, City Investigation of Potential Issues of Concern for Community Facilities District No 4, Playa Vista Development Project, March 2001.
 19. Mark Johnsson, Senior Geologist, California Coastal Commission, Memorandum: "Culver Boulevard Widening Project and Potential Soil Methane Hazards"
 20. Gustavo Ortega, C.E.G., C. HG., Memorandum, January 24, 2001 to Ron Kosinski, Additional Information LA-01-KP 48.9 ad KP 49.0 "addressing ...some comments with regard to underground methane gas anomalies found in the Playa Vista project."
 21. City of Los Angeles Department of Building and Safety, Memorandum of General distribution, #92, Methane Potential Hazard Zones, March 19, 1991.
 22. California Department of Fish and Game, Memorandum: Extent of Wetlands in Playa Vista, December 1991."
 23. California Coastal Commission, Memorandum: "Volume II Preliminary Working draft EIS/EIR Existing Conditions –Playa Vista March 5, 1998"
 24. City of Los Angeles General Plan Palms, Mar Vista Del Rey District Plan, – Playa Vista Area C Specific Plan;
 25. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 49104 (As Revised December 8, 1995)
 26. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 52092 (December 8, 1995)
 27. City of Los Angeles Tentative Tract Number 44668, Map and conditions of approval, May 4, 1987.
 28. Agreement in Settlement in Litigation in the 1984 case of Friends of Ballona Wetlands, et al. v. the California Coastal Commission, et al. Case No. C525-826
 29. Wetlands Action Network, Ballona Wetlands Land Trust and California Public Interest Research Group v. the United States Army Corps of Engineers.
 30. Judge Lew, Federal District Court, June 1996, decision in Wetlands Action Network et al v United States Army Corps of Engineers.
 31. Davis and Namson, Consulting Geologists, "An evaluation of the subsurface structure of the Playa Vista Project Site and Adjacent Area, Los Angeles, California", November 16, 2000.
 32. California Regional Water Quality Control Board, Los Angeles Region, "Clean Up and Abatement Order No. 98-125, Playa Capital Company, LLC., and Playa Phase I Commercial Land Company, LLC.; 6775 Centinela Avenue Los Angeles, File No. 98-192.
 33. Sharon Lockhart, et. Al., Water Demand: Proposed Ballona Freshwater Wetland System; June 1991.

34. Camp, Dresser and McKee, Inc., Water Balance for the Proposed Freshwater Wetland system, Playa Vista, June 1991.
35. Land/Suitability Capability Study, A Summary Of The Significant Ecological Areas Report, Los Angeles County General Plan Revision Program, 1976.
36. England and Nelson, Los Angeles County Museum of Natural History; Los Angeles County Significant Ecological Areas Study, 1976.

H:\playa vista\lincon widening\5-01-184 DENIAL lincon south final.doc



PROJECT LOCATION MAP
ROUTE 1 AT MINDANAO WAY



SEE V A2
 1 VIA DOLCE
 2 UNION JACK MALL
 3 VOTAGE CT
 4 WESTING CT
 5 WESTING MALL
 6 CHANNEL POINTE CT
 7 VIA MARINA CT

Area.

Exhibit 1 p2

5-01-154

local coastal program

map 36

CIRCULATION IMPROVEMENT PLAN

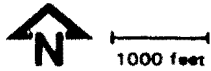


EXHIBIT NO. 2

APPLICATION NO.

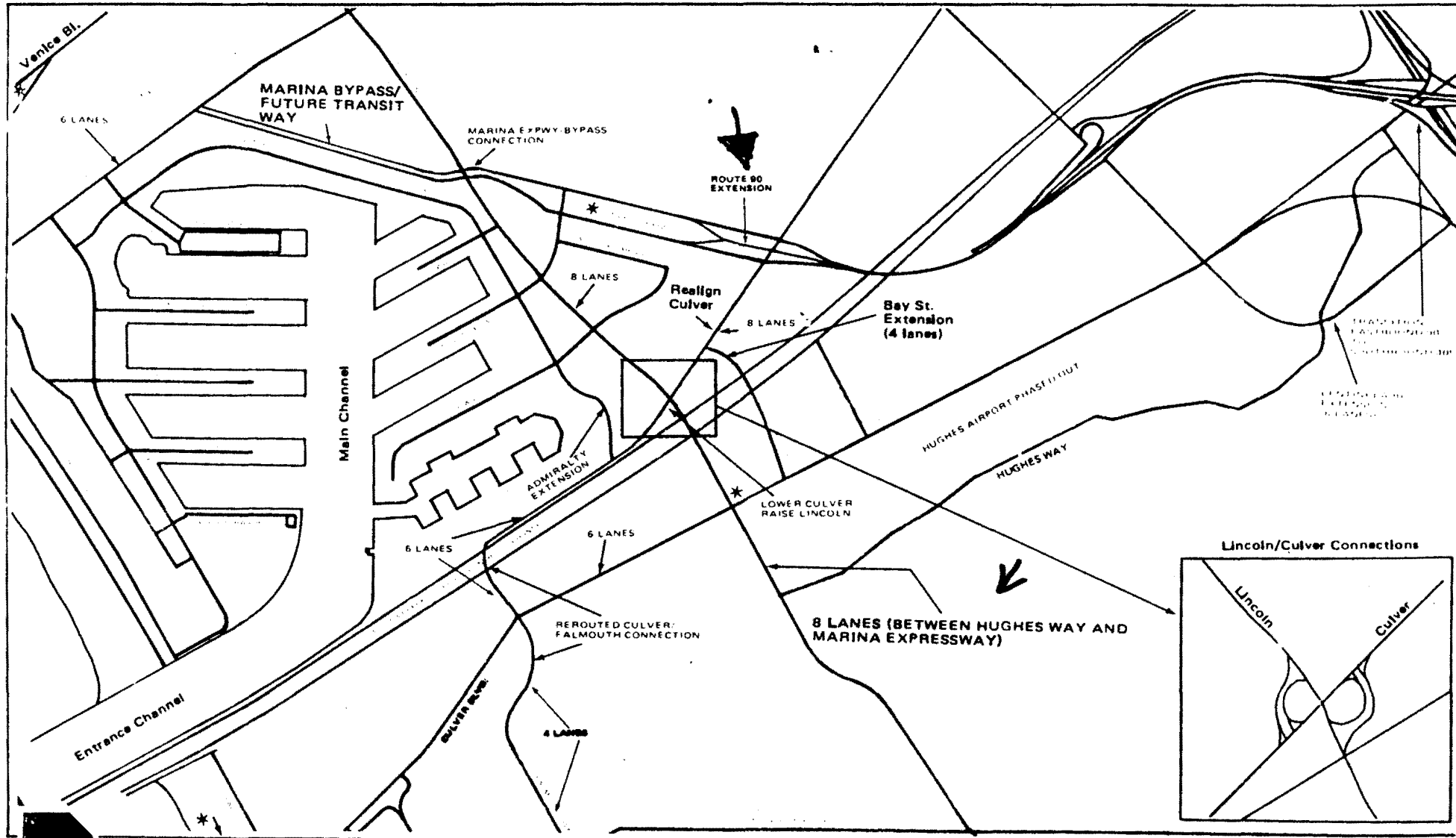
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MDR/Ballon LUP

marina del rey/ballona

*Potential Park and Ride/
Shuttle Connection Lots

Traffic Improvements
Certified MDR Ballona LUP





NEW PAVEMENT

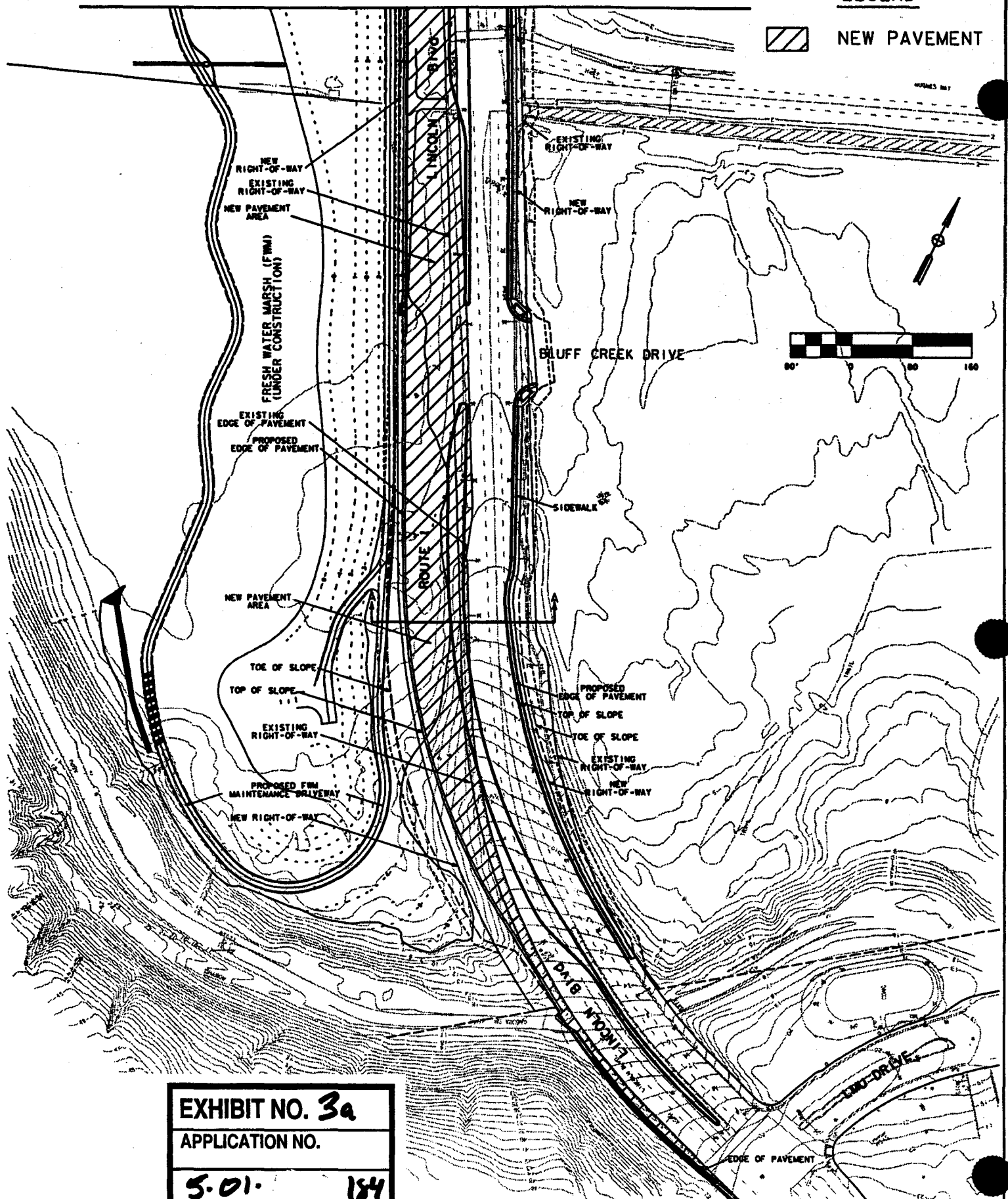


EXHIBIT NO. 3a	
APPLICATION NO.	
5.01.	184
Project Depiction	

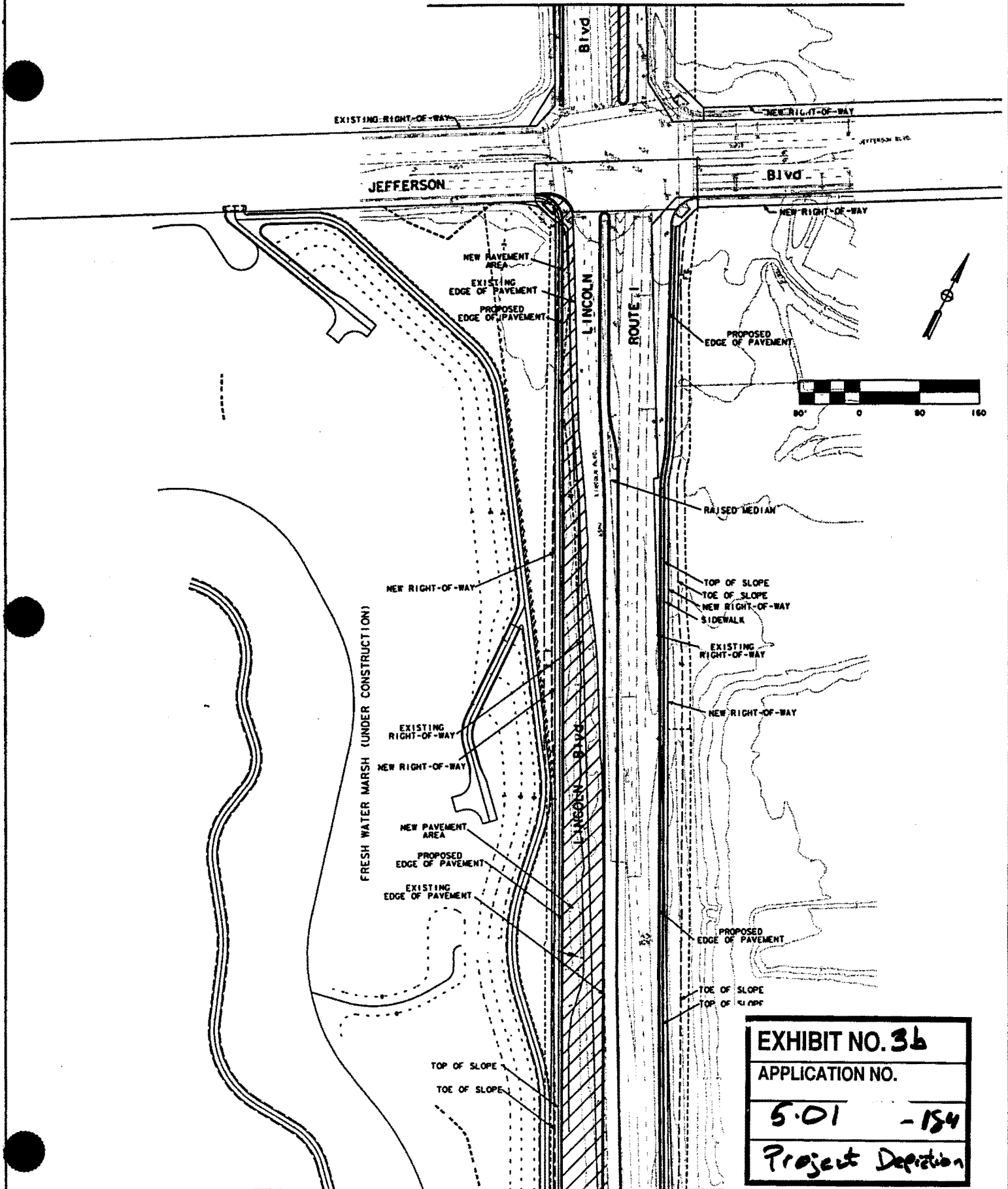


EXHIBIT NO. 3b

APPLICATION NO.

5.01 - 154

Project Description

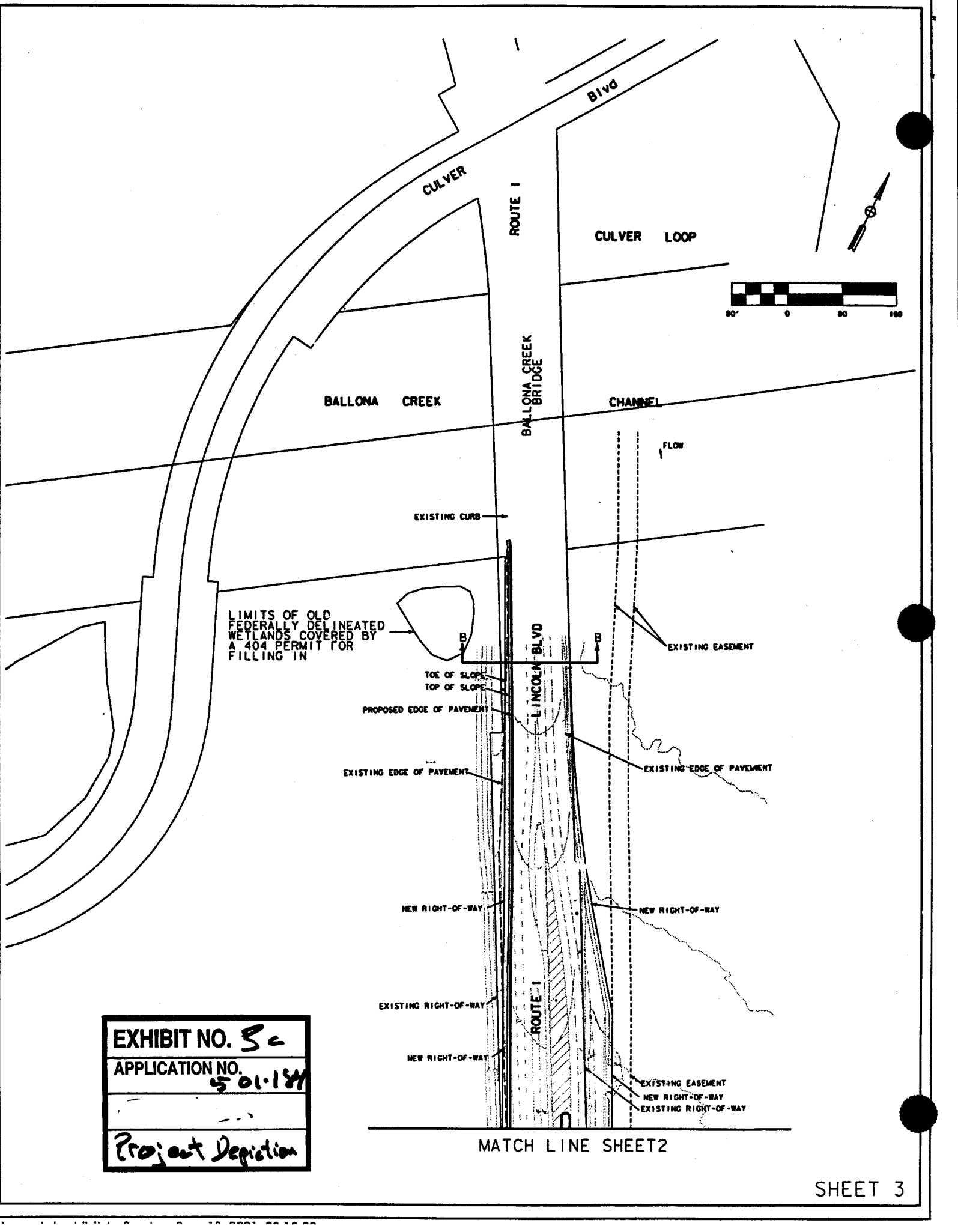


EXHIBIT NO. **3c**
APPLICATION NO. **501.184**
Project Depiction

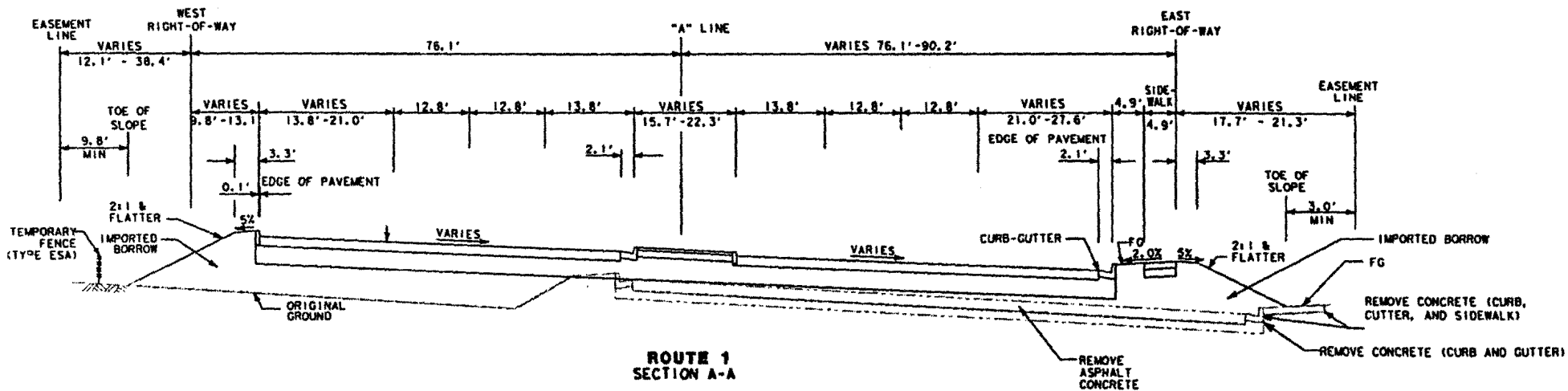
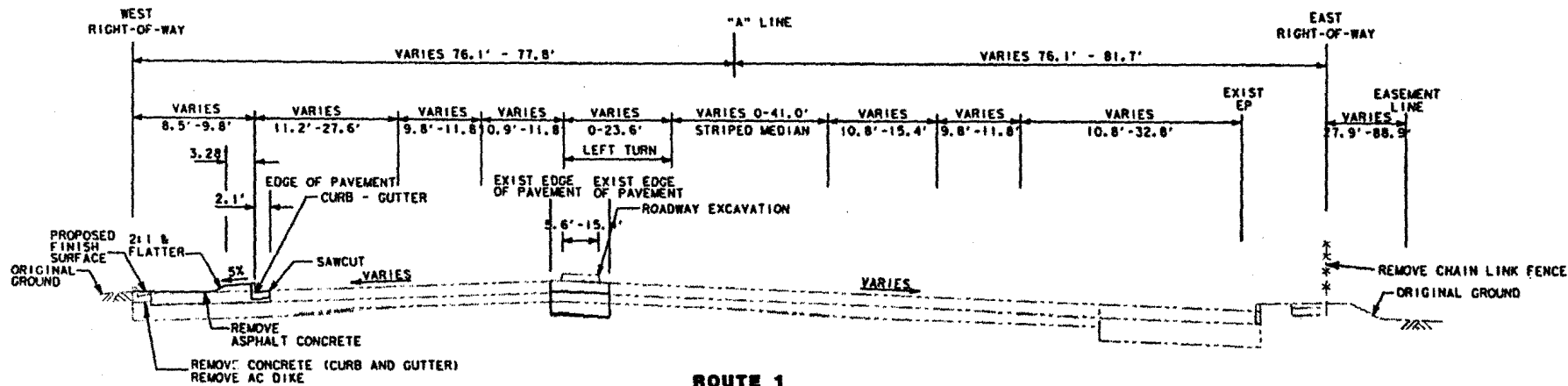


EXHIBIT NO. 34
APPLICATION NO. 5-01-184
Section project



DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610

EXHIBIT NO. 4
APPLICATION NO.
5-01-184

LAY DAVIS, Governor



August 17, 2001

RECEIVED
South Coast Region

AUG 17 2001

CALIFORNIA
COASTAL COMMISSION

Pam Emerson
California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

RE: Route 1 (Lincoln Boulevard) Coastal Development Application 5-01-184 (EA 1660U1)

Our Office received a letter of incomplete for a coastal development permit application on June 11, 2001 for the above-mentioned project.

The following information is to address the requested items of which needed further detail and/or explanation:

1. Caltrans Related Projects

A. Lincoln Boulevard (State Route 1) - Current Project

Per a conversation with you and Stephanie Reeder on July 9, 2001, it was discussed how this proposed project and another Caltrans project (EA 166051, 166061, 166071) are two separate projects with a different purpose and need and funding cycle. However, to comply with your request, here is additional information on the requested projects to complete your cumulative impact analysis.

- i) Widening and pavement rehabilitation from Hughes Terrace to Fiji Way. Please note that the widening of Lincoln Boulevard ends at approximately 80 meters north of Jefferson Boulevard.
- ii) Intersection improvements at Hughes Terrace, the proposed realigned Teale Street, and Jefferson Boulevard.
- iii) Intersection Improvements at Fiji Way.
- iv) Intersection Improvements at Sepulveda Boulevard. Please note that this location is outside of the coastal zone.

B. Lincoln Boulevard (State Route 1) EA 166051/166061/166071

Chris Flynn reviewed the draft environmental document and submitted comments on February 8, 2001. This project is currently in the design phase.

- i) Widening of Lincoln Boulevard from Jefferson Boulevard to Fiji Way (see Attachment A to show the difference between this project and the one mentioned in 1A).
- ii) Construction of a new bridge over Ballona Creek.
- iii) Replacement of the Culver Boulevard Overcrossing.

C. Culver Boulevard Undercrossing (State Route 90) CDP 5-01-038 EA 1693U1

- i) Extension of State Route 90 over Culver Boulevard.

5-01-147
 Exh. 4
 p 3

B. Extent of Wetland Fill

Please see above discussion on #2.

C. Landscape

There is no landscaping proposed for this project.

D. Elevation

Please see enclosed profile sheets indicating the existing elevation and the elevation after the proposed project. (Attachment D).

E. Existing Vegetation and Analysis of Impacts on Endangered Plants and Animals

Based upon a biological field survey that was conducted on April 25, 2001, the following biological resources were observed in the project impact area:

Species Name (Common)	Location	Native/Non-Native Habitat Association
Crown Daisy <i>Chrysanthemum coronarium</i>	1,3	Native
Red Brome <i>Bromus rubens</i>	1,3	Non-native, invasive
Wild Oats <i>Avena fatua</i>	1,2	Introduced Common, cultivated and waste areas
Casterbean <i>Rincinus communis</i>	1,4	Non-native Coastal sage scrub, waste lands, and lowlands
Barley <i>Hordeum ssp.</i>	1,2,3	Non-native Open areas esp. disturbed sites
Filaree <i>Erodium circuitartium</i>	1,2, 4	Non-native, invasive Open areas
Iceplant <i>Carpobrotus ssp.</i>	2	Non-native, invasive
Wild Radish <i>Raphanus savitus</i>	2,3	Non-native, invasive
Bur Clover <i>Medicago ssp.</i>	3	Found in grassy areas
Sow Thistle <i>Sonchus sp.</i>	3	Abundant, found in disturbed soils
Pineapple Weed <i>Chamomilla suaveolens</i>	3	Found in gardens, plowed fields, along roads
Black Mustard <i>Brassica nigra</i>	4	Non-native
Telegraph Weed <i>Hetrotheca grandiflora</i>	4	Sagebrush scrub, southern oak woodlands and foothill woodlands, disturbed areas
Palm (few) <i>Washington sp.</i>	4	Native Desert springs
Sweet Fennel <i>Foeniculum vulgare</i>	4	Non-native, invasive Disturbed areas, roadsides
California Sagebrush (few) <i>Artemisia californica</i>	4	Native Chaparral, coastal scrub, dry foothills

Note: Location 1 South of Ballona Creek Bridge
 Location 2 South of Jefferson Boulevard to Existing Teale Street
 Location 3 Existing Teale Street
 Location 4 Approach to Hughes Terrace/LMU Drive

There was no evidence of sensitive plant and animal species in the project location. No animal species were observed at the time of the April 25, 2001 survey. In addition, no presence was identified through track and scat surveys. The area of potential impact for this project consists primarily of disturbed grassy roadside berms dominated by non-native, ruderal vegetation.

E. Impact to Views

At the highest elevation along northbound Lincoln Boulevard (as the road descends north of Hughes Terrace), there will be no obstructions to the views to the west or east of Lincoln Boulevard. Similarly in the southbound direction, there will be no negative impacts due to the lack of walls or other obstructions.

F. Water and Wildlife Passage

Currently, Playa Vista is proposing to create a riparian box, to be located between Teale Street and Hughes Terrace. The purpose of the riparian box is to provide water and wildlife passage under the road.

G. Relationship between the Location of the Proposed Project and the Methane Gas Concentrations determined by the City of Los Angeles

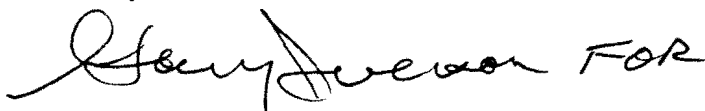
In the study prepared by the City of Los Angeles in March 2001, "City Investigation of Potential Issues of Concern for Community Facilities District No. 4 Playa Vista Development Project," please note that the level of methane concentration for proposed project limits are below 150,000 parts per million by volume. The highest concentration of methane were detected southeast of the intersection of Lincoln Boulevard and Jefferson Boulevard. Based upon the map indicating the areas of methane concentration, the proposed project will not impact the area with the highest level of methane concentration. Levels above 150,000 parts per million by volume are far south east of Jefferson Boulevard beyond the project extent.

H. Suitability as an Escape Route in the Event of a Natural Disaster

State Route 1 is the only continuous north/south route connecting Venice, Marina del Rey, Playa Vista, and Westchester between the Pacific Ocean and Centinela Avenue. The purpose of this project, which proposes to widen Lincoln Boulevard and make roadway and intersection improvements, is to reduce congestion as well as to improve safety. The proposed project will not reduce the capability for commuters to travel along Lincoln Boulevard, since it would conflict with the purpose of the project. In addition, Caltrans strives to protect and enhance transportation throughout the State of California by improving traffic congestion and traffic safety. Natural disasters are unpredictable. Therefore, unforeseen natural events during the construction of this project will be managed to the best of our ability under emergency protocols and standards.

If you have any questions, please contact Stephanie Reeder, District 7 Coastal Commission Liaison at (213) 897-5446.

Sincerely,

A handwritten signature in black ink, appearing to read "Aziz Elattar FOR".

Aziz Elattar, Senior Environmental Planner
Division of Environmental Planning

Attachments:

- A. Diagram of Existing Road/Proposed Road/Caltrans Project 166051, 166061, 166071
- B. Letter from Dr. Edith Read (Psomas and Associates) regarding wetlands along Lincoln Boulevard
- C. Fossil Filter Information from Kristar (manufacturer)
- D. Profile Plans of Lincoln Boulevard

THE URBAN WILDLANDS GROUP, INC.

P.O. BOX 24020, LOS ANGELES, CALIFORNIA 90024-0020, TEL (310) 276-2306

A Review of the Ecological Effects of Road Reconfiguration and Expansion on Coastal Wetland Ecosystems

November 14, 2001

**Travis Longcore, Ph.D.
Catherine Rich, J.D., M.A.**

*Exhibit 5 p1
5-01-184*

S. 01-184
E2 h. 6 + 5
p2

**A Review of the Ecological Effects of
Road Reconfiguration and Expansion
on Coastal Wetland Ecosystems**

Introduction

The importance of coastal wetlands and estuaries to global biodiversity and ecosystem function is well known. In California, only a fraction of the historic extent of these wetlands remain, and it is only the protection afforded by laws such as the California Coastal Act that has reduced and sometimes reversed the loss. Even projects next to wetlands that do not directly involve filling of wetlands can have significant adverse ecological effects. The purpose of this review is to discuss the ecological consequences of expanding and rebuilding road systems within a wetland area. This review focuses on the potential adverse ecological effects of two projects before the California Coastal Commission on November 14, 2001 (Item W12.3/W12.5c and Item W12.5d/12.5e). It is also our intention that the scientific research assembled herein will provide a reference document for the Commission as it considers other similar projects under its jurisdiction.

Several topics pertaining to roads and road construction are discussed. First we consider the consequences of increased artificial night lighting on wetland ecosystems. Second, we discuss the impacts of noise on birds and other wildlife in wetland ecosystems. Third, we review some of the research about roadkill and road-induced fragmentation, and its potential impact on wildlife populations. Fourth, we address the impacts of increased road area on water quality and efficacy of detention basins in mitigating such impacts. Finally, we offer some particular observations unique to the two proposals under consideration.

Artificial Night Lighting

Illumination of the night sky has increased drastically over the past century. Today, more than two-thirds of the population of the United States lives in a location where the Milky Way is no longer visible at night.¹ Despite increasing knowledge about the effects of artificial lighting on human health, astronomical observation, and energy consumption, the ecological consequences of nighttime lighting is not widely known. Despite the lack of widespread incorporation of the effects of lighting into the environmental review process, significant scientific research has been completed that can and should guide policy decisions.

Road construction, expansion, or reconfiguration in the United States almost inevitably involves an increase in nighttime lighting. For road projects proposed by Playa Capital, lighting at the two sites is currently minimal. At the intersection of Culver Boulevard and Jefferson Boulevard only two streetlights are currently functioning (another two are installed, but not operational). At the intersection of Culver Boulevard and Lincoln Boulevard, only a few streetlights are installed under the Culver Boulevard bridge. Consequently, ambient nighttime lighting levels at these

1. Cinzano, P., F. Falchi, and C.D. Elvidge. 2001. The first world atlas of artificial night sky brightness. *Monthly Notices of the Royal Astronomical Society* 000:1-16.

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locations are low compared to the surrounding urban area. The undeveloped portions of the Ballona wetlands are the darkest areas in West Los Angeles. While the staff recommendations for both projects include a condition requiring the lowest possible lighting levels permissible under state and federal law, the projects are nevertheless likely to result in a significant increase in nighttime lighting levels experienced in the environmentally sensitive habitat areas of the Ballona wetlands.

Artificial night lighting can have significant effects on virtually all classes of terrestrial organism. We will discuss the mechanisms and potential results of some of these impacts.

Plants

Light is central to the function and physiology of plants. However, relatively little published information is available about the effects of artificial night lighting on plants in natural settings. One consequence of lighting is to change the duration of light and dark ("photoperiod") experienced by the plant. Many functions may be triggered by photoperiod, including seed germination,² flowering, and leaf loss.³ Some plants will not flower if night length is not sufficiently long.⁴ Trees under streetlights have been observed to retain leaves longer into the fall in temperate climates.⁵ Disruption of plant growth by sodium vapor lights has been recorded in several studies.⁶ These studies do not pertain to wetland plants specifically, but there is no reason to expect that wetlands species would not also be affected by artificial lighting in similar ways.

Aquatic Invertebrates

Artificial lighting affects aquatic invertebrates through modification of photoperiodic behaviors such mating and foraging. In the first experimental study on this topic, Dr. Marianne Moore found that the aquatic zooplankton *Daphnia* exhibited different behaviors in wetlands that had a natural photoperiod and those that were subject to artificial lighting.⁷ She found that *Daphnia* in dark night conditions migrate farther up and down the water column to forage on algae than those exposed to higher ambient light levels. She documents that lakes in urban areas are exposed to over 100 times the light levels of rural lakes, and concludes that this will affect the foraging patterns of *Daphnia* across the lighting gradient. This, she states, is important, because

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2. Edwards, D.G.W., and Y.A. El-Kassaby. 1996. The effect of stratification and artificial light on the germination of mountain hemlock seeds. *Seed Science and Technology* 24:225-235.
 3. Outen, A. 1998. *The possible ecological implications of artificial lighting*. Hertfordshire, UK: Hertfordshire Biological Records Centre.
 4. Campbell, N.A. 1990. *Biology* (2nd ed.). New York: Benjamin Cummings Inc.
 5. Environmental Building News. 1998. Light pollution: efforts to bring back the night sky. *Environmental Building News* 7(8).
 6. Sinnadurai, S. 1981. High pressure sodium street lights affect crops in Ghana. *World Crops* (Nov/Dec):120-122. Cathey, H.M., and Campbell, L.E. 1975. Effectiveness of five vision-lighting sources on photoperiodic control of 22 species of ornamental plants. *J. Am. Soc. Hort. Sci* 100:65-71.
 7. Moore, M.V., S.M. Pierce, H.M. Walsh, S.K. Kvalvik, and J.D. Lim 2000. Urban light pollution alters the diel vertical migration of *Daphnia*. *Proceedings of the International Society of Theoretical and Applied Limnology* in press. Pierce, S.M., and M.V. Moore 1998. Light pollution affects the diel vertical migration of freshwater zooplankton. Abstract, 1998 Annual Meeting of the Ecological Society of America, Baltimore, MD.

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"vertical migration of lake grazers may contribute to enhanced concentrations of algae in both urban lakes and coastal waters. This condition, in turn, often results in deterioration of water quality (i.e. low dissolved oxygen, toxicity, and odor problems)."⁸ If *Daphnia* or other zooplankton do not migrate to the surface of the wetland to forage on algae because light levels are too high, then the whole aquatic food chain is in jeopardy. Because the two projects under consideration are so close to existing wetlands, adverse impacts on aquatic invertebrates in this manner is a distinct possibility.

Terrestrial Invertebrates

Terrestrial invertebrates are similarly affected by artificial night lighting. Many larval forms of arthropods are positively phototactic (e.g., attracted to light, even artificial light).⁹ Artificial lighting results in increased mortality of moths and other nocturnal insects.¹⁰ While the most conspicuous and well-known examples are moths, many types of insects are attracted to artificial lights, including a wide range of orders that are known to be attracted to light sources including lacewings, beetles, bugs, caddisflies, crane flies, midges, hoverflies, wasps, and bush crickets.¹¹ Some insects are attracted to night lighting, while other nocturnal species are stimulated to rest under increased lighting levels as if it were dawn. Low pressure sodium lamps, which provide a yellow light, attract the fewest number of insects.¹² Lighting not only influences nighttime locomotory behavior but can also affect reproductive activities.¹³

While it may seem to be a benefit for diurnal species to be active under streetlights, any gains from increased activity time are offset by increased predation risk. In a study of butterfly larvae, a higher growth rate associated with longer photoperiod (as would be caused by artificial light) resulted in significantly higher predation on the butterfly larvae from the primary parasitoid species.¹⁴ Some bat species are attracted to streetlights where they forage on the gathered

8. Moore, M.V. 2001. Wellesley College Summer Program > Participating Faculty. [Online: <http://www.wellesley.edu/Sumres/faculty/faculty.htm>].
9. Summers, C.G. 1997. Phototactic behavior of *Bemisia argentifolii* (Homoptera: Aleyrodidae) crawlers. *Annals of the Entomological Society of America* 90(3):372-379.
10. Frank, K.D. 1988. Impact of outdoor lighting on moths: an assessment. *Journal of the Lepidopterists' Society* 42(2):63-93. Kolligs, D. 2000. Ecological effects of artificial light sources on nocturnally active insects, in particular on butterflies (Lepidoptera). *Faunistisch-Oekologische Mitteilungen Supplement*(28):1-136.
11. Kolligs, D. 2000. Ecological effects of artificial light sources on nocturnally active insects, in particular on butterflies (Lepidoptera). *Faunistisch-Oekologische Mitteilungen Supplement* 28:1-136. Eisenbeis, G., and F. Hassel 2000. [Attraction of nocturnal insects to street lights - a study of municipal lighting systems in a rural area of Rheinhessen (Germany).] *Natur und Landschaft* 75(4):145-156. Sustek, Z. 1999. Light attraction of carabid beetles and their survival in the city centre. *Biologia* (Bratislava) 54(5):539-551.
12. Frank, K.D. 1988. Impact of outdoor lighting on moths: An assessment. *Journal of the Lepidopterists' Society* 42:63-93. Rydell, J., and H. J. Baagoe. 1996. Street lamps increase bat predation on moths. *Entomologisk Tidskrift* 117:129-135. Kolligs, D. 2000. Ecological effects of artificial light sources on nocturnally active insects, in particular on butterflies (Lepidoptera). *Faunistisch-Oekologische Mitteilungen Supplement*:1-136. Eisenbeis, G., and F. Hassel 2000. [Attraction of nocturnal insects to street lights - a study of municipal lighting systems in a rural area of Rheinhessen (Germany).] *Natur und Landschaft* 75(4):145-156.
13. Tinsmer, J.W., C.L. Meek, and V.L. Wright. 1995. Circadian patterns of oviposition by necrophilous flies (Diptera: Calliphoridae) in southern Louisiana. *Southwestern Entomologist* 20:439-445.
14. Gotthard, K. 2000. Increased risk of predation as a cost of high growth rate: an experimental test in a butterfly. *Journal of Animal Ecology* 69(5):896-902.

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insects.¹⁵ Mercury vapor streetlights especially increase bat predation on moths because the lights interfere with the ability of moths to detect the ultrasonic sound bursts used by bats to locate prey.¹⁶

Amphibians

Artificial night lighting has also been shown to affect the behavior of nocturnal frogs and toads, reducing their visual acuity and ability to consume prey.¹⁷ Amphibians are particular about the light levels in which they will forage, and the crepuscular hours of dusk and dawn are often divided among species specializing in different light levels.¹⁸ If the night does not become sufficiently dark, some species will never forage and will disappear from an area. In salamanders, similar partitioning of foraging times by lighting levels is being researched, and salamander diversity decreases under artificial lighting.¹⁹ Only the species adapted to the lighted conditions can persist. Increased night lighting adjacent to wetlands can thereby reduce the number of species of amphibians that are present.

Fish

Fish respond to artificial light at night in varying ways. Some species are attracted to light sources, so much so that lights are used to lure fish up ladders to bypass dams.²⁰ Other fish will not forage in artificially lit areas or on nights with a full moon.²¹ Seatrout in the United Kingdom provide an example. A tennis club built a lighted court adjacent to a productive seatrout pool on the Little Cowie River south of Aberdeen, Scotland. Seatrout are normally caught at night, especially on dark nights, when they forage at lighting levels between 0.5 and 0.2 lux. Foraging at greater illumination exposes the fish to greater predation. With the tennis court illuminated next to the river, the fish were no longer active in that pool. The local angling association ultimately took the tennis club to court and was successful in having the lighting declared a "light nuisance."²² The effects of artificial lighting on juvenile and adult fish in the

15. Blake, D., A.M. Hutson, P.A. Racey, J. Rydell, and J.R. Speakman. 1994. Use of lamplit roads by foraging bats in southern England. *Journal of Zoology* (London) 234:453-462.
16. Svensson, A.M., and J. Rydell. 1998. Mercury vapour lamps interfere with the bat defence of tympanate moths (*Operophtera* spp.; Geometridae). *Animal Behaviour* 55:223-226.
17. Buchanan, B.W. 1993. Effects of enhanced lighting on the behaviour of nocturnal frogs. *Animal Behaviour* 45(5):893-899.
18. Jaeger, R.G., and J.P. Hailman. 1976. Phototaxis in anurans: relation between intensity and spectral responses. *Copeia* 1976:352-407. Hailman, J.P., and J.G. Jaeger. 1976. A model of phototaxis and its evaluation with anuran amphibians. *Behaviour* 56:289-296. Hailman, J.P. 1984. Bimodal nocturnal activity of the western toad (*Bufo boreas*) in relation to ambient illumination. *Copeia* 1984:283-290.
19. Wise, Sharon. 2001. Personal communication.
20. Larinier, M., and S. Boyer-Bernard 1991. Smolt's downstream migration at Poutes Dam on the Allier River: use of mercury lights to increase the efficiency of a fish bypass structure. *Bulletin Francais de la Peche et de la Pisciculture* 323:129-148. Haymes, G.T., P.H. Patrick, and L.J. Onisto. Attraction of fish to mercury vapor light and its application in a generating station forebay. *Internationale Revue der Gesamten Hydrobiologie* 69:867-876.
21. Contor, C.R., and J.S. Griffith 1995. Nocturnal emergence of juvenile rainbow trout from winter concealment relative to light intensity. *Hydrobiologia* 299(3):179-183.
22. Stonehaven & District Angling Association. nd. Seatrout v light nuisance. [Online: <http://www.sana.org.uk/light.htm>].

Ballona wetlands has not been studied, but lighting may have important effects on behavior and ultimately affect the quality of the wetlands as fish habitat.

Birds

Artificial lighting affects behavior of birds in many ways. One of the most well-known examples is the attraction of migrating birds to tall, lighted structures (i.e., towers, office buildings, bridges), where they often die. While effects on migrating birds are possible from street lighting in some circumstances, other impacts are more likely. Lighting can affect bird species composition. For example, American crows (*Corvus brachyrhynchos*) roost in areas with high nighttime lighting levels,²³ where artificial lighting allows them to reduce predation from owls.²⁴ Crows are aggressive, and artificially increased population levels can be detrimental to other native bird species. Lighting can affect singing and foraging times for many species.²⁵ A review of the impact of artificial light on waterfowl records numerous instances of shorebirds foraging or roosting under artificial lights.²⁶ There is not yet information about whether these changes in behavior increase or decrease mortality.

Mammals

Finally, artificial lighting has significant effects on mammals. Large predators such as wolves and mountain lions, while clearly not an issue at the Ballona wetlands, are reported to avoid illuminated areas.²⁷ This may be important when addressing impacts of development that might eliminate landscape connections between coastal wetlands and other large natural areas. More likely of issue at Ballona wetlands is the effect of lighting on bat species. Some faster-flying bat species congregate at streetlights, while slower-flying species avoid them.²⁸ For fast species the agglomerations of insects at street lights are a source of food, but for slower species the increased food availability is offset by increased risk of predation by owls.

From the scientific literature on the effects of artificial lighting, we conclude that significant adverse impacts occur when the diurnal patterns of light and dark are disrupted. Because the

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23. Gorenzel, W.P., and T.P. Salmon. 1995. Characteristics of American Crow urban roosts in California. *Journal of Wildlife Management* 59(4):638-645.
 24. Brody, J.E. 1997. The too-common crow is getting too close for comfort. *New York Times*, May 27. Miller, R. 1998. Flocks of crows making urban areas home, so look out below. *The News-Times*, December 28. [Online at: <http://www.newstimes.com/archive98/dec2898/lcd.htm>].
 25. Bergen, F., and M. Abs. 1997. Etho-ecological study of the singing activity of the blue tit (*Parus caeruleus*), great tit (*Parus major*) and chaffinch (*Fringilla coelebs*). *Journal fuer Ornithologie* 138(4):451-467. Derrickson, K.C. 1988. Variation in repertoire presentation in northern mockingbirds. *Condor* 90(3):592-606. Hoetker, H. 1999. What determines the time-activity budgets of avocets (*Recurvirostra avosetta*)? *Journal fuer Ornithologie* 140(1):57-71. Frey, J.K. 1993. Nocturnal foraging by scissor-tailed flycatchers under artificial light. *Western Birds* 24(3):200. Hill, D. 1992. *The impact of noise and artificial light on waterfowl behavior: a review and synthesis of available literature*. British Trust for Ornithology Research Report No. 61.
 26. Hill, D. 1990. *The impact of noise and artificial light on waterfowl behaviour: a review and synthesis of the available literature*. British Trust for Ornithology Research Report No. 61.
 27. Beier, P. 1995. Dispersal of juvenile cougars in fragmented habitat. *Journal of Wildlife Management* 59:228-237.
 28. Rydell, J., and H.J. Baagoe. 1996. Bats & streetlamps. *Bats* 14(4):10-13.

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proposed road improvement projects at the Ballona wetlands would trigger the installation of much higher lighting levels, such impacts will occur as a result of the project. Given this consequence, we believe that it would be prudent to fully explore the options for not lighting these intersections prior to approving these development permits. To make the finding that the increased lighting will not cause an adverse effect on the Ballona wetlands or other environmentally sensitive habitat areas, it is necessary to fully describe the lighting of the proposed project, and to provide measures to mitigate the impacts caused by it.

No state or federal law requires lighting of either intersection. However, if a roadway lighting system is included, failure to meet a voluntary national standard may result in increased liability for the jurisdiction. The standard is not compulsory, and does not weigh the effects of light on ecosystems in its formulation.²⁹ Therefore the Commission is free to impose lighting level standards without danger of conflicting with state or federal law. We suggest that the project be conditioned so that illuminance levels experienced by environmentally sensitive habitat areas surrounding the proposed projects are not increased throughout the life of the project. This performance objective could be achieved through a combination of lighting design, low (<3 feet) shields of native vegetation, and a mandatory inspection and maintenance regime for any lighting system.

Noise Impacts on Birds and Wildlife

Roads can exert a profound effect on birds and other wildlife through the production of noise. Two projects before the Commission would reconfigure an existing intersection, widen a stretch of road, and add a connector road. This will result in an increase in the noise levels experienced by wildlife within the Ballona wetlands. New road construction and road widening expands the area subjected to elevated sound levels. Widening Culver Boulevard will allow traffic to travel faster, which produces louder road noise.

Dutch scientists have conducted extensive research on the effect of road noise on birds. Their research shows that the breeding density of many species is depressed near roads. The research showed that up to a certain noise level, which differs for each species, no decrease occurs. Once the level is attained, called the "threshold," breeding bird density decreases dramatically.³⁰ The decreased density over the area with noise greater than the threshold level ranges from 30% to 100% and is known as the "decrease factor."³¹ These two variables, the threshold value and the decrease factor, describe the impact of noise on breeding birds. For bird species similar to those found in the Ballona wetlands, the threshold level for decreased density is 43–60 dB(A).³²

29. Standard Practice Committee of the IESNA Roadway Lighting Committee. 2000. American national standard practice for roadway lighting (ANSI/IESNA RP-8-00). Illuminating Engineering Society of North America, New York, NY.

30. Reijnen, R., R. Foppen, C. ter Braak, and J. Thissen. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32:187–202.

31. *Id.* at 192.

32. Reijnen, R., R. Foppen, and H. Meeuwse. 1995. The effects of traffic on the density of breeding birds in Dutch agricultural grasslands. *Biological Conservation* 75(1996): 255–260.

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Two explanations are suggested for the decreased abundance of breeding birds at elevated noise levels. First is the disruption of vocal communication. Male birds are perhaps unable to attract females when their songs cannot be heard. A complementary hypothesis is that birds avoid noisy areas because they are stressful.³³ Increased stress because of difficult communication leads to an increase in emigration (birds leaving the area) and decrease in reproduction³⁴

Detrimental effects of road noise are recorded for many species of wetland-associated birds. Of particular concern at the Ballona wetlands is Belding's savannah sparrow, a state-listed endangered species. Noise from the project could have a significant impact on this and other bird species. In studies of wetland birds (lapwing, black-tailed godwit, redshank), a zone of decreased density of 500–600 m was found for a rural road, and 1600–1800 m for a busy highway.³⁵ The zone increases with the width of the road and the volume and speed of traffic.

The body of research on the effects of noise on vertebrates shows that chronic noise, even at low levels, is associated with elevated stress hormone levels, higher blood pressure, faster heart rates, and other physiological effects.³⁶ As a result, birds, mammals, and other vertebrates may show anatomical differences (smaller body size, enlarged adrenal glands) from prolonged exposure to noise.

The potential of road noise to render less useful otherwise productive wetland habitats exists for any reconfiguration or construction project. If roads are widened, or redesigned to accommodate traffic flow at higher speeds, an increased area will be exposed to chronic elevated noise levels. These effects should be carefully considered when such projects are proposed close to wetland and other natural habitats.

Roadkill

Another direct pathway of road effects is through direct mortality of wildlife. The taxonomic breadth of deaths from collisions with vehicles is wide and well documented.³⁷ In wetland situations, amphibians and small mammals are particularly vulnerable. The percentage of individuals in a vertebrate population killed on roads increases with the width of the road, and with the number of vehicle trips on the road.³⁸ So even in instances where roads already exist,

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33. Illner, H. 1992. Effect of roads with heavy traffic on grey partridge (*Perdix perdix*) density. *Gibier Fuane Sauvage* 9:467–480.
 34. Reijnen, R., R. Foppen, and G. Veenbaas. 1997. Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation* 6:567–581.
 35. van der Zande, A.N., W.J. Keurs, and W.J. van der Weijden. 1980. The impact of roads on the densities of four bird species in an open field habitat — evidence for a long distance effect. *Biological Conservation* 18:299–231.
 36. Manci, K.M., D.N. Gladwin, R. Villella, and M.G. Cavendish. 1988. *Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis*. U.S. Fish and Wildlife Service National Ecology Research Center, Ft. Collins, CO. NERC-88/29. 88 pp.
 37. See reviews in Groot Bruderink, G.W.T.A., N.N. Beyer, and L.P. Franson. 1986. Ungulate traffic collisions in Europe. *Conservation Biology* 10:1059–1076, and Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14:18–30.
 38. Carr, L.W., and L. Fahrig. 2001. Effect of road traffic on two amphibian species of differing vagility. *Conservation Biology* 15:1071–1078. Hels, T., and E. Buchwald. 2001. The effect of road kills on amphibian

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widening from two lanes to four can sever population connections between habitats bisected by the road. In Area C at Playa Vista, which is bisected by Culver Boulevard, Audubon's cottontails are still present. Increasing Culver Boulevard from two to four lanes, combined with cumulative impacts of separate projects widening Lincoln Boulevard, may result in an isolation of these populations. This would increase the risk that they will be extirpated from one or more areas and decreases the probability of recolonization.

Birds are also vulnerable to roadkill. Birds of prey are often killed along roads where they have come to forage in roadside vegetation. One of the authors of this report observed a roadkilled Barn Owl along Culver Boulevard in the project site in December 1996. The specimen was collected and deposited in the Natural History Museum of Los Angeles County. Increasing the width of Culver Boulevard will increase direct mortality, and further fragment the open space of Area C.

Water Quality and Detention Basins

Increased road area generates an increase in five types of chemicals in the surrounding environment. Trombulak and Frissell identify and discuss the effects of these pollutants, heavy metals, salt, organic molecules, ozone, and nutrients.³⁹ While many of these may have impacts to water quality, they have other detrimental impacts in the environment. Often effects of road pollution are only analyzed for water quality effects in a receptor water body downstream, not for the effects to the terrestrial communities adjacent to the road. Heavy metals accumulate in the tissues of plants and animals up to 200 m away from roads.⁴⁰ Deicing salts are particularly harmful to plants, but are not an issue in southern California. Complex organic molecules, such as polycyclic hydrocarbons, accumulate along roads and are toxic to many organisms. For example, these compounds accounted for toxicity of water along a road in Britain to aquatic invertebrates.⁴¹ Roads increase atmospheric ozone, which contributes to respiratory problems in mammals just as it does in humans. Finally, roads are sources of excess nutrients for nearby environments. One such nutrient is nitrogen, which is released during combustion of fossil fuels. Even very low levels of excess nitrogen can be affect aquatic vertebrates such as amphibians.

Nitrates and nitrites have been implicated in global amphibian declines. The pathways of effect are many. Increased nitrates influence prey distribution and behavior.⁴² Rouse *et al.* review laboratory studies that report lethal and sublethal effects of nitrates on amphibians at

populations. *Biological Conservation* 99:331-340. Lode, T. 2000. Effect of a motorway on mortality and isolation of wildlife populations. *Ambio* 29:163-166.

39. Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14:18-30.

40. Id.

41. Maltby, L. A.B.A. Boxall, D.M. Farrow, P. Calow, and C.I. Betton. 1995. The effects of motorway runoff on freshwater ecosystems. 2. Identifying major pollutants. *Environmental Toxicology and Chemistry* 14:1093-1101.

42. Watt P.J., and R.S. Oldham. 1995. The effect of ammonium nitrate on the feeding and development of larvae of the smooth newt, *Triturus vulgaris* (L.), and on the behaviour of its food source, *Daphnia*. *Freshwater Biology* 33:319-324. Rouse, J.D., C.A. Bishop, and J. Struger. 1999. Nitrogen pollution: an assessment of its threat to amphibian survival. *Environmental Health Perspectives* 107:799-803.

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concentrations equaling 2.5–100 mg/L.⁴³ Laboratory studies have shown significant larval mortality at 1 mg/L, which meets safe drinking water standards, with all four species studied showing significant effects at 2 mg/L.⁴⁴ Studies often show larval deformities and altered metamorphosis phenology in response to nitrogen pollution.⁴⁵ In another effect pathway, stress, such as that induced by exposure to sublethal nitrogen pollution, is hypothesized to weaken amphibian immune systems, which makes individuals vulnerable to infection by pathogens⁴⁶ such as bacteria or chytrid fungi.⁴⁷ Increased nitrogen loading in wetlands and constructed detention basins may be a significant detrimental byproduct of the proposed road construction and expansion.

Mitigation for the increased pollution created by the road widening of Culver Boulevard is proposed in the form of a wetland detention basin or bioswale. It is argued that the quality of stormwater reaching Ballona Creek will be better after project implementation. However, even if the water flowing into Ballona Creek is cleaner, there will still be more pollution in the Ballona wetlands ecosystem as a result of the project. The bioswale is designed to “clean” the water that flows into it. However, while the pollutants may be kept out of the runoff flowing out of the swale, many are retained within the bioswale, where they can affect plants and wildlife. Even though bioswales may provide habitat for birds and other wildlife, they are by design polluted habitats. So while they may mitigate water quality issues, they do not minimize or even reduce the amount of pollution experienced by plants and wildlife.

The ability of bioswales to remove pollutants from stormwater is also not perfect. In a very recent study of bioswales constructed by Caltrans in San Diego similar to that proposed at Culver Boulevard, performance was monitored for three years.⁴⁸ Suspended solids experienced an average load removal of 73%. Nitrogen forms were reduced by only 17% and phosphorus was reduced by 38%. Between 61–75% of the total concentration heavy metals was reduced, while only 16–44% of dissolved metals was reduced. Concentrations of complex hydrocarbons from

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43. Rouse, J.D., C.A. Bishop, and J. Struger. 1999. Nitrogen pollution: an assessment of its threat to amphibian survival. *Environmental Health Perspectives* 107:799–803.
 44. Marco, A., C. Quilchano, and A.R. Blaustein. 1999. Sensitivity to nitrate and nitrite in pond-breeding amphibians from the Pacific northwest, USA. *Environmental Toxicology and Chemistry* 18:2836–2839.
 45. Xu, Q., and R.S. Oldham. 1997. Lethal and sublethal effects of nitrogen fertilizer ammonium nitrate on common toad (*Bufo bufo*) tadpoles. *Archives of Environmental Contamination and Toxicology* 32:298–303.
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 - Hecnar, S.J. 1995. Acute and chronic toxicity of ammonium nitrate fertilizer to amphibians from southern Ontario. *Environmental Toxicology and Chemistry* 14:2131–2137.
 46. Carey, C. 1993. Hypothesis concerning the causes of the disappearance of boreal toads from the mountains of Colorado. *Conservation Biology* 7:355–362.
 47. Berger, L., R. Speare, P. Daszak, D.E. Green, A.A. Cunningham, C.L. Goggin, R. Slocombe, M.A. Ragan, A.D. Hyatt, K.R. McDonald, H.B. Hines, K.R. Lips, G. Marantelli, and H. Parkes. 1998. Chytridiomycosis causes amphibian mortality associated with population declines in the rain forests of Australia and Central America. *Proceedings of the National Academy of Sciences of the United States of America* 95:9031–9036.
 - Lips, K.R. 1999. Mass mortality and population decline of *Rhombophryne* at an upland site in western Panama. *Conservation Biology* 13:117–125.
 48. Taylor, S.N., L. Hanson, and C. Beil. 2001. Assessment of costs and benefits of detention for water quality enhancement. Paper read at American Society of Civil Engineers World Water & Environmental Resources Congress 2001, Orlando, FL, May 20–24, 2001.

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diesel and oil were only reduced by 3% and 25% respectively, while fecal coliform levels were 200% *higher* in water flowing out of the detention basin than flowing in. The basins studied represent the state of the art and were well maintained during the study. Results such as this in the scientific literature raise legitimate concerns about the reliance on detention basins for stormwater treatment. It further brings into question the assertion by the applicant that water flowing into Ballona Creek will be cleaner after the project than before. If previous experience is to be a guide, it would be reasonable to expect that following expansion of Culver Boulevard significantly more pollutants (diesel, oil, dissolved heavy metals, fecal coliform bacteria) will flow into Ballona Creek than before. The evidence from the 2001 study contradicts the statement by the applicant's consultant (repeated in the staff report) that levels of coliform bacteria can be reduced by over 50% in water quality basins.

Other Issues

The special conditions for the project widening Culver Boulevard include a requirement for the use of Integrated Pest Management ("IPM") in landscape and bioswale areas. Suggested methods include the release of toads, garter snakes, and predatory insects. It is not advisable to introduce more exotic species into a system already so burdened by exotics. The use of predators as biocontrol agents is controversial in the scientific community, and impacts on non-target species must be carefully considered. Only introduction of species native to the Ballona wetlands should be allowed as part of the Integrated Pest Management program.

The recommendations for the IPM also include "trapping manually." While it is unclear what species would be trapped, the target would presumably be pocket gophers. Burrowing mammals are often removed in the maintenance of bioswales.⁴⁹ However, gophers have profound ecosystem benefits, including increased humus content, mineral availability, soil moisture, and friability,⁵⁰ all of which are beneficial to native plant communities. They are also prey for raptors. While burrowing mammals can present a challenge to the establishment of vegetation, their presence increases the long term viability of the ecosystem.

Conclusion

Wetlands are critically important to ecosystem function and the maintenance of biodiversity. Our understanding of the impacts of development of roads near and through wetlands provides more than ample evidence to argue for caution when weighing the need for a project against the impact the resource. Unfortunately, the environmental review process does not always keep pace with scientific understanding. The proposed projects are mitigations for traffic impacts

49. Id.

50. Dalquest, W.W. and V.B. Schaffer. 1942. Origin of mima mounds in western Washington. *Journal of Geology* 50:68-84. Ellison, L. and C.M. Aldous. 1952. Influence of pocket gophers on vegetation of subalpine grassland in central Utah. *Ecology* 33:177-186. Hansen, R.M. and M.J. Morris. 1968. Movement of rocks by Northern Pocket Gophers. *Journal of Mammalogy* 49:391-399. McGinnis, W.J. 1960. Effect of mima-type microrelief on herbage production of five seeded grasses in western Colorado. *Journal of Range Management* 13:231-239. Mielke, H.W. 1977. Mound building by pocket gophers (*Geomysidae*): their impact on soils and vegetation in North America. *Journal of Biogeography* 4:171-180. Ross, B.A., J.R. Tester, and W.J. Breckenridge. 1968. Ecology of mima-type mounds in northwestern Minnesota. *Ecology* 49(1):172-177.

5-01-184
1514415
p.12

evaluated in an Environmental Impact Report prepared nearly a decade ago. As is usually the case, the environmental impacts of the mitigation measures themselves were not sufficiently evaluated. Furthermore, increased scientific knowledge during the intervening years leads to the conclusion that resource agencies should be more, not less, restrictive when approving roads in and near wetlands.

This review has shown several pathways through which reconfigured and expanded roads through the Ballona wetlands ecosystem can impact environmentally sensitive habitat areas and the wildlife dependent on them. These pathways include increased light, noise, roadkill and pollution. We conclude that these impacts will still occur if the projects are approved as proposed and conditioned by staff and would conflict with the resource protection statutes of the California Coastal Act.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO, SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610

EXHIBIT NO. 6 p1
APPLICATION NO. 5-01-184
information



Let your power!
energy efficient!

January 16, 2002

Pam Emerson
California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

RECEIVED
South Coast Region
JAN 15 2002
CALIFORNIA

RE: Submittal of Additional Information for LA-1 Lincoln Blvd. Phase 1 (CDP 5-01-184)

The following information is in response to a request for additional information on January 11, 2002.

1. Verify if there is a shoulder on the southbound side of Lincoln between Jefferson and LMU Drive (former Hughes Terrace) and the number of lanes in each direction

ANSWER: There will be a shoulder on the southbound side between Jefferson and LMU Drive, varying in width. Based on the pavement delineation plans in the 8/00 Project Report (translating from metric), the shoulder width varies from 4' just south of Jefferson to 9' throughout most of the stretch (from south of Jefferson to south of Teale Street), then narrowing between south of Teale Street and LMU Drive.

Phase 1 includes four lanes in both directions between north of Hughes Terrace and 624 feet north of Jefferson Boulevard, then tapering down to three lanes on either side. Specifically, as described in the 8/00 Project Report and the 12/01 "Traffic Need and Purpose" report:

The Route 1 Phase 1 improvement project will improve Route 1 to provide four northbound and three southbound through lanes at Hughes Terrace, four through lanes in each direction between north of Hughes Terrace and north of Jefferson Boulevard, three through lanes in each direction across the Ballona Creek bridge and beneath the Culver Boulevard overcrossing, and a third northbound through lane between the Culver Boulevard ramp and Fiji Way. The Project also includes improvements and additional turn lanes at the Route 1 intersections with Hughes Terrace, realigned Teale Street, Jefferson Boulevard, and the Culver Boulevard ramp.

2. Where will stockpiling take place? Where will the trucks be parked?

ANSWER: Stockpiling and placement of equipment will be within existing and proposed right of way.

3. Lincoln is designed as a super-major highway, however, there is no bicycle or pedestrian access.
 - a. Specifically, there has been no work on compatibility with pedestrian access

ANSWER: The Ballona Creek bike trail crosses beneath the Route 1 Project at Ballona Creek. The Project improvements will not adversely affect access to the bike trail. Although not a part of the Project itself and not within the Route 1 right-of-way, it should be noted that Playa Vista will be constructing an off-road bike path along the east side of Route 1 between Hughes Terrace and Bluff Creek Drive, from which point bike lanes will

Exh. 6A 6p2

travel along Bluff Creek Drive and Playa Vista Drive to connect with the Ballona Creek bike trail.

The Project will provide paved shoulders along both sides of Route 1 (ranging in width from four feet at intersections to eight to nine feet between intersections) that can be utilized by bicyclists traveling along Route 1 through the Project area.

The Route 1 Phase 1 Project includes construction of ADA-compliant sidewalks along both sides of Route 1 in the vicinity of the Jefferson Boulevard intersection and along the east side of Route 1 south of Jefferson Boulevard. Although sidewalks are not currently provided in the subject section of Route 1, the sidewalks will be constructed to connect to the existing sidewalk system in the Westchester area to the south to support the future urbanized nature of the area through which the Project passes. Handicapped access ramps will be provided at each intersection.

The Project does not include construction of a continuous sidewalk along the west side of Route 1 south of Jefferson Boulevard since it was anticipated that a pedestrian walk would be provided outside of the highway right of way as part of the separate adjacent freshwater marsh restoration project. However, at-grade pedestrian access across Route 1 will be possible via crosswalks at the signalized intersections of Route 1 at Hughes Terrace, Teale Street, Jefferson Boulevard, and Fiji Way, and concrete sidewalks will be provided along the west side at these locations to provide pedestrian refuge at bus stops in the southbound direction.

At such future time as pedestrian pathways are provided in the freshwater marsh area, it would be possible to connect these with the sidewalks and crosswalks to be provided as part of the Project.

b. The Certified Land Use Plan requires a dedicated area for transit.

ANSWER: With completion of the Project, bus stops will continue to be located along Route 1 at Hughes Terrace, Teale Street, and Jefferson Boulevard. Although the Project does not include construction of a continuous sidewalk along the west side of Route 1, signalized crosswalks and concrete sidewalks will be provided along the west side at these locations to provide pedestrian refuge at bus stops in the southbound direction. Buses would stop in the curb lane; no bus pull-outs would be provided (they are typically considered undesirable by transit agencies).

Although not a part of the Route 1 improvement project, it should be noted that Playa Capital, the Playa Vista developer, is preserving right-of-way along the eastern side of Route 1 within the project vicinity for potential future use as a transit right-of-way.

c. There is no interface to the Playa Vista fresh water marsh, especially to their walkway for those people who would like to look at the marsh.

ANSWER: See Response 3a.

4. Compatibility to adjacent land use.

ANSWER: Lincoln Boulevard is a primary traffic corridor throughout areas to both the north and south of the Project area. The commercial land uses fronting Lincoln

Boulevard in Marina del Rey to the north and Westchester to the south are primarily auto-oriented uses.

- a. Venice and Santa Monica have storefronts, however, we are proposing a high speed road in between these two cities.

- (i) Narrowed the road and added landscaping and a bike lane

ANSWER: The proposed Project is needed to relieve traffic congestion and improve safety. Route 1 is a major north/south thoroughfare linking Santa Monica, Venice, Marina del Rey, Playa del Rey, Westchester, and LAX. Because of the irregularly shaped coastline and physical barriers such as LAX airport, Marina del Rey, and the environmentally sensitive wetlands, Route 1 is the only primary north-south coastal arterial through the study area. This emphasizes the importance of Route 1 as a regional and local access traffic carrier.

A primary goal of the Project is to mitigate existing congestion along Route 1 in the project area as well as future congestion anticipated from approved future development and regional traffic growth. The proposed Project is a response on the part of Caltrans and other transportation agencies to the degree of crowding motorists face on Route 1.

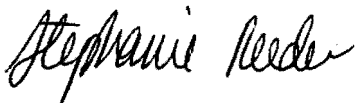
- (ii) Maintained the current design and add an adjacent corridor, including a bike lane, jogging trail and vegetation

ANSWER: It should be noted that parallel bicycle facilities will be provided within the adjacent Playa Vista project, including an off-road bike path along the east side of Route 1 between Hughes Terrace and Bluff Creek Drive, from which point bike lanes will travel along Bluff Creek Drive and Playa Vista Drive to connect with the Ballona Creek bike trail.

5. Wetland Fill. The opponents are claiming that wetlands are present at the toe of slope adjacent to the freshwater marsh.

ANSWER: There are no wetlands that will be impacted by the proposed project as previously evaluated by Caltrans biologists and Coastal Commission biologist.

Sincerely,



for Aziz Lattar, Senior
Division of Environmental Planning

Exhibit 6

P3

5-01-184

Supplement to Permit Application Freshwater Wetland System No. 5-91-463

Submitted by
Maguire Thomas Partners-Playa Vista
on behalf of
the Ballona Wetland Committee
June 19, 1991

Maguire Thomas Partners-Playa Vista on behalf of the Ballona Wetland Committee (the Applicants) filed as of Monday, June 17, 1991, the above referenced permit application (the Application). The information presented at pages 40 through 43 of the cover letter which accompanied the Application and at pages I-10 through I-15 of Attachment 7 to the Application did not include a description of a berm between the eastern edge of the freshwater marsh and Lincoln Boulevard in order to contain the marsh waters during flood events and to accommodate Lincoln Boulevard drainage. Likewise, the information contained at page II-13 of Attachment 7 to the Application did not describe the installation of a clay liner as part of the design of the Riparian Corridor. The supplemental information is provided below.

The Eastern Berm of the Freshwater Marsh Adjacent to Lincoln Boulevard

Project Description

A berm will be constructed along the east side of freshwater marsh adjacent to Lincoln Boulevard to contain water within the freshwater marsh to prevent flooding of Lincoln Boulevard and

- 1 -

portions of Area D during major storm events and to provide drainage.

The berm will contain the waters of one-year or greater storm events when the freshwater marsh will fill to an elevation of +8 feet MSL (mean sea level). In contrast, Lincoln Boulevard adjacent to the freshwater marsh is mostly at an elevation of between +6.5 feet MSL and +7.5 feet MSL, steeply rising at the most southerly edge of the freshwater marsh to nearly +30 feet MSL. The berm would be constructed between the freshwater marsh and the lower portions of Lincoln Boulevard in order to address this problem and to accommodate Lincoln Boulevard drainage. Since the City of Los Angeles requires 3 feet of freeboard over maximum water heights, the berm would be constructed to an elevation of +11 feet MSL.

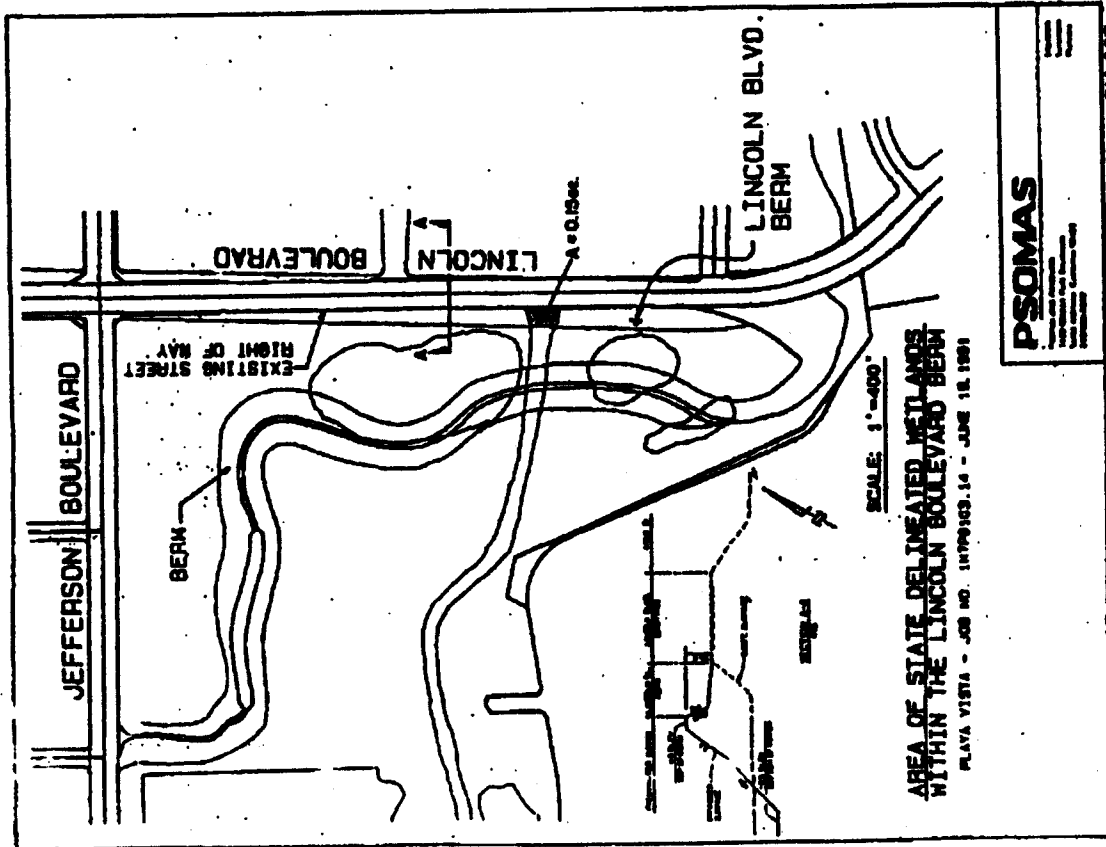
This supplement amends the Application to request permit authority for the construction of the eastern berm for the freshwater marsh adjacent to Lincoln Boulevard. The berm will be approximately 2,300 feet long and cover approximately 2.5 acres. It would require approximately 10,000 to 12,000 cubic yards of fill. The slope of the berm to the existing grade of Lincoln Boulevard would be approximately 2:1 to 3:1. As seen from existing Lincoln Boulevard, the completed berm would vary in height from 0 to 4 feet. The eastern slope of the berm will be planted with appropriate grass species and maintained. (See Figure 1).

Construction of the berm would require the filling of an approximately 0.15 acre State delineated wetland parcel. This is the same 0.15 acre wetland parcel, described on pages 40 through 43 of the cover letter of the Application and on pages I-10 through I-15 of Attachment 7 in the Application, which would be filled by the proposed widening of Lincoln Boulevard as called for in the Ballona Land Use Plan. The widening of Lincoln Boulevard would be subject to a future Coastal Development Permit

- 2 -

EXHIBIT NO. 7 p1
APPLICATION NO. 5-01-184
Previous Fill

5-91-463
application



application. The description in the cover letter and Application must be changed, as described here, because it will be necessary to fill 0.15 acre wetland parcel in conjunction with construction of the eastern berm of the freshwater marsh.

If required by an approved Local Coastal Plan, Lincoln Boulevard may be raised and widened to accommodate 8 lanes of traffic with accompanying turn lanes, medians, shoulders and pedestrian walkways. It is probable that some portion of such improvements may be located upon the eastern berm. The timing, design and precise location of any such improvements remains uncertain, however, and if required, would be the subject of a future Coastal Development Permit application.

The effect of this amendment to the Application is one of timing only. The total number of wetland acres to be converted to uplands by the Playa Vista project remains unchanged at 18.36 acres (based on Wetland Research Associates' 1991 delineation). See Appendix 3 to the cover letter of the Application. The Application as herein amended now seeks permit authority for the right to fill a total of 2.89 acres for the freshwater marsh berm -- 2.74 acres of wetlands for the construction of the western berm of the freshwater marsh and 0.15 acres of lands for the eastern berm of the freshwater marsh.

Description of Wetlands to be Filled

The 0.15 acres of wetlands to be filled are all freshwater wetlands located within the Centinela Ditch. The Centinela Ditch contains a mix of freshwater reeds. Cattails (*Typha domingensis*) are present and there are large, dense patches of umbrella sedge (*Cyperus arifolius*).

Exhibit 8 5.01.1841
related Corps Permit

intersection of Lincoln and Jefferson Boulevards. (See attached Figure 1). This area of uplands would be available for infrastructure improvements that may be required by public agencies with jurisdiction. If so much infrastructure is required, this 0.3 acre parcel will not be developed, but rather maintained as additional upland habitat and buffer between Lincoln Boulevard and the freshwater marsh.

2.7 ACRES ADDITIONAL MITIGATION REQUESTED

Certification of an additional approximately 2.7 acres of wetland mitigation is requested, increasing the total certification of mitigation from 21.34 acres to 24.04 acres. The additional wetland mitigation certification would consist of two categories: 0.3 acre for the freshwater wetlands berm for which authorization to fill is requested above, and 2.4 acres for the future widening and realignment of Culver Boulevard.

The widening and realignment of Culver Boulevard would require the fill of approximately 2.4 acres of delineated wetlands. (See attached Figure 2). The Ballona LUP calls for the widening and realignment of Culver Boulevard and the Settlement Agreement of the lawsuit filed by the Friends of Ballona Wetlands and others against the previous proposed development of the Playa Vista property requires the widening and realignment of Culver Boulevard as an alternative to constructing an extension of Palmsouth Avenue through the wetlands. A permit to fill these 2.4 acres will be sought in a later application.

By including these additional 2.7 acres for wetlands mitigation certification, the total fill for which mitigation is sought becomes 24.04 acres. Mitigation for this fill would be provided by the 51.1-acre freshwater wetlands system. A report prepared by Dr. Noel Davis and submitted along with the applicant's Response to Comments shows that this freshwater wetlands system would provide an excess of wetland acres and values over those proposed for filling including the additional 2.7 acres now proposed for mitigation including the additional certification of the Ballona Freshwater Wetlands System. Biological value of the Ballona Freshwater Wetlands System, Chambers Group (July, 1991).

SUMMARY

This request for modification of the permit application seeks authorization for an additional 0.3 acre of fill for the freshwater wetlands berm, a revision of the freshwater wetlands system to 51.1 acres from 50 acres, and certification of mitigation for 2.7 additional acres of fill, all but 0.3 acre of which must be authorized for fill by future permit applications.

We are sending copies of this permit modification to all parties who commented on this public notice.
Sincerely,

John T. McAllister

Enclosures

cc: Mr. Liz Varabegan
All those commenting on Public Notice

5.61.184

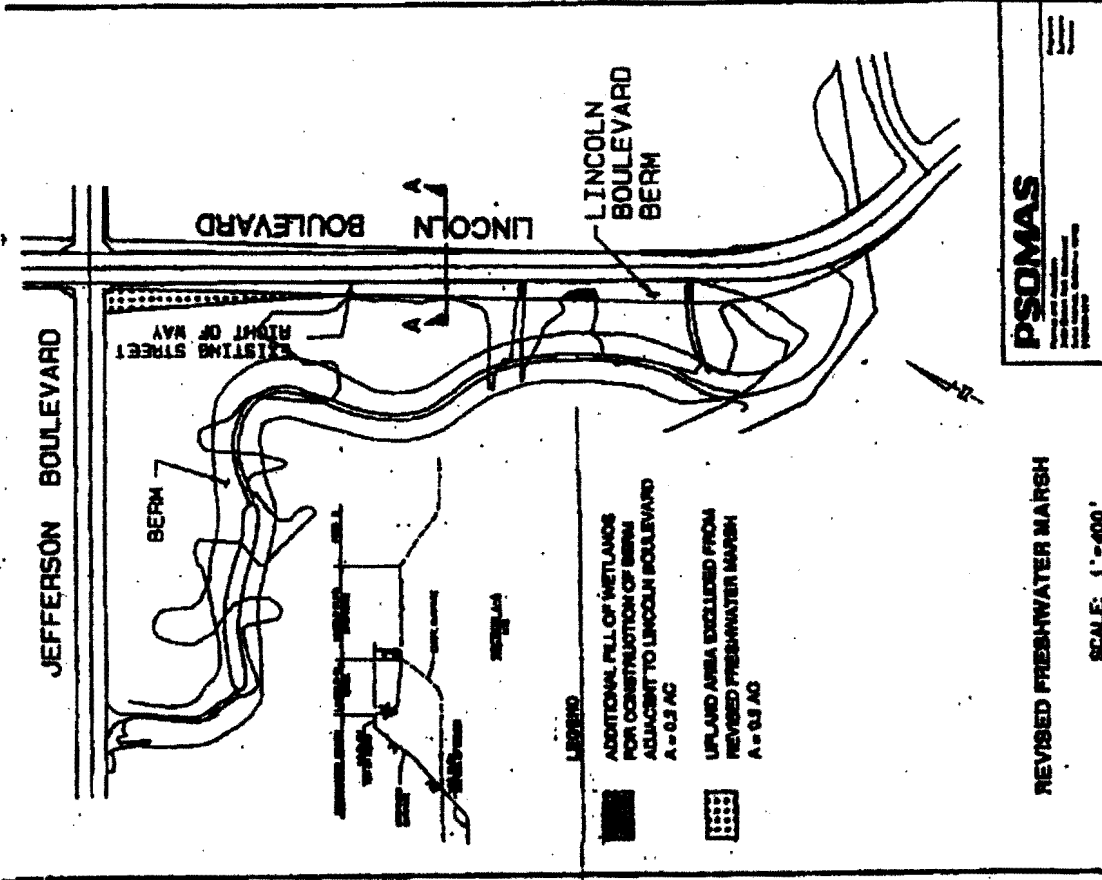
Exhibit 7 p²
previous 6-11
5-91 463

TABLE 1: TOTAL WETLANDS FACTORED TO BE FILLED AND MITIGATED
(Comparison of Acreage; Original Application & Modification)

<u>Authorization Sought in Present Application</u>				
	<u>Original</u>	<u>Modification</u>	<u>Increase</u>	<u>Location</u>
A.	<u>Freshwater Wetland BERM</u>			
	3.7 ac.	4.0 ac.	0.3 ac.	B
B.	<u>Drainage Ditches</u>			
	2.68 ac.	2.68 ac.	0 ac.	C & D
C.	<u>Isolated Wetlands</u>			
	5.17 ac.	5.17 ac.	0 ac.	B, C & D
TOTAL:	11.55 ac.	11.85 ac.	0.3 ac.	

II Authorization to Be Sought in Subsequent Applications				
	Original	Modification	Increase	Location
A.	Marina Basin			
	9.83 ac.	9.83 ac.	0 ac.	A
B.	Widening and Realignment of Culver Boulevard			

TOTAL:	9.83 ac.	12.23 ac.	2.4 ac.	
TOTAL ALL APPLICATIONS:	21.38 ac.	24.08 ac.	2.7 ac.	
III Mitigation Certification Sought in Present Application				
A. 31.1-acre wetlands system for 24.08 acres potential fill				



5.01.184 Exhibit 7
5.01.463 approved 8.11

August 1, 1991

BY MESSENGER

Maguire
Thomas
Partners

Colonel Charles S. Thomas
Commander and District Engineer
U.S. Army Corps of Engineers
360 W. Los Angeles Street
Los Angeles, CA 90012

Re: Permit Application No. 90-426-RV

Dear Colonel Thomas:

August 14, 1990, Maguire Thomas Partners-Playa Vista (MTP-) applied for a permit under Section 404 of the Clean Water Act to dredge/fill 18.88 acres of delineated wetlands (4 acres of which would be restored to wetlands and 11.88 acres of which would not) to create a freshwater wetlands system and for mixed use development. The permit application also requested that the freshwater wetlands system be certified as sufficient mitigation for the dredge/fill of a total of approximately 21.38 acres (including the foregoing 11.88 acres) proposed for all phases of the Playa Vista development.

This letter requests three modifications to the permit application:

- authorization to fill an additional approximately 0.9 acre of delineated wetlands for the freshwater wetlands berm;

- 0.9-acre revision in the size of the proposed freshwater wetlands system to 31.1 acres from 31 acres; and,

- request for mitigation certification for an additional approximately 2.7 acres of fill, including the 0.9 acre additional fill noted above and 2.4 acres of fill for public infrastructure (increase from 21.38 to 24.08 acres).

(See attached Table 1 for a comparison of the dredge/fill and mitigation originally requested to that which is now requested).

0.9 ACRE ADDITIONAL WETLANDS FILL REQUESTED

Of the 11.88 acres for which authorization to fill was sought in the original permit application, 7.7 acres would be filled to construct the freshwater wetlands berm (4 of the 7.7 acres would be restored to wetlands). The 3.7 acres that would be permanently filled would be for a berm separating the freshwater marsh from a proposed restored salt marsh system to the west. This request for modification seeks authority to fill an additional approximately 0.9 acre of wetlands for a portion of the freshwater marsh berm adjacent to Lincoln Boulevard.

This portion of the berm is necessary to contain water within the freshwater marsh to prevent flooding of Lincoln Boulevard and portions of Area B during major storm events, and to provide drainage for Lincoln Boulevard. This need exists because during one-year or greater storm events the freshwater marsh will fill to an elevation of +8 feet MSL (mean sea level). In contrast, Lincoln Boulevard adjacent to the freshwater marsh is mostly at elevations of between +6.5 feet MSL and +7.8 MSL, steeply rising at the most southerly edge of the freshwater marsh to well above +11 feet MSL. The berm is proposed to be constructed between the freshwater marsh and the lower portions of Lincoln Boulevard in order to address this problem and to accommodate Lincoln Boulevard drainage. Since the City of Los Angeles requires 3 feet of free board over maximum water heights, the berm would be constructed to an elevation of +11 feet MSL.

The freshwater marsh berm adjacent to Lincoln Boulevard would be approximately 2,200 feet long and cover approximately 2.5 acres (0.9 acre of which is delineated wetlands). It would require approximately 10,000 to 12,000 cubic yards of fill. The slope of the berm to the existing grade of Lincoln Boulevard would be approximately 2:1 to 3:1. As seen from existing Lincoln Boulevard, the completed berm would vary in height from 0 to 4 feet. The eastern slope of the berm, which is not part of the proposed 31.1-acre freshwater wetland system, would be planted with appropriate vegetation and maintained. (See attached Figure 1).

0.9-ACRE REVISION OF THE FRESHWATER WETLANDS SYSTEM

The freshwater wetlands system consists of two components: the riparian corridor and the freshwater marsh. The riparian corridor would run parallel to the Westchester Bluffs in Area I and then pass under Lincoln Boulevard via a conduit into Area I where it would join the freshwater marsh. It is requested that the permit application be revised to exclude 0.9 acre of uplands from the proposed freshwater wetlands marsh in the area of the marsh parallel to and west of Lincoln Boulevard at the

Exh. b. 1 & 5.01.184
re related Corps permit

Habitat Value of the Wetlands to be Filled

The wetlands to be filled are part of a wetland system with habitat values ranging from low to moderate. Two species of crayfish are present in portions of Centinela Ditch: the Louisiana swamp crayfish (*Procambarus clarkii*) and the Pacific coast crayfish (*Pacifastacus* sp.). The only fish present in Centinela Ditch is the introduced mosquitofish (*Gambusia affinis*).

In the 1989-1991 bird surveys which were conducted at Playa Vista, over eight birds species were observed using Centinela Ditch or the adjacent wetlands, but none nested in the area to be filled. *Virginia opossum* (*Sidelpais virginiana*) and raccoons (*Procyon lotor*) may also frequent the area.

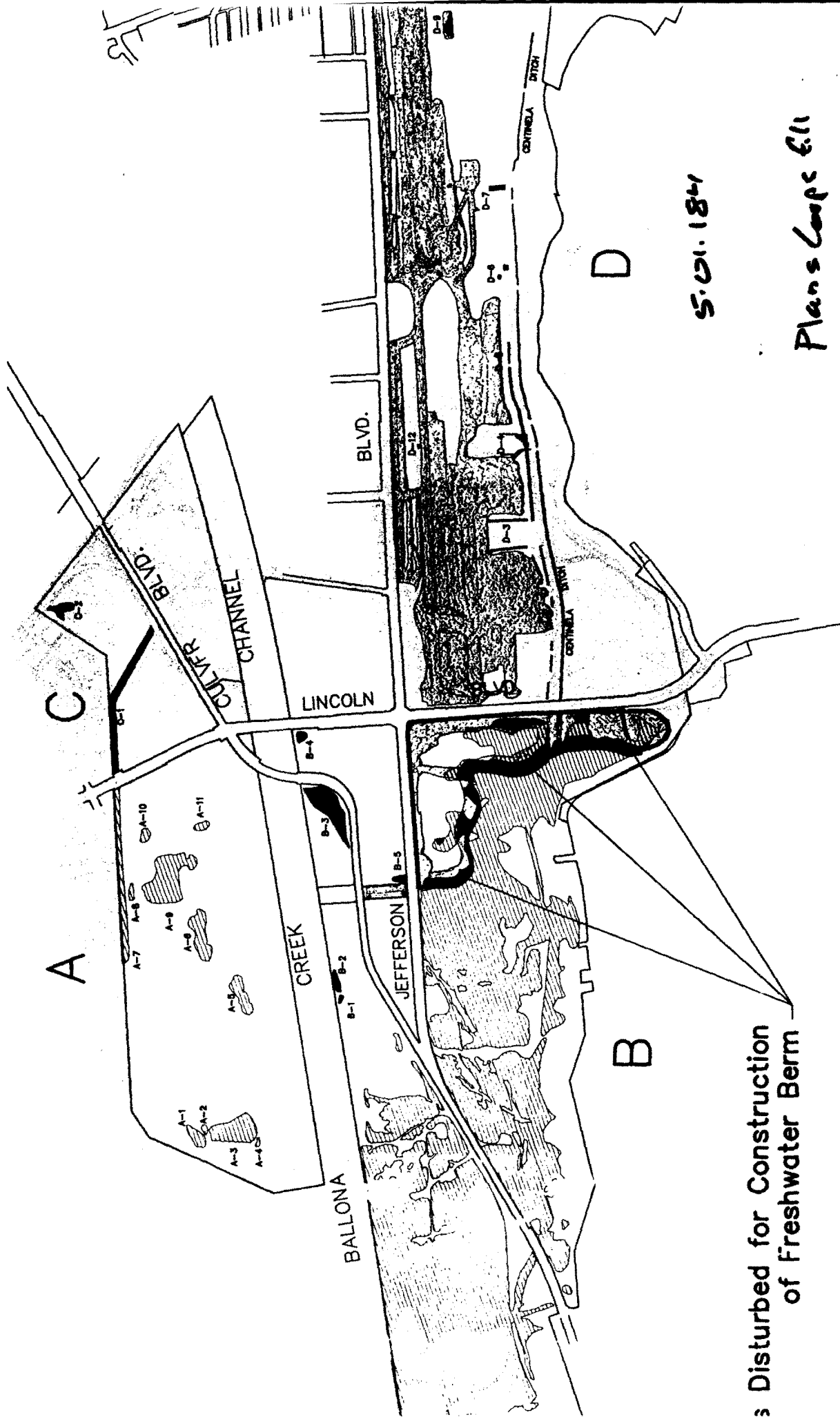
Lining of the Riparian Corridor

Approximately the eastern two-thirds of the riparian corridor will be lined with clay to prevent the percolation of surface water. The channel will be over-excavated and approximately 2 feet of clay will be placed in the channel bottom to the outer extent of the channel banks. The excavated soil will be replaced over the clay liner to create the stream bottom and side banks.

5.01.1841

Exhibit 82

related
Coiper approved
Fill



Disturbed for Construction
of Freshwater Berm

5.01.1841





Plans & Maps E.11

Exh. b. + 9

B

Wetlands Disturbed for Construction
of Freshwater Berm

LEGEND:

- | | |
|---|--|
|  | Wetlands permitted to be filled under Corps Permit 90-426-EV |
|  | Disturbed Area as 6-26-98 |
|  | Disturbed Wetlands |
|  | Other existing federal delineated wetlands. |

Playa Capital Company, LLC

5-01-184

Exhibit 9 p 2

Corps approval
E.II
(key)

	Cal Cstl Comm. Adopted 1982	CDFG Proposed Feb 1991	WRA* Proposed June 1991	\$1603**
Existing Wetlands On Site	ACRES	ACRES	ACRES	ACRES
Area A	37.50	20.00	13.12	1.70
Area B	112.00	112.00	112.00	
Area C	2.50	2.50	2.20	1.40
Area D				1.30
TOTAL	152.00	134.50	127.32	4.40
Wetlands to be Converted to Uplands	ACRES	ACRES	ACRES	ACRES
Area A				
Isolated Wetlands			12.01	
Drainage Ditch			1.11	
Subtotal	37.50	20.00	13.12	1.70
Area B				
Within Freshwater Marsh	1.29	1.29	1.29	
Contiguous Wetlands for Lincoln Blvd.	0.15	0.15	0.15	
Contiguous Wetlands for Culver Blvd.	1.60	1.60	1.60	
Other Isolated Wetlands	0.00	0.00	0.00	
SubTotal	3.04	3.04	3.04	
Area C				
Isolated Wetlands			1.18	
Drainage Ditch			1.02	
SubTotal	2.50	2.50	2.20	1.40
Area D				
Isolated Wetlands			0.00	
Drainage Ditch			0.00	
SubTotal	0.00	0.00	0.00	1.30
TOTAL Existing Wetlands to Uplands	43.04	25.54	18.36	4.40
NET GAIN in Wetland Acres With Project	8.96	26.46	33.64	47.60
- 52 - TOTAL Existing Wetlands				

* Proposed delineation prepared by WRA at request of the Friends of Ballona Wetlands.

Assumes that wetlands in Area B would be State delineated.

** Moving of Centinela Ditch and drainage channels in Area A and C will require \$1603

Agreement, which will include mitigation requirements

EXHIBIT NO. 8
APPLICATION NO.
5-91-463
WETLAND DELINEATIONS

Printed Wetland File

5-01-184
E. V. H. H. H.



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90063-2711

SPECIAL PUBLIC NOTICE

JURISDICTIONAL DETERMINATION

AT

PLAYA VISTA

JANUARY 17, 1989

RECEIVED
AUG 27 1998

CALIFORNIA
COASTAL COMMISSION

REPLY TO
ATTENTION OF

You are hereby notified that the U.S. Army Corps of Engineers, Los Angeles District, has completed an interim delineation of waters of the U.S. at Playa Vista, city and county of Los Angeles, California.

All land and water areas seaward of the mean high water elevation of + 4.65 feet mean lower low water are subject to jurisdiction pursuant to Section 10 of the Rivers and Harbors Act. Additionally, all land and water areas designated by hatched lines on the attached map are subject to jurisdiction pursuant to Section 404 of the Clean Water Act. By definition, this jurisdiction includes all navigable waters subject to Section 10 authority plus all other waters and wetlands as defined in 33 CFR 328.3.

Extensive data from numerous sources were considered in reaching this interim delineation including previous delineations at the site performed by Huffman (September 1986) and by Sanders and Straw (October 1987); photograph evidence submitted by the Center for Law in the Public Interest; and field investigations conducted by wetland experts from the Corps of Engineers Waterways Experiment Station. Additionally, extensive comments generated as a result of circulation of the wetland delineation performed by Drs. Sanders and Straw and rebuttals to those comments prepared by the authors were reviewed in detail.

Generally, the Corps of Engineers agrees with the delineation performed by Sanders and Straw with expansion of certain areas as indicated on the attached map. The Corps finds that those areas so designated meet the three parameter test for wetlands according to the Corps of Engineers Wetland Delineation Manual (January 1987).

A total of 182.19 acres at Playa Vista have been delineated as Waters of the U.S. Area A (see map) will continue to be evaluated during the next 3-4 months to determine if any of this area qualifies under the category of other waters, i.e., isolated waters that are not wetlands. Up to seven additional acres may be added to the current 182.19 acres if observations at the site support that addition. Once this work is completed the delineation will be finalized.

This Notice is issued by the Chief, Regulatory Branch

5.01.184
Exhibit 11

p1
Corps 1989
lower letter

PLAYA VISTA-BALLONA WETLANDS
 JURISDICTIONAL DETERMINATION
 FINAL DELINEATION
 JUNE 1989
 AREAS A, B & C
 WATERS OF THE U.S. -

Scale: 1 inch = 800 feet



5-01-1361

Exhibit 1

11, p2

Caps de lineation
 f wetlands

Exhibit-11 5.01.48.184

P 3

enlarged
Co's
delineation

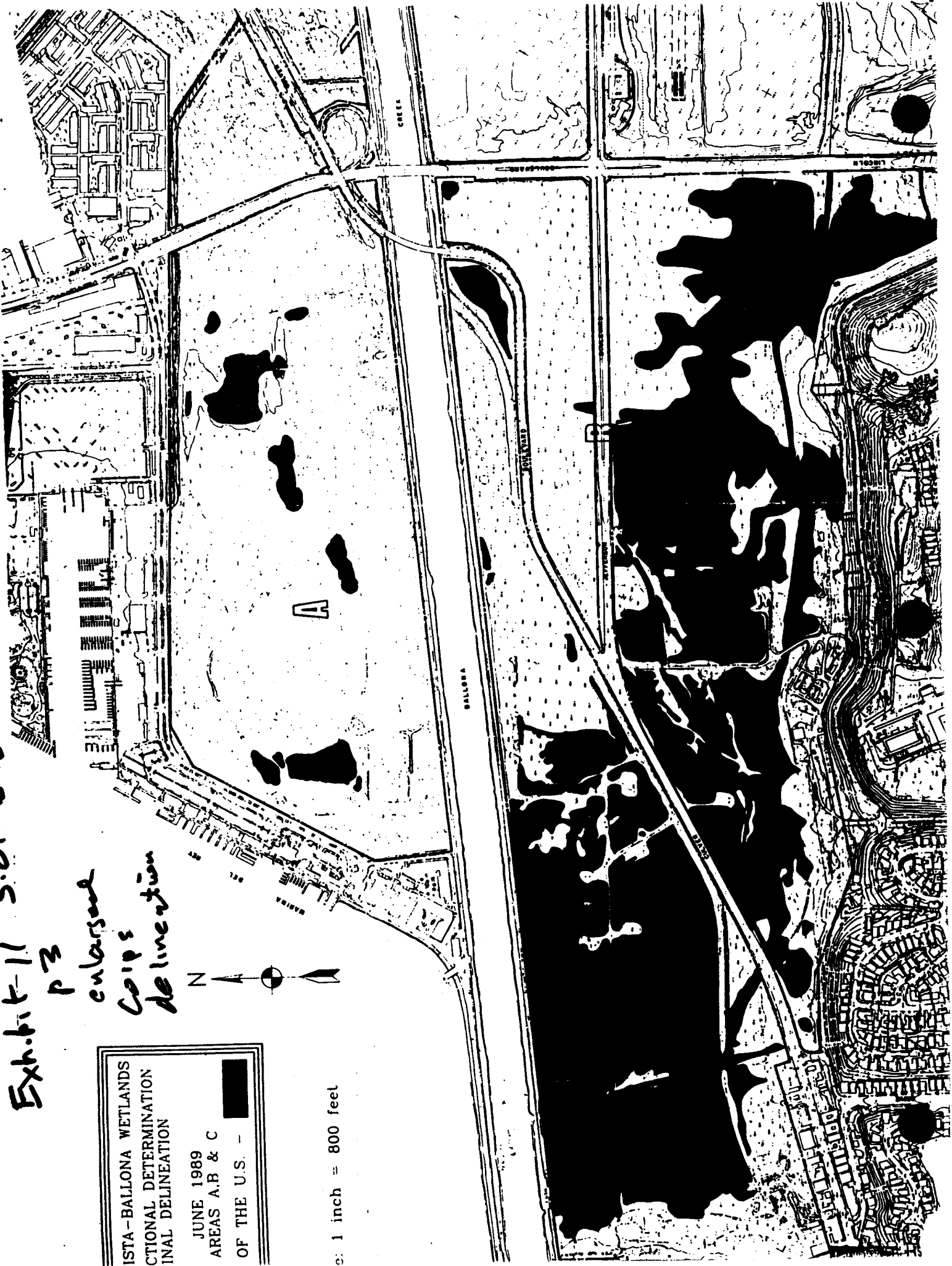
ISTA-BALLONA WETLANDS
CTIONAL DETERMINATION
INAL DELINEATION

JUNE 1989

AREAS A,B & C

OF THE U.S. -

1 inch = 800 feet



Memorandum

To : Mr. Jim Burns
Assistant Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California

Exhibit 12

P 1

Date : December 20, 1991

5-01-154

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EXHIBIT NO.	2
APPLICATION NO.	5-91-463
CONDITION COMPLIANCE	DFG'S WETLAND MEMO
California Coastal Commission	

From : Department of Fish and Game

Subject : Ballona Wetlands Acreage Determination Contained in the
Department of Fish and Game's September 12, 1991 Memorandum to
the Fish and Game Commission

The Department has provided the Coastal Commission with information regarding the extent and condition of wetland and other environmentally sensitive habitat areas within the Playa Vista Land Use Planning area for the past ten years. Our determinations in this regard were used by the Coastal Commission in certifying the Playa Vista Land Use Plan.

It seems that the primary, present, controversy is limited to the extent of wetland acreage north of the Ballona Creek Channel. It is important to recognize that this controversy existed at the time we prepared our September 12, 1991 memorandum to the Commission regarding approximately 52-acre "Freshwater Marsh/Open-Water Wetland-Riparian Area Project". This project was before the Commission at that time (Application Number 5-91-463). We provided the Commission with a map indicating the extent of pickleweed-dominated saltmarsh and other vegetative communities on the large fill area north of Ballona Creek Channel. Department personnel ground-truthed the accuracy of the vegetation map prior to its transmittal to the Commission, and we found it to be highly accurate. We also provided the Commission with a table indicating precisely quantified acreage for each of 28 distinct, independently-measured subareas of the pickleweed-dominated saltmarsh wetland type on the fill area. This totaled 19.95 acres which we rounded off to 20 acres for the purposes of discussion in the text of our 7-page memorandum.

We also mapped 17.66 acres of patchy pickleweed distributed within what was characterized as an upland vegetative association (page 2 of our September 1991 memorandum). Most of this 17.66 acres was dominated by pickleweed prior to the onset of the present drought cycle. Consequently, we found it likely that a portion of these 17.66 acres would again be dominated by pickleweed given a return of normal rainfall.

Lastly, we determined that portions of the 4.78 acres of saltflat were wetlands by virtue of periodic inundation which we

Mr. Jim Burns
December 20, 1991
Page Two

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Fish & Game letter
Exhibit 12 p

observed several years ago but that was at the time of the field inspection of Area A, prior to transmittal of our September 12, 1991 memorandum, these saltflats did not function as wetlands.

Using the observation discussed in the presiding two paragraphs, and applying the wetland definition contained in the document entitled "Classification of Wetlands and Deepwater Habitats of the United States" (Cowardin, et al., 1979), we informed the Commission that not less than 20 acres of the Area A presently functioned as wetland by virtue of dominance by obligate hydrophytic vegetation even after five years of drought. Since our past wetland determinations on Area A included the acknowledgement of the presence of 2.5 acres of saltflat which functioned as wetland by virtue of periodic inundation we found it probable, and continue to find it probable, that 2.5 acres of saltflat would again function as wetland given a return of normal rainfall. We formerly identified 37.5 acres of wetland in Area A, and we continue to believe that, under normal rainfall conditions, 37.5 acres would again function as wetland. These 37.5 acres of wetland may be generally characterized as being composed of the 20 acres of existing pickleweed-dominated saltmarsh, 2.5 acres of saltflat, and 15 acres of recovered saltmarsh from the existing 17.66 acres of patchy pickleweed community. We reiterate for clarity that only the 20 acres of pickleweed-dominated saltmarsh presently functions as wetland.

We do not agree with the opinion which holds that the pickleweed-dominated flats are simply an indication of the saline nature of the original dredge spoils. In point of fact, there are several plant species in Area A which are very tolerant of saline soil conditions. Among these are salt grass (Distichlis spicata) and Atriplex spp. Further, Salicornia grows quite well in nonsaline soils. The patterns of vegetative dominance in Area A are based upon essentially two factors, soil salinity and substrate saturation. Where we have both saline soils and low-elevation (and therefore increased degree of substrate saturation) we find that competitive advantage is conferred upon pickleweed. In areas with low soil salinities at higher elevation (and therefore relatively little soil saturation) typical ruderal species predominate. In areas of similar elevation, and elevated soil salinities, we find Atriplex and Baccharis. In areas where soil saturation levels are especially high and the substrate is subject to inundation and/or has been highly compacted through time, we have saltflats which typically are too salty for pickleweed and at times may be too wet, too long to support pickleweed. Lastly there are areas, essentially the 17.66 acres of patchy pickleweed designated on the map we appended to our September 12, 1991 memorandum, where salinities and saturation are in a state of flux and in which after 5 years

Mr. Jim Burns
December 20, 1991
Page Three

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Exhibit 12 P3
Fish & Game letter

of drought pickleweed is being out-competed by upland indicator species.

Additionally, we do not necessarily agree that substrate salinities in Area A are markedly different now than they were a decade ago. One has only to observe the pickleweed-dominated flats at Bolsa Chica, which have been isolated from tidal influence for 70 years, to see that maintenance of substrate salinity in an essentially closed system is definitely both possible and fairly frequently encountered in southern California.

In summary, we found that 20 acres of Area A functioned as wetland in September 1991, and that we saw little reason to assume that less than 37.5 acres of wetland would exist in Area A given normal rainfall. This continues to be our position.

It is important to realize that the Commission and the Department have used the Cowardin wetland definition for wetland identification purposes in the Commission's land use decisions since 1978 (when the 1979 document was still an operational draft); that the Commission allied the wetland definition contained in the Coastal Act with the U.S. Fish and Wildlife Service's (USFWS) wetland definition (i.e., Cowardin, 1979) in the Commission's Interpretive Guidelines (1982); and that the Commission very clearly indicates in these Interpretive Guidelines that the USFWS definition is to be used for wetland identification in the Coastal Zone. The USFWS definition identifies areas which are at least seasonally dominated by hydrophytes as wetlands. In Area A, 20 acres are dominated by Salicornia virginia, an obligate hydrophyte with a wetland occurrence probability in excess of 99 percent after five years of drought. The areas in which Salicornia virginia continues to dominate are usually at a somewhat lower elevation than the patchy pickleweed and other areas which do not presently function as wetlands. The reason that pickleweed continues to dominate the lower elevations is that these lower areas are wetter longer than the areas at higher elevations. Areas which are wet enough, long enough to support dominance by hydrophytic vegetation are wetlands per the USFWS definition. Any fair application of the Cowardin (USFWS) wetland definition to Area A will reveal the presence of not less than 20 acres of pickleweed-dominated saltmarsh, which is clearly a wetland type.

In Area B we are on record as having agreed with the Corps of Engineers identification of 170.56 acres of wetland. During the evolution of the now certified Playa Vista Land Use Plan, we predicted that, were it not for the then ongoing agricultural operation, wetlands in Area B would expand. These agricultural

Mr. Jim Burns
December 20, 1991
Page Four

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Fish + Game letter

activities ceased for approximately three years prior to the Corps' wetland determination, and, as we predicted, the wetlands did expand into the area which was formerly used for the production of barley and lima beans. Further, wetlands expanded in the triangular area south of Centinella Creek and immediately adjacent to Lincoln Boulevard presumably in response to increased run-off from recently developed areas located on the bluffs. We were instrumental in the ultimate designation of 170.56 acres of wetland by the Corps in Area B and we support that figure as accurate. In Area C, we identified 2.5 acres of wetland in our previous determination, and we continue to believe this to be an accurate assessment. In area D, outside the Coastal zone, east of Lincoln Boulevard and south of Ballona Creek Channel, we have not independently determined wetland acreage. However, we have examined the Corps' delineation, briefly inspected Area D, and find the Corps' identification of 3.47 acres of wetland in Area D to be accurate.

For these reasons we find that 196.53 acres of wetland presently exist within the overall planning area, and we find that 214.03 acres would likely exist given a return of normal precipitation.

Should you have questions regarding this memorandum, please contact Mr. Bob Radovich, Wetland Coordinator, Environmental Services Division, Department of Fish and Game, 1416 Ninth Street, Sacramento, California 95814, telephone (916) 653-9757.

Howard A. Saravali for
Pete Bontadelli
Director

cc: Mr. William Shafroth
Resources Agency









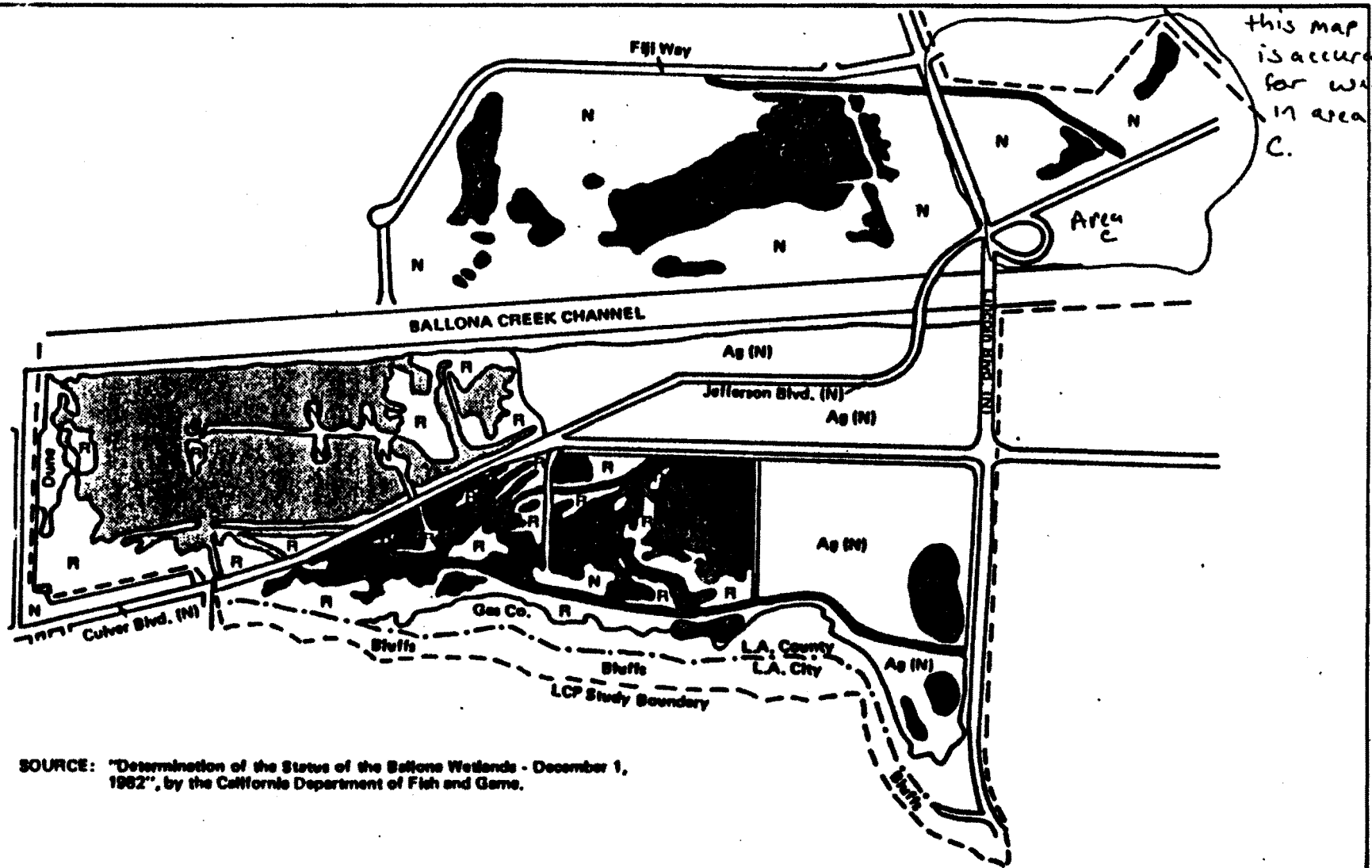
5-01-184

Exhibit 12 p5
Fish reserve delineation letter

map 14

PRESENT STATUS OF THE BALLONA REGION

 Non-degraded wetland	 Feasibly restorable former wetland	 Former wetlands Agricultural Field
 Degraded wetland	 Former wetland not feasibly restorable	 Environmentally sensitive upland

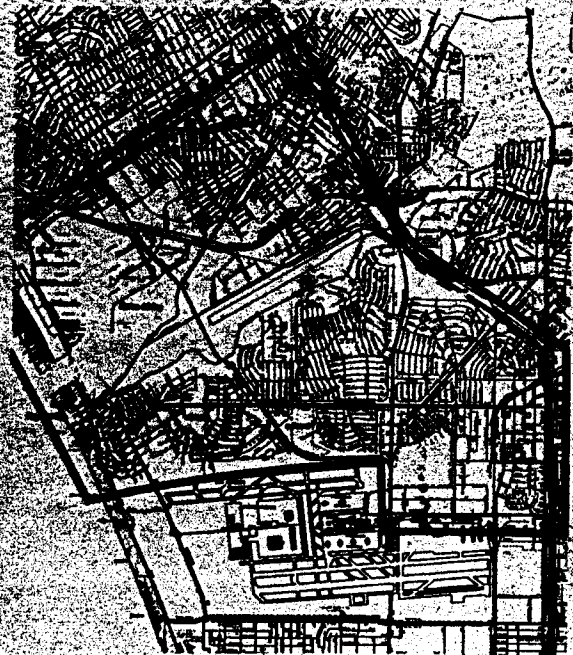


this map is accurate for water in area C.

1146
Fish & Game better
Exhibit 12
P. 6
5-01-154

SOURCE: "Determination of the Status of the Ballona Wetlands - December 1, 1982", by the California Department of Fish and Game.

ECLA



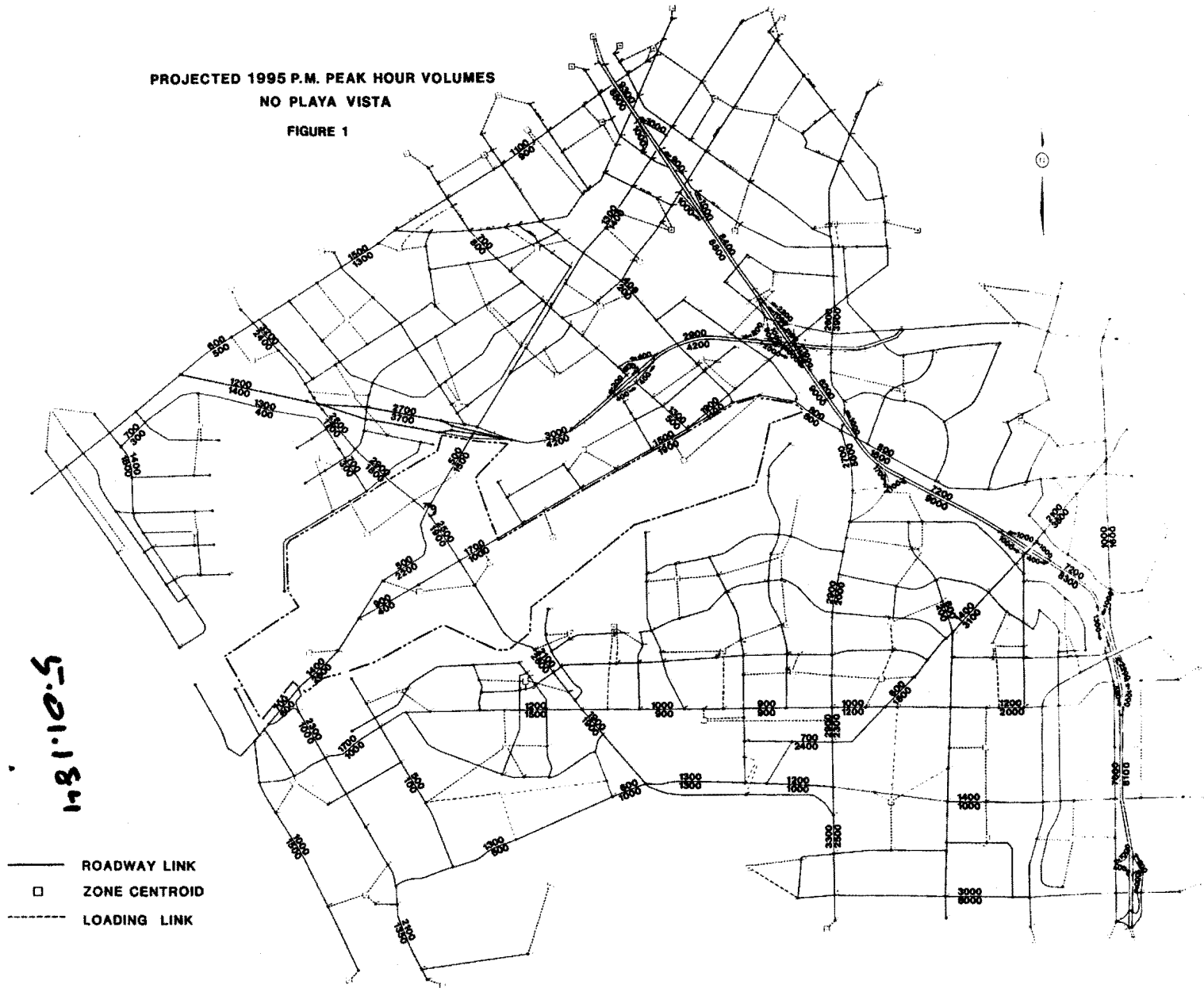
ADDENDUM TO
**Playa Vista
Study Area**
**Transportation
Analysis 1995**

Prepared for
SUMMA CORPORATION
By Barton-Aschman Associates, Inc.

Exhibit 13
Transportation
report p1
5-01-184

PROJECTED 1995 P.M. PEAK HOUR VOLUMES
NO PLAYA VISTA

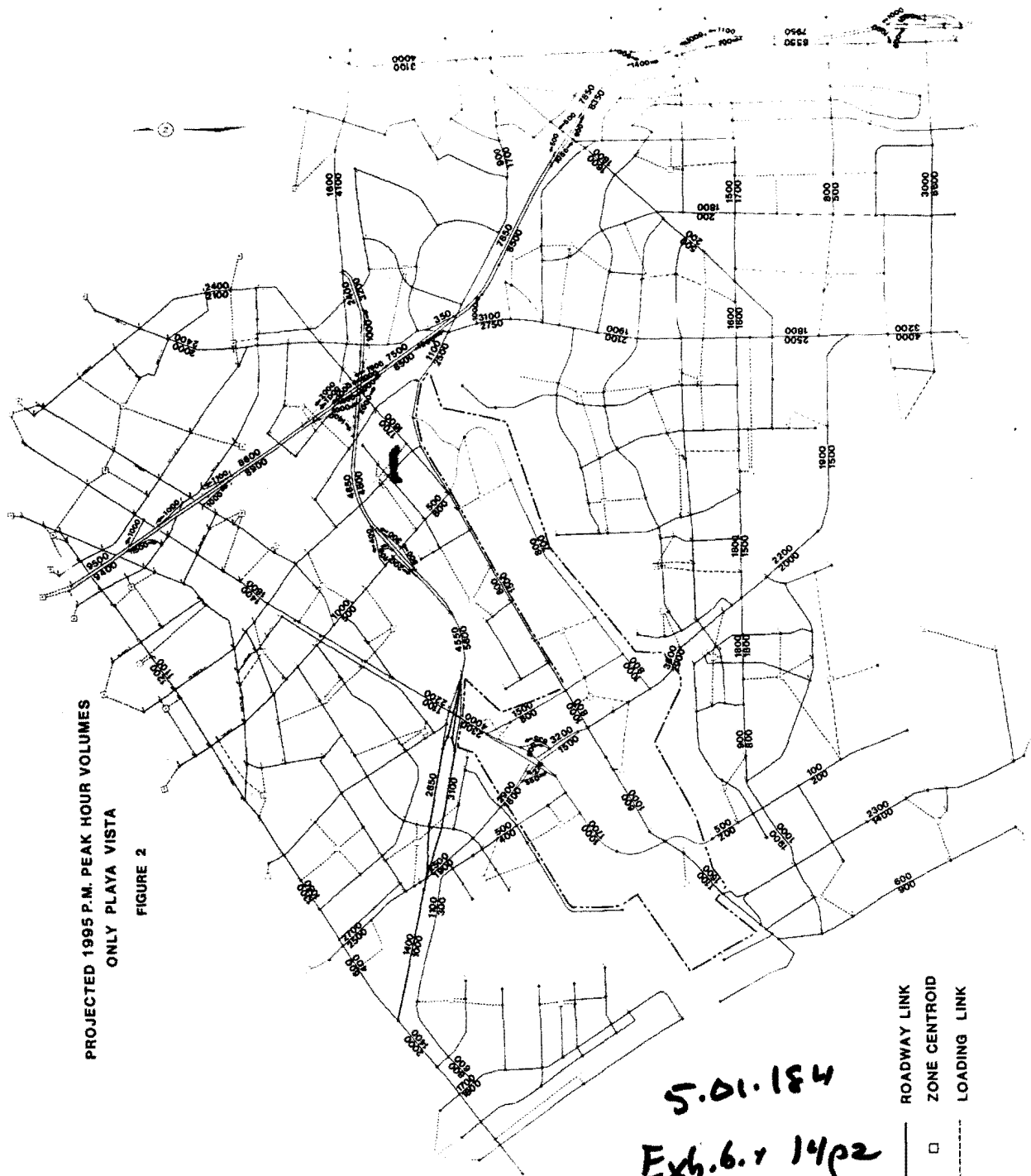
FIGURE 1



5.01.1841

ROADWAY LINK
ZONE CENTROID
LOADING LINK

Exhibit 14 p1
input map
Boston Aschman 1995



**TABLE 9
MITIGATION IMPLEMENTATION PHASING**

Table 6-2(b) Revised 8/28/95 to Reflect Playa Vista Studios

**ATTACHMENT "K" (Revised May 13, 1993 Due to Alternate Mitigation)
TRANSPORTATION IMPROVEMENTS SUBPHASING PLAN
PLAYA VISTA FIRST PHASE MITIGATIONS**

EXHIBIT NO.

APPLICATION NO.
5-01-184

Exhibit 15
Playa Vista

City Measure

Subphase	Location	Program	Intersection/Street Improvements
1A	West end of Area D, South of Jefferson Boulevard	800 du 5,000 nsf retail 10,000 nsf office 15,000 nsf community serving	<ul style="list-style-type: none"> Connect northbound Lincoln to eastbound Culver - Widen Ballona Creek Bridge (a portion of east side) Improve Culver between new Culver/Lincoln connection and the Marina Freeway Complete construction of Bay Street between Jefferson Boulevard and existing Teale Street. If connection cannot be made to Teale Street, alternative improvements will be the construction of Lincoln/Jefferson intersection to ultimate design standards as described in DOT letter of September 16, 1992. Lincoln/Jefferson (northeast and southeast quadrants only) Provide funding for design of ATSAC and pre-emption systems for Lincoln Boulevard Transit Enhancement Program At grade improvements to Culver/Marina Freeway westbound At grade improvements to Culver Marina Freeway eastbound
1B	West end of Area D, north and south of Jefferson Boulevard	800 du 10,000 nsf retail 10,000 nsf office 25,000 nsf community serving	<ul style="list-style-type: none"> Widening of Lincoln Boulevard to provide 4 northbound and 4 southbound lanes between Hughes Terrace and Jefferson Boulevard Lincoln/Jefferson (Complete intersection improvements as required in September 16, 1992 letter) Widening of Jefferson Boulevard between Lincoln Boulevard and Bay Street Provision and operation of beach shuttle service Culver/Jefferson La Tijera/I-405 Freeway northbound (cash contribution) Main/Rose
1C	West end of Area D, north and south of Jefferson Boulevard	800 du 5,000 nsf retail 10,000 nsf office	<ul style="list-style-type: none"> Widening of Lincoln Boulevard to provide 4 northbound and 3 southbound lanes between north of Jefferson Boulevard and Ballona Creek Bridge Add a third northbound lane on Lincoln Boulevard between Culver Connector and Fiji Way Complete construction of Bay Street between "new" Teale Street and "B" Street Complete construction of "new" Teale Street between Lincoln Boulevard and Bay Street Widening of Jefferson Boulevard between Bay Street and west of Beethoven Complete funding of ATSAC and pre-emption systems for Lincoln Boulevard Transit Enhancement Program Culver/Nicholson Culver/Vista del Mar Lincoln/Mindanao

TABLE (continued)
MITIGATION IMPLEMENTATION PHASING

Table 6-2(b) Revised 8/28/95 to Reflect Playa Vista Studios

ATTACHMENT "K" (Revised May 13, 1993 Due to Alternate Mitigation)
TRANSPORTATION IMPROVEMENTS SUBPHASING PLAN
PLAYA VISTA FIRST PHASE MITIGATIONS

EXHIBIT NO. 15p2
APPLICATION NO. 5.01.184
PV Mitigation

Subphase	Location	Program	Intersection/Street Improvements
1D	West end of Area D, north and south of Jefferson Boulevard	846 du 10,000 nsf office 5,000 nsf community serving	<ul style="list-style-type: none"> • Widening and addition of fourth northbound lane on Lincoln between La Tijera and Hughes • Terrace • Construction of "new" Teale Street between Bay Street and the terminus east of 7th Street within • First Phase west end • Provision and operation of two transit vehicles for Lincoln corridor (plus a spare bus)
1E	West end of Area D, north of Jefferson Boulevard	350,000 nsf office 5,000 nsf of retail	<ul style="list-style-type: none"> • Provide funding and design for ATSAC on Jefferson Boulevard between Beethoven and Centinela • Provision and operation of two additional transit vehicles for Lincoln corridor • Provide a Caltrans approved project study report (PSR) for the grade separated improvement at Culver and Marina Freeway • Construction of Bay Street bridge over Ballona Creek and Bay Street between B Street and Culver • Widening of Centinela Avenue between Jefferson Boulevard and northerly of Juniette Street • Centinela/Culver • Centinela/Short • Culver/Inglewood • Manchester/Pershing • Marina Freeway eastbound/Mindanao • Marina Freeway westbound/Mindanao

TABLE (continued)
MITIGATION IMPROVEMENTS PRESENTATION PHASING

Table 6-2(b) Revised 8/28/95 to Reflect Playa Vista Studios

**ATTACHMENT "K" (Revised May 13, 1993 Due to Alternate Mitigation)
TRANSPORTATION IMPROVEMENTS SUBPHASING PLAN
PLAYA VISTA FIRST PHASE MITIGATIONS**

EXHIBIT NO. 15p3
APPLICATION NO. 3-21-184
PV Mitigation

Subphase	Location	Program	Intersection/Street Improvements
1F	East end of Area D	1,170,000 net sf of studio and studio-related office	<ul style="list-style-type: none"> • Centinela/Marina Freeway eastbound • Centinela/Marina Freeway westbound • Jefferson/I-405 Freeway--westbound right turn improvements at the existing northbound on-ramp • Jefferson/I-405 Freeway--eastbound right turn improvements at the existing southbound on-ramp • Centinela/Jefferson (complete intersection improvements) • Option B improvements to Centinela Avenue between the Marina Freeway and Juniette Street • Complete construction of "E" Street from 9th Street to Centinela Avenue before occupancy of any office space in 1F • Construction of Centinela Avenue south between Jefferson Boulevard and E Street • Construction of Teale Street between 11th Street and existing Centinela Avenue connection to Major Street • Widening of existing Centinela Avenue between Jefferson Boulevard and Mesmer Avenue • Widen Jefferson between Centinela Avenue and I-405 Freeway • Guarantee the westbound portion of the grade separation at Culver/Marina Freeway prior to occupancy of any office space in 1F and complete construction of the westbound grade separation prior to occupancy beyond 850,000 net sf of non-residential space or 2,401 dwelling units in Area D • Centinela/La Cienega • Centinela/La Tijera • All intersection improvements along Sepulveda Boulevard between Howard Hughes Parkway and Lincoln Boulevard • Major/Mesmer

Source: From First Phase Final EIR - May 26, 1993 - "Corrections and Additions" - Technical Appendices, pages F-97 through F-100; ATTACHMENT "K" (Revised May 13, 1993 due to Alternate Mitigations) and Revised on August 28, 1995 to reflect Subphase 1F revisions; and City of Los Angeles Department of Transportation, August 1995.

- Notes:
1. For a complete description of transportation improvements, refer to DOT letters dated September 16, 1992 and May 13, 1993, corresponding drawings, and attachments.
 2. Where appropriate, as determined by DOT, revisions may be made to this Sub-Phasing Plan.
 3. For Transportation Demand Management (TDM) Program, refer to DOT letter dated September 16, 1992.
 4. Areas are expressed in terms of floor area as defined in the Area D Specific Plan.

Memorandum

to : Mr. Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date : March 22, 1993

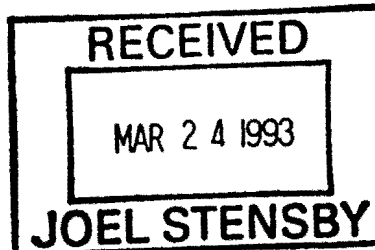
File No.:

IGR/CEQA
City of Los Angeles
DEIR
PLAYA VISTA PHASE I
90-0200
SUB (C) (CUZ) (CUB)
Vic. LA-1, 90, 405

From : Robert Goodell - District 7
DEPARTMENT OF TRANSPORTATION

Subject : Project Review Comments

SCH No. 90010510



Caltrans has reviewed the above-referenced Playa Vista Phase I draft EIR and Vesting Tentative Tract Map No. 49104, which includes 3,246 dwelling units; 1,250,000 square feet of new office space; 35,000 square feet of neighborhood retail space; and 300 hotel rooms

This memorandum is to modify and clarify the comments in our memorandum of December 29, 1992 regarding the Playa Vista Phase I-DEIR. Pages two and three of the original memorandum have been modified to reflect mitigation changes discussed in meetings between Maguire Thomas Partners, Caltrans, and the City of Los Angeles on February 17, 1993 and March 11, 1993.

The following is our modified DEIR response:

We have concerns about the capability of the roadway pavement and the adequacy of the existing traffic lanes to accommodate the additional traffic generated by this project on our transportation facilities.

Designs based on twenty year traffic projection data (including percentage of trucks) should be provided to mitigate the impact of this project on the existing State highways, including Route 1 (Lincoln Blvd.), Route 90 (Marina Freeway), Route 105 (Manchester Blvd.) and Route 405 (San Diego Freeway).

This project, along with numerous other projects in the vicinity of the Marina, have the cumulative effect of adding approximately 40,000 to 50,000 peak hour trips to the system. Expansion of activity at LAX is estimated to add an additional 4,000 to 6,000 peak hour trips to the area system. Volume/capacity ratios would be as high as 1.86 on the Route 405 Freeway, if all these projects are implemented. Proportional share mitigation measures for Playa Vista Phase I, as well as for all other traffic generating projects in this region, need to be implemented prior to or simultaneously with the construction of these projects.

EXHIBIT NO. 16 p1
APPLICATION NO. 3.2.1.1924
Caltrans/PUC

Mr. Tom Loftus
March 22, 1993
Page Two

This draft EIR proposes to provide primary access to the project from Jefferson Boulevard from its interchange with the I-405 freeway. This access is dependent upon modification of the interchange section, primarily to the northbound on and off-ramps. This proposal contains many nonstandard design features and approval is doubtful.

Caltrans believes that a more feasible approach is to utilize an improved Marina Freeway (Rte. 90) and provide primary access to the development via improved connections at Centinela Ave. and Culver Blvd. An improved Culver Blvd. will cause a significant diversion of traffic from the Centinela/Jefferson route thereby reducing existing through traffic within the project area on Jefferson Blvd. To do this will require widening Culver Blvd. to at least four lanes between Lincoln Blvd. (Rte. 1) and Bay Street and six lanes plus left and right turn channelization between Bay Street and Marina Freeway (Route 90). Also construct connections from N/B Lincoln Blvd. to eastbound Culver Blvd. and construct a double left turn from W/B Culver Blvd. to the proposed Bay Street, which will carry four lanes of traffic south from Culver Blvd. to Teale Street.

THE TRAFFIC MITIGATIONS WE RECOMMEND FOR PHASE I ARE AS FOLLOWS:

ON LINCOLN BOULEVARD (RTE. 1):

Among the Phase I mitigations being proposed on Lincoln Boulevard is the removal of raised channelization islands between Loyola Boulevard and Teale Street and just south of Fiji Way and the Marina Expressway (Rte. 90). The purpose of the island removal is to create a fourth northbound through lane. This would create a potential for high severity right angle and approach turn type collisions on Lincoln Boulevard within the affected segments. Left turning vehicles egressing driveways on Lincoln Boulevard and attempting to access the same would conflict with high volume straight through traffic on Lincoln Boulevard. The operational benefits which are to accrue are rather questionable due to the increased accident potential and because only one direction is benefited. Also, substandard ten-foot through lane would be employed. We do not feel that the trade-off of marginal operational benefits at the expense of safety is justified.

Instead, we propose that from La Tijera Boulevard to Hughes Terrace, a 60/40 signal timing split be provided in lieu of increasing the northbound lanes from 3 to 4 by removing the traffic islands. From Hughes Terrace to Fiji Way widen to 4 lanes in each direction. Provide more intersection capacity at Jefferson Boulevard and construct the southeast quadrant of the separated interchange at Culver Boulevard. Also, construct a four lane section of Bay Street from Culver Boulevard to Teal Street in the location shown on the "Playa Vista Master Plan".

EXHIBIT NO. 16
APPLICATION NO. 5-20-184
Caltrans

Mr. Tom Loftus
March 22, 1993
Page Three

ON THE MARINA FREEWAY (Rte. 90):

- a) Extend the full six lane freeway section of the Marina Freeway fr east of Ballona Creek, over Culver Boulevard. Continue Route 90 a a six lane expressway, with channelization, west of Culver Blvd. moving the E/B roadway, north, adjacent to the W/B roadway creati a six lane expressway in the northerly portion of the right-of-we This should join a realigned six lane expressway at Lincoln Boulevard (Route 1).
- b) Construct a full Diamond Interchange at Culver Boulevard. The westbound off-ramp and the eastbound on-ramp providing three lane
- c) Maintain existing access for Alla Road to and from W/B Marina Freeway and Culver Boulevard.

ON THE SAN DIEGO FREEWAY (I-405):

- a) Construct a collector road for the westbound Route 90 connector to northbound Route 405 freeway and the eastbound Route 90 connector to the northbound Route 405 freeway. This will become the fifth lane of the northbound Route 405 freeway.
- b) Widen to two lanes and upgrade the geometrics on the southbound Route 405 (San Diego Freeway) connector to the westbound Marina Freeway.

As mentioned previously, mitigation measures are essential and must be implemented with or prior to the Phase I project if a reasonable level of traffic service for this region is to be maintained.

OTHER MITIGATIONS WE RECOMMEND FOR PHASE I ARE AS FOLLOWS:

Caltrans requires 30 feet set-back for large trees planted in a speed zone that is higher than 35 miles per hour. Planting street trees along Lincoln Boulevard should have sufficient set-back. Because Lincoln Boulevard is the border of the proposed wetland mitigation site, as transition, native wetland trees such as *Populus fremontii*, *Alnus rhombifolia*, *Platanus racemosa* or native oaks should be planted instead of palms or Moreton Bay Fig.

The trees planted along Lincoln Boulevard should be maintained by local agencies.

Some of the trees listed in the selection matrix are categorized wrong, such as *Pittosporum*, *Tristania conferta*, *Eucalyptus ficifolia* etc.

EXHIBIT NO. 1483
APPLICATION NO. 5.01 - 184
Caltrans

Mr. Tom Loftus
March 22, 1993
Page Four

Modifications of Route 90 have the potential for adverse impacts on Centinela Creek and an indirect negative impact on Ballona wetlands. The Caltrans Environmental Planning Branch should be kept apprised of those aspects of the Ballona restoration effort which may have an effect on the State Highway system in this area.

Under the proposed mitigation, Lincoln Boulevard would be adjacent to a freshwater wetlands. This would need to be taken into account in future planning efforts for any modifications to Lincoln Boulevard along the section south of the Jefferson Boulevard intersection. Coordination with Maguire Thomas Partners would be required if restoration work is conducted in Caltrans right-of-way.

There is a need for early contact with Caltrans on hazardous waste matters to enable the applicant to be familiar with Caltrans standards before construction.

The predicted noise levels, from traffic activity, for locations #3, 12, 21, and 23 in the vicinity of Lincoln Boulevard and locations #9, 18 and 19 in the vicinity of Centinela Avenue and the Marina Freeway were reviewed (see Vol. XI, Fig. 7, Noise Monitor Locations).

- a) Location #18, east of Centinela Avenue and Sepulveda intersection near Riggs Place has been predicted at a noise level of 69.4 dBA (Leq). Although no single family residences are affected in the immediate vicinity, the Pacifica Hotel may have 1st floor residences who may be impacted by increased future peak noise levels.
- b) Location #21, north of Jefferson Blvd. and east of Allard (in Ar D) has a internal noise level predicted at 68.8 dBA (Leq). This site receptor is far removed from Lincoln Boulevard to the west.
- c) There is no information in the Noise Impact Study for Area 'C' (residential) vis-a-vis future noise level for the Marina Freeway (Rte. 90).

Any work or construction to occur within State right-of-way, as well as any mitigation measures such as signalization, grading, widening, drainage or freeway mainline or ramp improvements which involve State right-of-way or costs which exceed \$300,000 will require a Project Studies Report and Encroachment Permit. Any measure which cost less than \$300,000 will require a Caltrans Encroachment Permit.

Final contract plans for work within the State Highway right-of-way must be reviewed by Caltrans Permits office early in the development process.

Any transport of heavy construction equipment which requires the use of oversize transport vehicles on State Highways will require a Caltrans Transportation Permit. We recommend that truck trips be limited to off-peak commute periods.

EXHIBIT NO. 164
APPLICATION NO. 5.01.184
Caltrans

Mr. Tom Loftus
March 22, 1993
Page Five

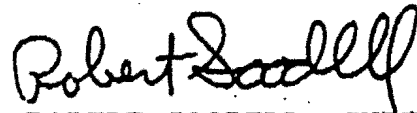
The CMP Transportation Impact Analysis Program and Deficiency Plan should include all State (Freeways and Highways) and an identification of deficiencies below the established level-of-service standards.

Other considerations should be given to mitigation for congestion relief, such as ridesharing, park-and-ride lots, and staging areas.

Also, we recommend that a Traffic Management Plan be developed, such as: construction traffic, parking, detours, lane closure, and alternate routes.

In general, prior to development application approval, the applicant will be required to submit a Transportation Demand Management Plan and a Focused Traffic Study for review and approval by the Director of Planning, and the Traffic Engineer, as appropriate, to determine the necessary improvements for impacts to State transportation facilities generated by the project.

If you have any questions regarding this response, please call Wilford Melton at (213) 897-1338.


ROBERT GOODELL, CHIEF
Advance Planning Branch

attachment: Proposed Mitigation Measures

cc: Richard Takase, City Planner
L.A. City Planning Department
Room 505, City Hall
200 N. Spring Street
Los Angeles, CA 90012

nh\10002MXX

EXHIBIT NO. 1625
APPLICATION NO. 501-184
Ca (trans

ATTENTION MEASURES		ATTENTION MEASURES	
Sub-Phase	Locations	Proposed/Described in EIR	Caltrans' response
1A	Lincoln Bl/Hughes Terr/Jefferson	Widen N/B to 4 Lanes and S/B to 3 lanes	Provide 4 lanes each direction
1B	Lincoln Bl at Culver Blvd.	None Proposed	Construct N/B Pk 1 to EB Culver connection. Reconstruct EB Culver to N/B Pk 1 connection.
1C	Lincoln Bl/Fly Way/Fly 90	Widen N/B to 4 lanes by removing traffic islands	Keep extant traffic islands. Provide 4 lanes in each dir. by widening in Ph. II.
	Culver Blvd-Lincoln/Fly 90	Deferred until Master Plan Mitigation	Widen to 4 lanes.
1D	Lincoln Bl/Jefferson/Balboa Cr.	Widen N/B to 4 Lanes and S/B to 3 lanes	Widen to 6 lanes + left & right turn lanes
1E	Lincoln Bl- Balboa Cr/Fly Way	Widen N/B to 3 lanes	Provide 4 lanes in each direction
1F	Lincoln Bl- La Tijera/Singh Ter.	Widen N/B to 4 lanes by removing traffic islands.	Provide 4 lanes in each direction
1G	EB 90 On-ramp from California	Widen ramp entrance to 3/7.	Ph. I Use 60/40 slip lane split, provide more S/B & turn storage at Manchester. Ph. II: Widen to provide 4 lanes in each direction.
1H	WB 90 On-ramp to California	Minor widening to permit 2 lanes to go to 3 lanes at the intersection.	Widen to 3 lanes and install on up metering with HOV By-Pass Lane
1I	Lincoln Bl at Jefferson Blvd.	None Proposed	DEIR Proposed stay
1J	N/B 405 On-ramp from Jefferson	Construct loop ramp for EB Jefferson On-ramp to N/B 405 close or reroute N/B On-ramp- Minor road work and resurfacing on WB Jefferson to provide longer left turn pocket.	Provide additional Intersection capacity Phase I - Grade sep. Phase II or cut-de-sec Jefferson at Culver.
1K	S/B 405 On-ramp from Jefferson	Widen EB Jefferson for right turn pocket to S/B On-ramp widen ramp entrance to 3 lanes	DEIR proposed use many substandard features which need justification. Caltrans believes most project traffic can be directed to 90 Fly.
1L	90 Connectors to N/B 405	None Proposed	DEIR Proposed should be augmented with HOV By-pass lane
	Centinella at Jefferson	None Proposed	Install connector metering and construct collector road for both the EB and WB 90 Connectors
1M	80 Fly at Culver Blvd	Widen N/B Culver at EB 90 On-ramp to provide a 2-lane right turn pocket and widen ramps at Culver to provide an additional lane	Provide additional Intersection capacity Ph. I - Grade sep. Ph. II
1N	90 Freeway	Reroute WB 90 Expy for about 800' to provide 3 lanes.	Continue 90 Fly over Culver by constructing grade sep. diamond interchange & provide a three lane WB off-ramp and a two lane EB on-ramp with HOV by-pass
1O	90 Expy at Minidunas	Widen EB and WB 90 Expy to provide additional thru and turning lanes (work to be done by the Channel Gateway Project).	Extend full freeway section from east of Balboa Creek across Culver Blvd.
1P	S/B 405 Connector to WB 90	None Proposed	Widen S/B Minidunas to provide 3 thru lanes and a 2-lane left turn pocket for width. Widen N/B Minidunas to provide 2 thru lanes and a left turn pocket.
	Bay St at Culver Blvd.	Deferred until Master Plan Mitigation	Widen Connector to 2 lanes
		Deferred until Master Plan Mitigation	Construct double left from WB Culver to Bay St.
		Deferred until Master Plan Mitigation	Construct 4 lanes from Culver Blvd. to Teale St.

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Required Road widening for Playa Vista Phase I:

5-01-223, A5-PLV-01-281

5-01-382; A-5-PLV-00-417

5-01-432; 5-01-184

Excerpts from:

- (1) City table of requirements
- (2) Opponents' list
- (3) City actual road conditions)

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ATTACHMENT "K" (Revised May 13, 1993 Due to Alternate Mitigations)
 TRANSPORTATION IMPROVEMENTS SUBPHASING PLAN
 PLAYA VISTA PHASE I MITIGATIONS

Subphase	Location	Program	Intersection/Street Improvements
1A	West end of Area D, north and south of Jefferson Boulevard	800 du 5,000 net retail 10,000 net office 15,000 net community serving	<ul style="list-style-type: none"> Connect southbound Lincoln to eastbound Culver - Widen Ballona Creek Bridge (a portion of east side) Improve Culver between new Culver/Lincoln connection and the Marina Freeway Complete construction of Bay Street between Jefferson Boulevard and existing Teale Street. If connection cannot be made to Teale Street, alternative improvements will be the construction of Lincoln/Jefferson intersection to ultimate design standards as described in DOT letter of September 16, 1992. Lincoln/Jefferson (northbound and southbound quadrants only) Provide funding for design of ATISAC and pre-emption systems for Lincoln Boulevard Transit Enhancement Program At grade improvements to Culver/Marina Freeway eastbound
1B	West end of Area D, north and south of Jefferson Boulevard	800 du 10,000 net retail 10,000 net office 25,000 net community serving	<ul style="list-style-type: none"> Widening of Lincoln Boulevard to provide 4 northbound and 3 southbound lanes between Hughes Terrace and Jefferson Boulevard Lincoln/Jefferson (Complete intersection improvements as required in September 16, 1992 letter) Widening of Jefferson Boulevard between Lincoln Boulevard and Bay Street Provision and operation of bus/demile service Culver/Jefferson La Tijera/I-405 Freeway northbound (cash contribution) Major Note
1C	West end of Area D, north and south of Jefferson Boulevard	800 du 5,000 net retail 10,000 net office	<ul style="list-style-type: none"> Widening of Lincoln Boulevard to provide 4 northbound and 3 southbound lanes between north of Jefferson Boulevard and Ballona Creek Bridge Add a third northbound lane on Lincoln Boulevard between Culver Connector and Fill Way Complete construction of Bay Street between "new" Teale Street and "B" Street Complete construction of "new" Teale Street between Lincoln Boulevard and Bay Street Widening of Jefferson Boulevard between Bay Street and west of Beechwood Complete funding of ATISAC and pre-emption systems for Lincoln Boulevard Transit Enhancement Program Culver/Nicholson Culver/Vista del Mar Lincoln/Mindanao
1D	West end of Area D, north and south of Jefferson Boulevard	846 du 20,000 net office 25,000 net community serving	<ul style="list-style-type: none"> Widening and addition of fourth northbound lane on Lincoln between La Tijera and Hughes Terrace Construction of "new" Teale Street between Bay Street and the terminus east of 7th Street within First Phase west end Provision and operation of two transit vehicles for Lincoln corridor (plus a spare bus) Candela/Marina Freeway eastbound Candela/Marina Freeway westbound Jefferson/I-405 Freeway—westbound right turn improvements at the existing northbound on-ramp Jefferson/I-405 Freeway—eastbound right turn improvements at the existing southbound on-ramp
1E	West end of Area D, north of Jefferson Boulevard	350,000 net office 5,000 net retail	<ul style="list-style-type: none"> Provide funding and design for ATISAC on Jefferson Boulevard between Beechwood and Candela Provision and operation of two additional transit vehicles for Lincoln corridor Provide a Caltrans approved project study report (PSR) for the grade separated improvement at Culver and Marina Freeway Construction of Bay Street bridge over Ballona Creek and Bay Street between B Street and Culver Widening of Candela Avenue between Jefferson Boulevard and north of Juanele Street Candela/Culver Candela/Short Culver/Tinglewood Manchester/Pershing Marina Freeway eastbound/Mindanao Marina Freeway westbound/Mindanao Candela/Jefferson (complete intersection improvement)
1F	East end of Area D	850,000 net office 10,000 net retail 300 hotel rooms 55,000 net community serving	<ul style="list-style-type: none"> Option B improvements to Candela Avenue between the Marina Freeway and Juanele Street Complete construction of "E" Street from 9th Street to Candela before occupancy of any office space in 1F Construction of Candela Avenue south between Jefferson Boulevard and B Street Construction of Teale Street between 11th Street and existing Candela Avenue connection to Major Street Widening of existing Candela Avenue between Jefferson and Mesmer Avenue Widening of Jefferson between Candela and I-405 Freeway Guarantee the westbound portion of the grade separation at Culver/Marina Freeway prior to occupancy of any office space in 1F and complete construction of the westbound grade separation prior to occupancy beyond 200,000 net office space in 1F Candela/La Tijera Candela/La Tijera All intersection improvements along Sepulveda Boulevard between Howard Hughes Parkway and Lincoln Boulevard Major/Mesmer

Notes: 1. For a complete description of transportation improvements, refer to DOT letters dated September 16, 1992 and May 13, 1993, corresponding drawings, and attachments.

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CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Revised (May 24, 1993)

Lincoln Bl. & Jefferson Bl.
DOT Case No. CTC 91-025

Date: May 13, 1993

To: Merryl Edelstein, Senior Planner
Attn: Dick Takase, City Planner
Department of City Planning

From: *Haripal S. Vir*
Haripal S. Vir, Senior Transportation Engineer
Department of Transportation

Subject: PLAYA VISTA PROJECT - PHASE I
AMENDMENT TO THE INITIAL TRAFFIC ASSESSMENT AND
MITIGATION LETTER DATED SEPTEMBER 16, 1992
EIR NO. 90-0200 (C) (CUB) (CUZ) (GPA) (SUB) (VAC) (ZC)

This letter amends our traffic assessment letter dated September 16, 1992. With the release of the project's Draft EIR in September 1992 and receipt of several comments on the proposed traffic mitigation measures, it became necessary to propose alternate mitigation measures at certain intersections. It should be noted that the Playa Vista Phase I mitigation measures adequately mitigated the traffic impacts as described in the Draft EIR. However, due to numerous requests for alternate access to the Marina Freeway and Caltrans' concerns regarding the proposed northbound "loop ramp" at the Jefferson Boulevard / I-405 freeway interchange, the Department of Transportation recommends alternate mitigation requirements which affect the following intersections/street segments:

- Lincoln Boulevard/Culver Boulevard interchange
- Bay Street bridge and connection to Culver Boulevard
- Culver Boulevard / Marina Freeway interchange
- Jefferson Boulevard between Lincoln Boulevard and San Diego Freeway
- Centinela Avenue between Marina Freeway and Jefferson Boulevard

The proposal is to construct a new ramp connection from northbound Lincoln Boulevard to eastbound Culver Boulevard and the Bay Street connection to Culver Boulevard (over Ballona Creek Channel) in order to provide a new access to Culver Boulevard and the Marina Freeway. This alternate mitigation will provide motorists on Lincoln Boulevard and Jefferson Boulevard with an alternate access route to the northbound San Diego Freeway via Culver Boulevard and Marina Freeway. These regional roadway improvements will

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divert traffic and, thereby, relieve congestion on Jefferson Boulevard between Lincoln Boulevard and the San Diego Freeway (including Jefferson Boulevard at San Diego Freeway northbound ramps) and on Centinela Avenue between Jefferson Boulevard and Culver Boulevard.

In addition to Caltrans' comments, there were a number of additional concerns from local jurisdictions and municipalities including the City of Santa Monica. The City of Santa Monica requested that impacts within the City of Santa Monica be re-evaluated using an alternate traffic assignment. In the process of doing this, a new impact was identified at the intersection of Main Street and Rose Avenue in Los Angeles. The City of Santa Monica also requested that the intersection of Centinela Avenue and Short Avenue be evaluated. This resulted in an additional impact. The signalized intersection of Centinela/Washington immediately north of Short Avenue was also analyzed and found to be not impacted.

These two additional impacted intersections change the Phase I impacted intersections to a total of 54 intersections (including 50 within the City of Los Angeles, 3 in Los Angeles County, and 1 in Culver City) which can be fully or partially mitigated. These additional intersections are summarized as follows:

- Centinela Avenue and Short Avenue
- Main Street and Rose Avenue

Due to these alternate mitigation requirements and additional impacted intersections, our traffic assessment letter dated September 16, 1992 is revised as follows:

A. Paragraph on Page 3 of the September 16, 1992 Assessment Letter

Replace the paragraph on Page 3 of the letter that reads:

"Three of the remaining five intersections, as stated below, can be only partially mitigated and will yield a projected level of service (LOS) of C or better with the proposed mitigations. Generally, DOT considers any intersections functioning at LOS C or better to be at a good operating condition.

- Centinela Avenue and Mesmer Avenue
- Jefferson Boulevard and Mesmer Avenue

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- Jefferson Boulevard and Mesmer Avenue
- Jefferson Boulevard and San Diego Freeway southbound ramp"

with the following text:

"Four of the remaining six impacted intersections, as stated below, can be only partially mitigated; however the projected levels of service (LOS) will be C or better with the proposed mitigations. Generally, DOT considers any intersection functioning at LOS C or better to be at a good operating condition. Additionally, the mitigations provided by the project at other intersections in the vicinity of these four intersections would add capacity in excess of that needed by the project impact. DOT considers these mitigations sufficient to offset the residual significant impact at the following intersections:

- Centinela Avenue and Mesmer Avenue
- Centinela Avenue and Teale Street
- Jefferson Boulevard and Mesmer Avenue
- Jefferson Boulevard and San Diego Freeway southbound ramp"

and add the following text:

"With the alternate mitigation for Jefferson Boulevard/I-405 northbound ramps, four of the remaining six impacted intersections, as stated below, can be only partially mitigated and will yield a projected level of service (LOS) A or B as shown below with the proposed mitigations. Level of Service A is the highest quality of service a particular highway or intersection can provide. Level of Service B represents an intersection which operates well. Additionally, the mitigations provided by the project at other intersections in the vicinity of these four intersections would add capacity in excess of that needed by the project impact. DOT considers these mitigations sufficient to offset the residual significant impact at these intersections.

- Centinela Avenue and Mesmer Avenue (LOS A)
- Centinela Avenue and Teale Street (LOS A)
- Jefferson Boulevard and Mesmer Avenue (LOS B)
- Jefferson Boulevard and McConnell Avenue (LOS A)"

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B. Attachment "E" - Phase I Impact and Mitigation Summary

The Phase I - Attachment "E" - Impact and Mitigation Summary (LOS Table), has been updated for several reasons. First of all, alternate mitigation requirements will result in rerouting of traffic; hence the volume to capacity (V/C) ratios and corresponding levels of service at a number of intersections have been revised. Secondly, the recently constructed LAX ATSAC system along the Lincoln Boulevard and Sepulveda Boulevard corridors improved the existing LOS at several intersections which in turn prompted changes to the LOS Table. And finally, the two intersections of Centinela/Short and Main/Rose as discussed on page 2 were added to the LOS Table as newly impacted study intersections. Please see the revised Attachment "E". The list of affected intersections is as follows:

- ▶ Alla Rd. and Jefferson Blvd. (rerouting)
- ▶ Bali Wy. and Lincoln Blvd. (correction)
- ▶ Beethoven St. and Jefferson Blvd. (rerouting)
- ▶ Centinela Ave. and Culver Blvd. (rerouting)
- ▶ Centinela Ave. and Jefferson Blvd. (rerouting)
- ▶ Centinela Ave. and Marina Freeway EB Ramps (rerouting)
- ▶ Centinela Ave. and Marina Freeway WB Ramps (rerouting)
- ▶ Centinela Ave. and Short Ave. (addition)
- ▶ Century Blvd. and Sepulveda Blvd. (LAX ATSAC)
- ▶ Culver Blvd. and Marina Freeway EB Ramps (rerouting)
- ▶ Culver Blvd. and Marina Freeway WB Ramps (rerouting)
- ▶ Hughes Terrace and Lincoln Blvd. (LAX ATSAC)
- ▶ Inglewood Blvd./Centinela Ave. and Jefferson Blvd. (rerouting)
- ▶ Jefferson Blvd. and Lincoln Blvd. (rerouting)
- ▶ Jefferson Blvd. and McConnell Ave. (rerouting)
- ▶ Jefferson Blvd. and Mesmer Ave. (rerouting)
- ▶ Jefferson Blvd. and San Diego Freeway NB Ramps (rerouting)
- ▶ Jefferson Blvd. and San Diego Freeway SB Ramps (rerouting)
- ▶ Jefferson Blvd. and Westlawn Ave. (rerouting)
- ▶ Lincoln Blvd. and Loyola Blvd. (LAX ATSAC)
- ▶ Lincoln Blvd. and Manchester Ave. (LAX ATSAC)
- ▶ Lincoln Blvd. and Sepulveda Blvd. (LAX ATSAC)
- ▶ Main St. and Rose Ave. (addition)
- ▶ Manchester Ave. and Sepulveda Blvd. (LAX ATSAC)

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C. **Attachment "G" - Intersection Mitigation Descriptions Revised/Added/Deleted**

A revised supplemental traffic analysis (dated April, 1993) has been prepared by Barton Aschman Associates, the traffic consultants, to assess the benefits of the new connection to Culver Boulevard and the additional impacts of the diverted traffic resulting from the improvements proposed as an alternate to the Jefferson Boulevard "loop ramp" at San Diego Freeway. After a careful review of the supplemental traffic analysis, DOT has determined that the project-related traffic impacts can be adequately mitigated with the following changes to the mitigation requirements stated in our letter dated September 16, 1992. Attachment "G" of the September 16, 1992 Assessment Letter is amended as stated below:

Additional Required Physical Roadway and Intersection Improvements - The following improvements should be added to the "description of physical roadway and intersection improvements":

1. Bay Street Bridge (additional) - (see attached Drawings "BB-1", "BB-2" signed May 6, 1993)
 - a. Construct the Bay Street Bridge to City standards over the Ballona Creek Channel with an 80-foot roadway and two 10-foot (minimum) sidewalks to connect north of Jefferson Boulevard and Culver Boulevard.
 - b. Stripe Bay Street between Culver Boulevard and "B" Street to provide two through lanes in both the northbound and southbound directions.
 - c. Bike lanes should be provided from Ballona Creek Bridge southerly. Construct ingress and egress to provide access to the existing bike path along the north levee of the Ballona Creek.

This improvement would require approval and coordination of the Los Angeles County Flood Control and the Army Corps of Engineers.

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2. Bay Street and Culver Boulevard (additional) - (see attached Drawing "AA-1", "AA-2" signed May 6, 1993)

- a. Dedicate property and improve both sides of Culver Boulevard from Lincoln Boulevard to a point approximately 640 feet easterly of Bay Street centerline to provide up to a 74-foot roadway within a 92 to 94-foot right-of-way.
- b. Stripe Culver Boulevard to provide one through lane and one shared through/right-turn lane in the eastbound direction and two left-turn only lanes and two through lanes in the westbound direction.
- c. Stripe Bay Street to provide two through lanes in the southbound direction and one shared left-turn/right-turn lane and one right-turn only lane in the northbound direction.
- d. Concurrent with LADOT's determination as to warrants for a traffic signal, the applicant is required to fund the design and installation of a traffic signal at this intersection.

3. Centinela Avenue and Short Avenue (additional)

The proposed project can mitigate the project-related traffic impacts at this intersection by contributing \$120,000 to an improvement project programmed at this location in the City's Five Year Capital Improvement Program.

4. Culver Boulevard and Lincoln Boulevard Interchange, "south-east quadrant" (additional) - (see attached Drawing "AA-1" signed May 6, 1993)

- a. Dedicate, construct, and realign the existing ramp to provide a new interchange in the south-east quadrant of Lincoln Boulevard and Culver Boulevard to provide two separate roadways connecting (1) the northbound Lincoln Boulevard to the eastbound Culver Boulevard and, (2) the eastbound/westbound Culver Boulevard to the northbound Lincoln Boulevard.

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- b. Restripe Lincoln Boulevard at the interchange turn-off to provide three through lanes and one right turn only lane in the northbound direction.
- c. Widen a portion of the Lincoln Boulevard bridge over Ballona Creek on the east side to accommodate the northbound right-turn only lane at the new interchange turn-off.
- d. Restripe Culver Boulevard at the interchange to provide one left-turn only lane and one through lane in the westbound direction.
- e. Concurrent with LADOT's determination as to warrants for a traffic signal, the applicant is required to fund the design and installation of a traffic signal at this intersection.

This improvement would require the coordination and approval of the County of Los Angeles, Caltrans, Los Angeles County Flood Control, and the Army Corps of Engineers.

5. Culver Boulevard and Marina Freeway (Route 90) Grade Separation (additional) - (see attached Drawings "AA-2", "AA-3", and "AA-4" signed May 6, 1993)

Design a complete grade separation at the Culver/Route 90 interchange and complete the construction as described below:

- a. Westbound Grade Separation - Guarantee the westbound portion prior to the issuance of any certificate of occupancy of office space in sub-phase 1F and complete construction of the westbound portion of the grade separation between Ballona Creek and a point approximately 1400 feet westerly of the Culver Boulevard centerline before the issuance of any certificate of occupancy beyond the initial 200,000 square feet of office space in the sub-phase 1F of Phase I Playa Vista.
- b. Eastbound Grade Separation - Complete the eastbound portion of the grade separation in sequence with the westbound portion if adequate funding is provided by other sources including the Playa Vista Master Plan project, other developments, or public funding sources. This

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portion should be completed within 3 years of the availability of funding and approval of permits unless otherwise conditioned in future Playa Vista Master Plan conditions beyond Phase I.

The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

6. Main Street and Rose Avenue (additional) - (see attached Drawing "CC-1" signed May 6, 1993)
- a. Widen the east side of Main Street by 7 feet between Rose Avenue and the alley located approximately 180 feet southerly of the Rose Avenue centerline to provide a 34-foot half roadway and a 7 to 9-foot sidewalk within the existing right-of-way.
 - b. Restripe Main Street to provide one left-turn only lane, one through lane and one shared through/right-turn lane in the northbound and southbound directions.
 - c. Widen the south side of Rose Avenue by 5 feet adjacent to the island/parking lot west of Main Street to provide a 25-foot half roadway and a 10-foot sidewalk within the existing 35-foot half right-of-way.
 - d. Restripe Rose Avenue to provide one left-turn only lane, one through lane and one right-turn only lane in the eastbound direction.
 - e. Restripe the City-owned off-street parking lot on the southwest corner of the intersection. Also, relocate the parking meters (if necessary) and set-back the chain-linked fence (northerly boundary) further south.
 - f. This improvement in street capacity requires on-street parking prohibition at all times on the west side of Main Street between a point approximately 110 feet south of Rose Avenue and a point approximately 180 feet southerly of Rose Avenue. This prohibition will cause parking impacts and reduces the on-street parking by 3 spaces.

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The project-related impact can be mitigated through improvements only on Main Street. The cost of improvements on Rose Avenue and the parking lot could be funded through the Coastal Transportation Corridor Transportation Fund subject to the approval of City Council.

Additional ATSAC Improvements - The following ATSAC improvement should be added to Attachment "G" of the September 16, 1992 Assessment Letter:

1. Jefferson Boulevard and Westlawn Avenue (additional)

Contribute to the design and construction of the Mar Vista Automated Traffic Surveillance and Control (ATSAC) System.

Revised Physical Street and Intersection Improvements - The "descriptions of the physical roadway and intersection improvements", as stated in Attachment "G" of the September 16, 1992 Assessment Letter, are revised as follows:

1. Alla Road and Jefferson Boulevard (revised) - page 2, 3: item 1: (see attached Drawing "A-3" signed May 6, 1993)

Revise the description of street improvement as follows:

- a. Dedicate up to 14 feet of property and widen the south side of Jefferson Boulevard up to 12 feet along the project frontage between Bay Street and a point approximately 980 feet easterly of Alla Road to provide up to a 54-foot half roadway within a 64-foot half right-of-way.
- b. Remove the raised median islands on Jefferson Boulevard between Bay Street and a point approximately 700 feet easterly of Alla Road. Relocate and modify traffic signal equipment as required.
- c. Restripe Jefferson Boulevard at both Alla Road and Bay Street to provide one left-turn only lane, three through lanes and one shared through/right-turn lane in both the eastbound and westbound directions and midblock two-way left-turn lanes.

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- d. Dedicate and construct the extension of new Alla Road south of Jefferson Boulevard to a 54-foot roadway within a 78-foot right-of-way in order to provide one left-turn only lane, one shared through/right-turn lane and one right-turn only lane in the northbound direction. Restripe Alla Road north of Jefferson Boulevard to provide two left-turn only lanes, one shared through/right-turn lane and one right-turn only lane in the southbound direction.
 - e. Contribute to the design and construction of the Mar Vista Automated Traffic Surveillance and Control (ATSAC) System at Alla Road and Jefferson Boulevard.
 - f. Dedicate, construct and realign new Bay Street, north of Jefferson Boulevard, approximately 200 feet westerly of the existing Bay Street to provide a 94-foot roadway within a 118-foot right-of-way, as proposed by the applicant, between Jefferson Boulevard and the Ballona Creek Flood Control Channel.
 - g. Restripe Bay Street to provide one left-turn only lane, two through lanes and one bike lane in both the northbound and southbound directions.
2. Inglewood Boulevard/Centinela Avenue and Jefferson Boulevard (revised) - pages 15, 16; item 24; (see attached Drawing "A-6", "A-7", and "A-9" signed May 6, 1993)

Revise the description of intersection improvement as follows:

- a. Dedicate property and improve the south side of Centinela Avenue along the project frontage between Inglewood Boulevard and Major Street as stated in the description of improvement at Centinela Avenue and Teale Street (Intersection No. 12, paragraph "a" from the assessment letter dated September 16, 1992)
- b. Remove the raised median islands on Jefferson Boulevard between Centinela Avenue and Inglewood Boulevard. Install an overhead guide sign on Jefferson Boulevard west of Inglewood Boulevard for the

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eastbound traffic. Relocate and modify traffic signal equipment as required.

- c. Restripe Jefferson Boulevard to provide one left-turn only lane and three through lanes in the eastbound direction and one left-turn only lane, two through lanes and one shared through/right-turn lane in the westbound direction and midblock two-way left-turn lanes.
- d. Restripe Centinela Avenue to provide two left-turn only lanes, one shared through/left-turn lane and one shared through/right-turn lane in the northbound direction.
- e. Close the opening in the raised median island on the southwest corner of the intersection 200 feet west of Inglewood Boulevard to eliminate unsafe turning movements.
- f. These improvements require on-street parking prohibitions on the south side of Jefferson Boulevard from Inglewood Boulevard to point approximately 390 feet easterly of the Inglewood Boulevard centerline which will cause parking impacts and reduce on-street parking spaces by 5 spaces during the entire day. Also, on-street parking will be restricted on the north side of Jefferson Boulevard between Inglewood Avenue and Margaret Avenue during both the a.m. and p.m. peak periods to provide the required street capacity. These restrictions will cause parking impacts and reduce on-street parking by 19 spaces during the peak hours.
- g. In addition, prohibit on-street parking on the east side of Inglewood Boulevard between Jefferson Boulevard and Juniette Street and the west side of Inglewood Boulevard from Jefferson Boulevard to a point approximately 220 feet northerly of the Jefferson Boulevard centerline. These restrictions will cause parking impacts and reduce on-street parking by 8 spaces.

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3. Centinela Avenue and Jefferson Boulevard (revised) - pages 5, 6: item 5: (see attached Drawing "A-7" signed May 6, 1993)

Revise the description of intersection improvement as follows:

- a. Dedicate up to 24 feet of property and widen the south side of Jefferson Boulevard up to 22 feet along the project frontage from a point approximately 940 feet westerly of the Centinela Avenue centerline to a point approximately 910 feet easterly of the centerline to provide up to 64-foot half roadway within a 74-foot half right-of-way.
- b. Dedicate and construct the extension of new Centinela Avenue south of Jefferson Boulevard to a 108-foot roadway within a 132-foot right-of-way in order to provide two left-turn only lanes, three through lanes and one right-turn only lane in the northbound direction. Restripe Centinela Avenue north of Jefferson Boulevard to provide two left-turn only lanes, two through lanes and one shared through/right-turn lane in the southbound direction. It should be noted that the applicant is proposing to dedicate property and improve Centinela Avenue beyond the City's major highway standard to provide a 108-foot roadway within a 132-foot right-of-way.
- c. Remove the raised island on the northwest corner of the intersection and also the raised median islands on Jefferson Boulevard from a point approximately 320 feet easterly of Grosvenor Boulevard centerline to Inglewood Avenue. Relocate and modify traffic signal equipment as required.
- d. Widen both the east and west sides of Centinela Avenue by 5 feet from Jefferson Boulevard to a point approximately 450 feet northerly of the Jefferson Boulevard centerline to provide a 84-foot roadway within the existing 100-foot right-of-way.
- e. Restripe Jefferson Boulevard to provide two left-turn only lanes, three through lanes and one right-turn only lane in both the eastbound and westbound directions.

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- f. Contribute to the design and construction of the Mar Vista ATSAC System.
- 4. Centinela Avenue widening between the Marina Freeway (SR 90) and Jefferson Boulevard - Pages 6, 7: item 5: Option "B" (see attached Drawings "C-1(1)" through "C-3(1)")

Delete Option "A" entries. Substitute Option "B" as follows:

Projected-related traffic impacts on Centinela Avenue between Jefferson Boulevard and the Marina Freeway can be mitigated by providing six continuous through lanes in both the northbound and southbound directions during the a.m. and p.m. peak periods. This segment of Centinela Avenue is under the jurisdiction of the County of Los Angeles and any improvements must be coordinated with and approved by the County of Los Angeles.

- a. These improvements require on-street parking restrictions on both the east and west sides of Centinela Avenue between Jefferson Boulevard and the Marina Freeway. These restrictions will cause parking impacts and reduce on-street parking by 86 spaces during both the a.m. and p.m. peak periods.
- b. In addition, access to Juniette Street at Centinela Avenue shall be restricted to right-turn inbound and outbound in both the eastbound and westbound directions. This will cause operational traffic impacts at Centinela Avenue and Juniette Street.
- 5. Culver Blvd and the Marina Freeway (SR 90) eastbound ramps (revised) - page 13: item 16 - (see attached Drawing "AA-2" and "AA-3" signed May 6, 1993)

Revise the description of the intersection improvement as follows:

- a. Dedicate property along the project frontage on both sides of Culver Boulevard between the southerly property line of the 90-foot railroad right-of-way and a point approximately 480 feet southerly of the Marina Freeway eastbound ramp centerline to provide up to 106-foot

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right-of-way. Widen both the east and west sides of Culver Boulevard from the Marina Freeway eastbound ramps to a point approximately 480 feet southerly to provide up to 86-foot roadway, a 10-foot sidewalk on the south side and 10-foot dirt shoulder on the north side within a 106-foot right-of-way.

- b. Widen both the north and south sides of the Marina Freeway eastbound roadway from Culver Boulevard to a point approximately 680 feet easterly of the Culver Boulevard centerline to provide up to a 48-foot roadway. Restripe the roadway for three lanes in the eastbound direction.
- c. Restripe Culver Boulevard to provide two through lanes and two right-turn only lanes in the northbound direction and one left turn only lane and three through lanes in the southbound direction.
- d. Relocate and modify signal equipment as required.

The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

6. Culver Boulevard and the Marina Freeway (SR 90) westbound ramps (revised)
- page 13, 14: item 17 - (see attached Drawing "AA-3" signed May 6, 1993)

Revise the description of the intersection improvement as follows:

- a. Widen both sides of the Marina Freeway westbound off-ramp from Culver Boulevard to a point approximately 420 feet easterly of the Culver Boulevard centerline to provide up to a 60-foot roadway.
- b. Widen the east side of Culver Boulevard by 2 feet from the Marina Freeway westbound roadway to a point approximately 340 feet northerly of the Marina Freeway westbound roadway centerline to provide a 42-foot half roadway and an 8-foot sidewalk within the existing 50-foot half right-of-way.
- c. Relocate and modify signal equipment as required.

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The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

7. Jefferson Boulevard and McConnell Avenue (deleted) - (see September 16, 1992 Assessment Letter, Attachment "G" page 18, item 26)

Delete the description of the intersection improvement that reads:

- "a. Dedicate 14 feet of property and widen the south side of Jefferson Boulevard by 12 feet along the project frontage from Beethoven Street to Westlawn Avenue to provide a 54-foot half roadway within a 64-foot half right-of-way.
- b. Remove the raised median islands on Jefferson Boulevard between Beethoven Street and Westlawn Avenue. Relocate and modify traffic signal equipment as required.
- c. Restripe Jefferson Boulevard to provide one left-turn only lane and four through lanes in the eastbound direction and three through lanes and one shared through/right-turn lane in the westbound direction and midblock two-way left-turn lanes between Beethoven Street and Westlawn Avenue."

8. Jefferson Boulevard and Westlawn Avenue (deleted) - (see September 16, 1992 Assessment Letter, Attachment "G" page 20, item 30)

Delete the description of the intersection improvement that reads:

- "a. Dedicate 14 feet of property and widen the south side of Jefferson Boulevard by 12 feet along the project frontage from McConnell Avenue to a point approximately 800 feet easterly of the Westlawn Avenue centerline to provide a 54-foot half roadway within a 64-foot half right-of-way.
- b. Remove the raised median islands on Jefferson Boulevard between McConnell Avenue and Centinela Avenue. Relocate and modify traffic signal equipment as required.

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- c. Restripe Jefferson Boulevard to provide one left-turn only lane and four through lanes in the eastbound direction and three through lanes and one shared through/right-turn lane in the westbound direction and midblock two-way left-turn lanes between McConnell Avenue and Centinela Avenue."

9. Jefferson Boulevard and the San Diego Freeway (I-405) northbound ramps (revised) - page 19; item 28; (see attached Drawing "A-11" signed May 6, 1993)

Revise the description of the intersection improvement as follows:

- a. Widen the north side of Jefferson Boulevard up to 8 feet from the San Diego Freeway northbound on-ramp to a point approximately 180 feet easterly of the on-ramp centerline to provide up to a 52-foot half roadway and a 10-foot sidewalk. This widening may require the construction of a retaining wall on the north side of Jefferson Boulevard. Relocate, modify, and remove traffic signal equipment as required. The east leg of the intersection is under the jurisdiction of Culver City and any improvements must be coordinated with and approved by Culver City.
- b. Widen both the east and west sides of the San Diego Freeway northbound on-ramp up to 6 feet from Jefferson Boulevard to a point approximately 400 feet northerly of the Jefferson Boulevard centerline to provide up to a 40-foot roadway. This widening may require the construction of a retaining wall on the east and/or west side(s) of the San Diego Freeway northbound on-ramp. Relocate, modify, and remove ramp metering equipment as required.
- c. Restripe the San Diego Freeway northbound on-ramp to provide three traffic lanes.
- d. Modify raised median island on Jefferson Boulevard (west leg) to facilitate left turns from the San Diego Freeway northbound off-ramp to the westbound Jefferson Boulevard.

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The San Diego Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

10. Jefferson Boulevard and the San Diego Freeway (I-405) southbound ramps (revised) - page 20: item 29 -(see attached Drawing "A-11" signed May 6, 1993)

Revise the description of the intersection improvement as follows:

- a. Widen the south side of Jefferson Boulevard by 12 feet from the San Diego Freeway southbound on-ramp to a point approximately 270 feet westerly of the on-ramp centerline to provide a 56-foot half-roadway and a 10-foot sidewalk within the existing right-of-way.
- b. Widen the east side of the southbound on-ramp up to 7 feet from Jefferson Boulevard to a point approximately 580 feet southerly of the Jefferson Boulevard centerline and widen the west side up to 5 feet from Jefferson Boulevard to a point approximately 365 feet southerly of the Jefferson Boulevard centerline to provide up to a 40-foot roadway. This widening may require the construction of retaining wall on both the east and west sides of the on-ramps. Restripe the on-ramp for three lanes in the southbound direction.
- c. Modify raised median island on Jefferson Boulevard to facilitate westbound left turns to the San Diego Freeway southbound on-ramp.
- d. Restripe Jefferson Boulevard to provide four through lanes and one right-turn only lane in the eastbound direction and two left-turn only lanes and two through lanes in the westbound direction.
- e. Contribute to the design and construction of the Mar Vista ATSAC System.
- f. Modify and relocate signal equipment as required.

The San Diego Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

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11. ATSAC Systems (page 28 of Attachment "G")

Change the total number of intersections where ATSAC is required from 21 to 22 and add to the list on page 29 the following:

"34. Jefferson Boulevard and Westlawn Avenue"

D. Attachment "J" - Lincoln Boulevard Transit Enhancement Program

Replace the last paragraph on page 2 that reads:

"Implementation of the transit system will occur on a phased basis. Two buses will be put into service prior to occupancy of subphase 1C, and an additional two vehicles prior to occupancy of subphase 1E. Funding for the design of the ATSAC and pre-emption system will occur during subphase 1A, and funding of the construction of both systems will occur prior to the issuance of building permits for subphase 1B, with the intention of establishing an operational system prior to occupancy of subphase 1B (subject to Caltrans approval). The pre-emption hardware for 20 other vehicles shall be made available upon completion of ATSAC construction."

with the following text:

"Implementation of the transit system will occur on a phased basis. Two buses plus a spare bus will be put into service prior to occupancy of subphase 1D, and an additional two vehicles prior to occupancy of subphase 1E. Funding for the design of the ATSAC and pre-emption system will occur during subphase 1A, and funding of the construction of both systems will occur prior to the issuance of building permits for subphase 1C, with the intention of establishing an operational system prior to occupancy of subphase 1C (subject to Caltrans approval). The pre-emption hardware for 20 other vehicles shall be made available upon completion of ATSAC construction."

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E. Phasing of Phase I Mitigation Measures - Attachment "K"

Sub-phasing of mitigation measures and street improvements were discussed on page 8 of the September 16, 1992 letter and in Attachment "K". Because of the alternate mitigation measures and other changes discussed herein, Attachment "K" has also been revised (May 13, 1993) and is attached hereto.

F. Parking Impacts

The table in Paragraph 5 (Phase I Parking Impacts) on Page 8 of the September 16, 1992 Assessment Letter is revised as follows:

1. For Centinela Avenue, revise the number of spaces eliminated during the peak hours from "44" spaces to "71" spaces.
2. For Main Street and Rose Avenue, "3" spaces will be eliminated for the entire day.
3. Revise the total number of spaces eliminated during the peak hours from "117" spaces to "144" spaces; and the total number of spaces eliminated for the entire day from "73" spaces to "76".
4. Attachment "L" to the September 16, 1992 letter would also require revision but is not attached to simplify this letter.

This completes our amendment to our September 16, 1992 letter as it relates to the alternate mitigation package, additions, and corrections. All remaining parts of that letter and attachments are unchanged. However, we would like to re-emphasize the narrative on pages 4 and 5 of the September 16, 1992 letter which states in part:

"It is important to note that the feasibility of the street widenings and the narrowing of the sidewalks must be determined further by the Bureau of Engineering, Department of Public Works. In addition, all mitigation measures, project development, and associated permitting shall be coordinated in accordance with a phasing plan described in Attachment "K", as revised on May 13, 1993.

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May 13, 1993

"The proposed street and signal improvements on City streets in each phase must be guaranteed through the B-Permit process of the Bureau of Engineering, Department of Public Works, before the issuance of any building permit in accordance with the phasing plan and completed before the issuance of any temporary or permanent certificate of occupancy, to the satisfaction of DOT and Bureau of Engineering.

"All improvements along state highways and along freeway on-ramps and off-ramps require approval from the State of California Department of Transportation (Caltrans). In addition, an encroachment permit must be obtained from Caltrans for each of these improvements before the issuance of any building permit, to the satisfaction of Caltrans, DOT and Bureau of Engineering in accordance with the phasing plan. In the event, the applicant is unable to obtain encroachment permits or other approvals from Caltrans for State highway improvements in a timely fashion, a temporary certificate of occupancy may be granted provided the applicant has demonstrated all reasonable efforts and due diligence to complete the necessary permitting and improvements in a timely fashion to the satisfaction of DOT."

If you have any questions, please feel free to call David Leatherman or Jay Kim of our Department at (213) 485-1062.

jwk:amend-pl.ltr

Attachments:

"E" Phase I Impact and Mitigation Summary (revised)

"K" Transportation Improvements Subphasing Plan - Phase I (revised)

Mitigation Drawings - (16 alternate drawings and 1 additional drawing)

cc: Sixth Council District
Tom Conner/Allyn Rifkin, DOT
DOT Design Division
DOT ATSAC Division
DOT Bikeway Division
DOT Western District Office
WLA Engineering District Office

Caltrans
County of Los Angeles
City of Culver City
Maguire Thomas Partners
Barton-Aschman Associates
Psomas and Associates

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ATTACHMENT "E" (Revised 5/13/93)
Playa Vista Phase I
Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwng Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation			Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS		
1	A-3	Alla Rd & Jefferson Blvd	AM	0.278	A	0.592	A	0.972	E	+0.380	0.569	A	See footnote 9	
			PM	0.396	A	0.616	B	1.120	F	+0.504	0.538	A		
2		Bali Way & Lincoln Blvd	AM	0.469	A	0.808	D	0.876	D	+0.068	0.825	D	See footnote 1 and 13	
			PM	0.785	C	1.224	F	1.284	F	+0.060	1.238	F		
3	A-4	Beethoven St & Jefferson Blvd	AM	0.329	A	0.415	A	0.610	B	+0.195	0.416	A	See footnote 9	
			PM	0.440	A	0.540	A	0.745	C	+0.205	0.517	A		
4	E-1	Centinela Ave & Culver Blvd Option "A" (DOT Preferred)	AM	0.730	C	0.927	E	1.039	F	+0.112	0.870	D	See footnote 9	
			PM	0.800	C	1.032	F	1.119	F	+0.087	0.891	D		
	E-2	Option "B"	AM							0.924	E	See footnote 9		
			PM							0.928	E			
		Option "C"	AM							0.969	E			
			PM							1.049	F			
5	A-7	Centinela Ave & Jefferson Blvd	AM	0.940	E	1.168	F	1.874	F	+0.706	0.888	D	See footnote 9	
			PM	0.884	D	1.058	F	1.889	F	+0.831	0.943	E		
C-1,2,3 Centinela Ave between Marina Freeway and Jefferson Blvd Options "A" and "B"														
6	F	Centinela Ave & La Cienega Blvd	AM	1.060	F	1.271	F	1.291	F	+0.020	1.143	F		
			PM	1.291	F	1.474	F	1.494	F	+0.020	1.345	F		

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Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwg Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
7	F	Centinela Ave & La Tijera Blvd	AM	1.018	F	1.123	F	1.131	F	+0.008	1.129	F	
			PM	0.832	D	1.046	F	1.071	F	+0.025	1.039	F	
8	C-3(2)	Centinela Ave & Marina Fwy EB Ramps	AM	0.593	A	0.676	B	0.815	D	+0.139	0.549	A	See footnote 9
			PM	0.551	A	0.679	B	0.898	D	+0.219	0.644	B	
9	C-3(2)	Centinela Ave & Marina Fwy WB Ramps	AM	0.710	C	0.863	D	1.075	F	+0.212	0.788	C	See footnote 9
			PM	0.733	C	0.915	E	0.975	E	+0.060	0.687	B	
10	H-2 & Y	Centinela Ave & Mesmer Ave	AM	0.489	A	0.562	A	0.769	C	+0.207	0.543	A	See footnote 2
			PM	0.333	A	0.439	A	0.575	A	+0.136	0.545	A	
11		Centinela Ave & Sepulveda Blvd	AM	1.095	F	1.573	F	1.794	F	+0.221	1.600	F	See footnote 3
			PM	1.095	F	1.406	F	1.491	F	+0.085	1.417	F	
***		Centinela Ave & Short Avenue	AM	0.639	B	0.809	D	0.836	D	+0.027	0.809	D	See footnote 11 and 12
			PM	0.823	D	0.972	E	1.035	F	+0.063	0.972	E	
12	H-1,2 Y	Centinela Ave & Teale St	AM	0.379	A	0.426	A	0.755	C	+0.329	0.549	A	See footnote 2
			PM	0.321	A	0.406	A	0.642	B	+0.236	0.436	A	
13		Century Blvd & Sepulveda Blvd	AM	0.529	A	0.742	C	0.767	C	+0.025	0.767	C	See footnote 1 and 10
			PM	0.734	C	0.988	E	1.107	F	+0.119	1.016	F	
14	K	Culver Blvd & Inglewood Blvd	AM	0.837	D	0.953	E	0.987	E	+0.034	0.937	E	
			PM	0.803	D	0.971	E	0.971	E	+0.000	0.879	D	

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Playa Vista Phase I
Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwng Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
15	L	Culver Blvd & Jefferson Blvd	AM	1.041	F	1.199	F	1.281	F	+0.082	0.952	E	
			PM	0.923	E	1.029	F	1.087	F	+0.058	1.009	F	
16	M-1(1) M-2	Culver Blvd & Marina Fwy EB Ramps	AM	1.323	F	1.679	F	1.719	F	+0.040	1.470	F	See footnote 9
			PM	0.943	E	1.265	F	1.281	F	+0.016	1.243	F	
17	M-1(1) M-2	Culver Blvd & Marina Fwy WB Ramps	AM	0.834	D	1.115	F	1.128	F	+0.013	0.632	B	See footnote 9
			PM	1.036	F	1.474	F	1.527	F	+0.053	1.125	F	
18	N	Culver Blvd & Nicholson St	AM	0.951	E	1.057	F	1.109	F	+0.052	1.027	F	See footnote 4
			PM	0.842	D	0.935	E	1.018	F	+0.083	0.915	E	
19	O	Culver Blvd & Vista Del Mar	AM	0.837	D	0.940	E	0.969	E	+0.029	0.940	E	
			PM	0.873	D	0.974	E	1.012	F	+0.038	0.875	D	
20		Fiji Way & Lincoln Blvd	AM	0.627	B	0.753	C	0.817	D	+0.064	0.785	C	See footnote 1
			PM	0.780	C	1.040	F	1.111	F	+0.071	1.080	F	
21	D-5	Howard Hughes Pkwy & Sepulveda Blvd	AM	0.839	D	1.178	F	1.250	F	+0.072	1.200	F	See footnote 5
			PM	0.795	C	0.982	E	1.071	F	+0.089	1.019	F	
22	B-4,5	Hughes Terrace & Lincoln Blvd	AM	0.648	B	0.719	C	0.777	C	+0.058	0.575	A	See footnote 1
			PM	0.805	D	1.016	F	1.101	F	+0.085	0.750	C	
23		Imperial Hwy & Sepulveda Blvd	AM	1.111	F	1.178	F	1.234	F	+0.056	1.227	F	See footnote 1
			PM	1.089	F	1.100	F	1.151	F	+0.051	1.145	F	

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Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwng Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
24	A-7,9	Inglewood/Centinela Jefferson Blvd	AM	0.693	B	0.905	E	1.229	F	+0.324	0.834	D	
			PM	0.693	B	0.900	D	1.163	F	+0.263	0.856	D	
25	A-1 B-7	Jefferson Blvd & Lincoln Blvd	AM	0.971	E	1.274	F	1.454	F	+0.180	1.038	F	
			PM	0.967	E	1.334	F	1.547	F	+0.213	1.049	F	
26	A-4	Jefferson Blvd & McConnell Ave	AM	0.307	A	0.412	A	0.596	A	+0.184	0.485	A	See footnote 2 and 9
			PM	0.320	A	0.468	A	0.677	B	+0.209	0.518	A	
27	A-10	Jefferson Blvd & Mesmer Ave	AM	0.391	A	0.512	A	0.786	C	+0.274	0.446	A	See footnote 2 and 9
			PM	0.453	A	0.585	A	0.843	D	+0.258	0.655	B	
28	A-11	Jefferson Blvd & San Diego Fwy NB Ramps	AM	0.894	D	0.965	E	1.180	F	+0.215	0.871	D	See footnote 9
			PM	0.880	D	1.140	F	1.477	F	+0.337	1.128	F	
29	A-11	Jefferson Blvd & San Diego Fwy SB Ramps	AM	0.570	A	0.629	B	0.962	E	+0.333	0.644	B	See footnote 9
			PM	0.608	B	0.794	C	1.116	F	+0.322	0.654	B	
30	A-6	Jefferson Blvd & Westlawn Ave	AM	0.527	A	0.693	B	0.941	E	+0.248	0.709	C	See footnote 9
			PM	0.580	A	0.757	C	0.966	E	+0.209	0.737	C	
31	B-1(1)	La Tijera Blvd & Lincoln Blvd	AM	0.616	B	0.743	C	0.788	C	+0.045	0.787	C	See footnote 6
			PM	0.481	A	0.599	A	0.639	B	+0.040	0.636	B	
32		La Tijera Blvd & San Diego Fwy NB Ramps	AM	0.837	D	1.020	F	1.037	F	+0.017	1.020	F	
			PM	0.935	E	1.105	F	1.112	F	+0.007	1.105	F	

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Playa Vista Phase I

Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwng Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
33		La Tijera Blvd & San Diego Fwy SB Ramps	AM	0.719	C	1.000	E	1.011	F	+0.011	1.009	F	
			PM	0.863	D	0.982	E	0.987	E	+0.005	0.987	E	
34	R-1	La Tijera Blvd & Sepulveda Blvd	AM	1.042	F	1.244	F	1.316	F	+0.072	1.145	F	
			PM	0.999	E	1.237	F	1.265	F	+0.028	1.116	F	
35	B-1(1)	Lincoln Blvd & Loyola Blvd	AM	0.439	A	0.568	A	0.609	B	+0.041	0.609	B	See footnote 6 and 10
			PM	0.469	A	0.593	A	0.630	B	+0.037	0.628	B	
36	B-2(2)	Lincoln Blvd & Manchester Ave	AM	0.979	E	1.155	F	1.191	F	+0.036	1.098	F	See footnote 6 and 10
			PM	1.121	F	1.286	F	1.352	F	+0.066	1.310	F	
37		Lincoln Blvd & Marina Exprsswy	AM	0.763	C	0.975	E	1.044	F	+0.069	1.037	F	See footnote 1
			PM	0.804	D	1.151	F	1.207	F	+0.056	1.201	F	
38		Lincoln Blvd & Maxella Ave	AM	0.625	B	0.873	D	0.931	E	+0.058	0.922	E	See footnote 1
			PM	0.818	D	1.202	F	1.270	F	+0.068	1.261	F	
39	B-11	Lincoln Blvd & Mindanao Way	AM	0.899	D	1.073	F	1.160	F	+0.087	1.035	F	See footnote 1
			PM	0.993	E	1.308	F	1.412	F	+0.104	1.268	F	
40		Lincoln Blvd & Rose Ave	AM	0.803	D	0.998	E	1.018	F	+0.020	1.017	F	See footnote 1
			PM	0.873	D	1.223	F	1.247	F	+0.024	1.245	F	
41	T	Lincoln Blvd & Sepulveda Blvd	AM	1.050	F	1.025	F	1.075	F	+0.050	0.949	E	See footnote 10
			PM	1.213	F	1.054	F	1.131	F	+0.077	0.969	E	

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Playa Vista Phase I
Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwg Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
42	B-6	Lincoln Blvd & Teale St	AM	0.858	D	1.032	F	1.168	F	+0.136	0.627	B	
			PM	0.788	C	1.081	F	1.170	F	+0.089	0.637	B	
43		Lincoln Blvd & Venice Blvd	AM	0.966	E	1.018	F	1.052	F	+0.034	1.050	F	See footnote 1
			PM	1.075	F	1.311	F	1.358	F	+0.047	1.353	F	
44		Lincoln Blvd & Washington Blvd	AM	0.977	E	1.364	F	1.415	F	+0.051	1.409	F	See footnote 1
			PM	1.105	F	1.534	F	1.582	F	+0.048	1.576	F	
45	B-3	Lincoln Blvd & 83rd St	AM	0.932	E	1.110	F	1.155	F	+0.045	1.000	E	See footnote 6
			PM	0.769	C	0.949	E	0.999	E	+0.050	0.986	E	
***		Main St & Rose Ave	AM	0.658	B	0.790	C	0.790	C	+0.000	0.763	C	See footnote 1
			PM	0.887	D	1.088	F	1.101	F	+0.013	0.958	E	
46	W-3	Manchester Ave & Pershing Dr	AM	0.827	D	0.953	E	0.993	E	+0.040	0.881	D	
			PM	0.760	C	0.911	E	0.975	E	+0.064	0.871	D	
47	D-1	Manchester Ave & Sepulveda Blvd	AM	1.061	F	1.347	F	1.415	F	+0.068	1.277	F	See footnote 1
			PM	1.262	F	1.503	F	1.533	F	+0.030	1.364	F	
48	X-1(1)	Marina Fwy EB Ramps & Mindanao Way	AM	0.853	D	0.994	E	1.033	F	+0.039	0.935	E	
			PM	0.905	E	1.112	F	1.131	F	+0.019	1.073	F	
49	X-1(1)	Marina Fwy WB Ramps & Mindanao Way	AM	0.537	A	0.605	B	0.621	B	+0.016	0.447	A	
			PM	0.792	C	0.936	E	0.987	E	+0.051	0.701	C	

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ATTACHMENT "E" (Revised 5/13/93)
Playa Vista Phase I
Alternate Impact and Mitigation Summary (see footnotes 9 to 12)

Int. No.	Drwg Nos.	Intersection		Existing		1997 Future w/o Project		1997 Future w/ Project		Project Impact	1997 Future w/ Project, TDM & Mitigation		Comments
				V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS	
50	D-4	Sepulveda Blvd & 76th/77th St	AM	1.033	F	1.287	F	1.359	F	+0.072	1.219	F	
			PM	0.827	D	1.216	F	1.280	F	+0.064	1.167	F	
51	D-3	Sepulveda Blvd & 79th/80th St	AM	0.882	D	1.220	F	1.289	F	+0.069	1.147	F	
			PM	0.829	D	1.133	F	1.194	F	+0.061	1.087	F	
52	D-2	Sepulveda Blvd & 83rd St	AM	0.467	A	0.701	C	0.769	C	+0.068	0.701	C	
			PM	0.503	A	0.931	E	0.957	E	+0.026	0.886	D	

Footnotes:

- (1) Project impact mitigated through the "Lincoln Boulevard Transit Enhancement Program" with ATSAC and transit pre-emption. See DEIR and text of DOT letter herein.
- (2) While project impacts are not completely mitigated, the proposed improvements will provide a future LOS of B or better.
- (3) Project impact not mitigated. However, the applicant has proposed mitigation now under review by Culver City.
- (4) Project impacts at this intersection are mitigated per calculations. However, this improvement eliminates the northbound Nicholson Street left-turn movement at Culver Boulevard. Further improvements are proposed for the Master Plan development.
- (5) Project impact is only partially mitigated at this intersection.
- (6) Project impacts at this intersection are considered to be mitigated because the additional through lane in the Lincoln corridor will significantly improve regional traffic flow. See text of DOT letter herein.
- (7) Traffic impact analysis focused on weekday peak hour traffic only. Weekend summer beach traffic traversing Jefferson Blvd, Culver Blvd, Marina Freeway, Venice Blvd and Washington Blvd could be further impacted with the Playa Vista Phase I development and could be mitigated through beach oriented shuttles.
- (8) A description of the physical street and intersection improvements are summarized in Attachment "B".
- (9) Shading indicates changes to the V/C ratios due to the rerouting of traffic stemming from the alternate mitigation measures.
- (10) Shading indicates reduction of V/C ratios by minus 0.07 at pre-project levels for the existing LAX ATSAC intersections.
- (11) Shading indicates this intersection was identified as a newly impacted study intersection.
- (12) Project impact at this intersection is mitigated by contributing \$120,000 to a project in the City's Five Year Capital Improvement Program proposed at this location.
- (13) Shading indicates a correction.

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CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Lincoln Bl. & Jefferson Bl.
DOT Case No. CTC 91-025

Date: September 16, 1992

To: Merryl Edelstein, Senior City Planner
Attn: Dick Takase, City Planner
Department of City Planning

Haripal S. Vir

From: Haripal S. Vir, Senior Transportation Engineer
Department of Transportation

Subject: INITIAL TRAFFIC ASSESSMENT AND MITIGATION MEASURES FOR
THE PROPOSED PLAYA VISTA PROJECT AT THE INTERSECTION OF
LINCOLN BOULEVARD AND JEFFERSON BOULEVARD
EIR NO. 90-0200 (C) (CUB) (CUZ) (GPA) (SUB) (VAC) (ZC)

The Department of Transportation (DOT) has completed the initial traffic assessment for both the Phase I and Master Plan of the proposed Playa Vista mixed-use development. The proposed project is located within the boundaries of the Coastal Transportation Corridor Specific Plan (Ordinance No. 160,394 or current revision). As illustrated in Attachment "A", the proposed Master Plan Playa Vista development is divided into four sections (Areas A, B, C and D) located adjacent to the intersections of Lincoln Boulevard/Jefferson Boulevard, Lincoln Boulevard/Culver Boulevard and Centinela Avenue/Jefferson Boulevard. Attachment "B" illustrates Phase I of the Playa Vista development which is a portion of Master Plan Area D.

The proposed Master Plan Playa Vista project includes 5,025,000 net square feet of office space, 13,085 multi-family dwelling units, 595,000 net square feet of retail, 1,050 hotel rooms and approximately 579,000 gross square feet of community serving uses. The Phase I portion includes 1,250,000 net square feet of office space, 3,246 multi-family dwelling units, 35,000 net square feet of retail, 300 hotel rooms and approximately 120,000 square feet of community serving uses. Pursuant to the Coastal Transportation Corridor Specific Plan, the Master Plan project would generate 224,170 daily trips, 21,207 a.m. peak hour trips and 26,298 p.m. peak hour trips (see Attachment "A-I"), and the Phase I project would generate 49,620 daily trips, 5,117 a.m. peak hour trips and 6,021 p.m. peak hour trips (see Attachment "B-I").

DISCUSSION AND FINDINGS

The revised traffic study (August 25, 1992) prepared by Barton Aschman Associates and as further revised by DOT adequately addresses traffic impacts of both the Phase I and the Master Plan projects. A summary of project-related traffic impacts for the Master Plan project and the Phase I project is illustrated in

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Attachments "A-II" and "E" respectively. It also adequately describes the specific mitigation measures of the Phase I project and, in general terms, describes potential measures necessary to mitigate or reduce the Master Plan impacts. It is important to note that this letter specifies in detail only the feasible mitigation measures for Phase I of the proposed Playa Vista project.

DOT has determined that after taking into account the trip reduction benefits of the mixed-use nature of the project, the proposed Master Plan Playa Vista project would have significant transportation impacts at 57 intersections fully or partially within the City of Los Angeles as stated in the DOT letter dated July 24, 1992 (see Attachment "C"). Due to the magnitude of the total trips generated by the proposed Master Plan Playa Vista project, the traffic study indicates that the existing roadway infrastructure cannot accommodate the Master Plan trips without major highway and street improvements and transit and Transportation Demand Management (TDM) programs. A subsequent traffic analysis will be required to determine in specific detail the feasible transportation improvements necessary to mitigate the traffic impacts generated by the proposed Master Plan or any portion of the Master Plan to be constructed beyond Phase I.

As referenced in the DOT letter dated June 17, 1992 (see Attachment "D"), DOT has determined that without mitigation, Phase I of the proposed project would have significant transportation impacts at 52 intersections fully or partially within the City of Los Angeles (see Attachment "E"). Attachment "F" shows the significant transportation impact criteria used to determine the project-related transportation impacts for the proposed project.

After a careful review of the proposed feasible mitigation measures, DOT has determined that the Phase I project can fully or partially mitigate its project-related traffic impacts in the City of Los Angeles as described below:

<u>Intersections</u>	<u>Mitigation</u>
38	Mitigated through street widenings, traffic signal improvements, ATSAC and the TDM Program
9	Mitigated through the Transit Enhancement Program together with ATSAC and the TDM Program
5	Partially mitigated to the extent feasible through minor street improvements and the TDM Program
—	
52 total intersections	

Thirty-eight (38) of the fifty-two (52) significantly impacted intersections can be adequately mitigated to a level of

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insignificance by constructing Transportation System Management (TSM) improvements (i.e. street and intersection widenings and traffic signal modifications), implementation of the City's Automated Traffic Surveillance and Control (ATSAC) System, and the adoption of the Transportation Demand Management (TDM) programs to reduce peak hour vehicular trips. It is noted that several of these physical street and intersection improvements would require narrowing of sidewalks and the removal of on-street parking on streets within the study area. Further discussion on the parking impacts is presented separately on page 8 of this letter.

At nine intersections in the Lincoln/Sepulveda Boulevard Corridor, where no adequate physical street or traffic signal improvements are currently feasible, DOT, together with the applicant and affected transit agencies, has proposed that the applicant implement a special trip reduction program through transit enhancement consisting of additional buses, preferential operation of traffic signals for buses and installing the computerized traffic control system, ATSAC. With the implementation of this transit enhancement program as further described in Attachment "J", the Phase I project can mitigate the transportation impacts at nine intersections within the Lincoln/Sepulveda Boulevard Corridor to a level of insignificance. This innovative alternative transit enhancement/mitigation plan is aimed at increasing the efficiency of traffic signal operation and reducing other non-project peak hour vehicle trips by improving public transit along Lincoln Boulevard and Sepulveda Boulevard between the Cities of Santa Monica and El Segundo.

Three of the remaining five impacted intersections, as stated below, can be only partially mitigated and will yield a projected level of service (LOS) of C or better with the proposed mitigations. Generally, DOT considers any intersection functioning at LOS C or better to be at a good operating condition.

- Centinela Avenue and Mesmer Avenue
- Jefferson Boulevard and Mesmer Avenue
- Jefferson Boulevard and San Diego Freeway southbound ramps

The remaining two impacted intersections as stated below can only be partially mitigated with the proposed feasible mitigation measures and will yield a projected LOS of E or F:

- Centinela Avenue and Sepulveda Boulevard
- Howard Hughes Parkway and Sepulveda Boulevard

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PHASE I MITIGATION PLAN

The Phase I Mitigation Plan has the following five components:

1. Transit System Management (TSM) Improvements
2. Transportation Demand Management (TDM) Program
3. Lincoln Boulevard Transit Enhancement Program
4. Phasing of Mitigation Measures
5. Parking Impacts

DOT has determined that the proposed Phase I of the Playa Vista project can adequately mitigate 38 of its impacted intersections to a level of insignificance by implementing the following TSM improvements.

1. Transportation System Management (TSM) Improvements

A. Physical Street and Intersection Improvements

The proposed traffic mitigation measures for the proposed Phase I of the Playa Vista project, described in Attachment "G", consist of widening and restriping of streets and intersections; traffic signal improvements; contribution to or construction of ATSAC, improvements; freeway ramp improvements; and property dedication along the project frontage to widen adjacent streets for additional vehicular capacity. It is important to note that the feasibility of the street widenings and the narrowing of the sidewalks must be determined further by the Bureau of Engineering, Department of Public Works. In addition, all mitigation measures, project development, and associated permitting shall be coordinated in accordance with a phasing plan described herein and in Attachment "K".

The proposed street and signal improvements on City streets in each phase must be guaranteed through the B-Permit process of the Bureau of Engineering, Department of Public Works, before the issuance of any building permit in accordance with the phasing plan and completed before the issuance of any temporary or permanent certificate of occupancy, to the satisfaction of DOT and Bureau of Engineering.

All improvements along state highways and along freeway on-ramps and off-ramps require approval from the State of California Department of Transportation (Caltrans). In addition, an encroachment permit must be obtained from Caltrans for each of these improvements before the issuance of any building permit, to the satisfaction of Caltrans, DOT and Bureau of Engineering in accordance with the phasing plan. In the event the applicant is

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unable to obtain encroachment permits or other approvals from Caltrans for State highway improvements in a timely fashion, a temporary certificate of occupancy may be granted provided the applicant has demonstrated all reasonable efforts and due diligence to complete the necessary permitting and improvements in a timely fashion to the satisfaction of DOT.

B. Street Dedications

1. Existing Streets

The applicant shall make the applicable highway dedication and improvements along Lincoln Boulevard, Jefferson Boulevard, Centinela Avenue, Bay Street, and Teale Street as determined by DOT and the Bureau of Engineering, Department of Public Works. Lincoln Boulevard is designated as a Super Major Highway; Jefferson Boulevard is designated as a Major Highway; and Centinela Avenue, Bay Street and Teale Street are each designated as a Secondary Highway. The minimum project dedication requirements for Jefferson Boulevard, Centinela Avenue and Lincoln Boulevard are discussed in Attachment "G".

2. New Streets

The applicant has submitted Tentative Tract No. 49104 (see Attachment "H") to the City for approval. As seen on the tract map, the applicant proposes several new dedicated streets. DOT has made numerous comments on this tract map to be recommended later as conditions upon the tract map approval. As part of these new dedicated streets, three arterials will exist within the Phase I portion of the proposed project - Centinela Avenue, Teale Street and Bay Street. The minimum project dedication requirements for these streets are discussed in Attachment "G" (Intersection numbers 1, 5, 12 and 42).

C. Driveway and Internal Circulation

These findings do not include approval of driveway and parking scheme for the proposed project. That review should be accomplished by submitting site plans separately to DOT.

2. Phase I Transportation Demand Management (TDM) Program

Phase I of the proposed Playa Vista project is required to reduce its peak hour vehicular trips through the

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implementation of an aggressive TDM Program. The TDM Program shall comply with the applicable provisions of the Coastal Transportation Corridor Specific Plan at the time of issuance of any building permit and meet the goals stated below. The TDM Program shall be prepared and implemented pursuant to the DOT requirements outlined in Attachment "I". Prior to the recordation of any tract map for any subdivision for Phase I, the applicant must record a covenant and agreement, to the satisfaction of DOT, to guarantee the following:

1. TDM Goals

- a. Average Vehicle Ridership (AVR) of 1.5 within five years of the issuance of any temporary or permanent certificate of occupancy of any commercial office building; and
- b. A 20 percent reduction of net trips generated by the commercial office building in a.m. and p.m. peak hour after adjustments for discounted trips due to mixed-use land development.

2. Monitoring Procedures

The TDM Program shall include procedures for monitoring and reporting vehicular traffic counts and the AVR for the Phase I portion of the project subject to the TDM requirements. Monitoring shall be accomplished on a regular basis through tenant and employee surveys and traffic counts.

3. Enforcement and Penalty

The implementation of the TDM Program shall be coordinated, guaranteed and enforced through a Transportation Management Association (TMA) and shall include necessary funding mechanisms to carry out the program and penalties for non-achievement of goals. The City may require annual deposits of money in a TDM fund to guarantee performance of the program.

4. Scope of the TDM Program

The TDM Program shall include at a minimum the following policies and actions:

- establish and operate a TMA with at least one part-time position after the occupancy of the first commercial office building and one full-time position after the occupancy of the first 500,000 square feet of commercial office

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- link the east and west ends of Area "D" by an internal transit system
- encourage rideshare through carpools and vanpools
- promote and implement policies to encourage employees and workers to live within the Playa Vista development
- implement parking policies to discourage the use of single occupant vehicular trips to and from Playa Vista
- provide a cash equivalent option to employees in-lieu of subsidized parking (parking cash-out)
- reduce the on-site commercial office parking to a maximum of two spaces per 1,000 square feet.

5. Master Plan TDM Program

The TDM Program for Phase I shall have the flexibility for amendment as appropriate to include further TDM measures as may be necessary for the Master Plan.

3. Lincoln Boulevard Transit Enhancement Program

The proposed Phase I of the Playa Vista project can mitigate the project-related traffic impacts at the following nine intersections by implementing a transit program in addition to the previously mentioned TDM and TSM improvements. After a careful analysis of trip distribution and level of service calculations, DOT has determined that a minimum of 302 peak hour vehicular trips must be removed from the Lincoln/Sepulveda corridor, based on the most critical impacted intersection, to reduce the project-related traffic impacts to a level of insignificance. The proposed Lincoln Boulevard Transit Enhancement Program (see Attachment "J"), consisting of a combination of transit enhancements and ATSAC improvements, could achieve removal or mitigation of these trips through increased bus ridership and street capacity.

- Bali Way and Lincoln Boulevard
- Century Boulevard and Sepulveda Boulevard
- Fiji Way and Lincoln Boulevard
- Imperial Highway and Sepulveda Boulevard
- Lincoln Boulevard and Marina Expressway
- Lincoln Boulevard and Maxella Avenue
- Lincoln Boulevard and Rose Avenue
- Lincoln Boulevard and Venice Boulevard
- Lincoln Boulevard and Washington Boulevard

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4. Phasing of Phase I Mitigation Measures

The Phase I project is proposed to be built in six subphases (1A through 1F) over a period of approximately five years. Because of the magnitude of the Phase I development and the associated mitigation measures, it is essential that the mitigation measures be closely related and coordinated with the development subphasing plan. The applicant has proposed a phasing plan as shown in Attachment "K". Based on preliminary information, DOT has approved the mitigation sequencing as shown therein. The proposed subphasing and mitigation sequencing and any changes therein shall be subject to further review and approval of DOT in accordance with the requirements of the Coastal Transportation Corridor Specific Plan before the issuance of any building permits.

5. Phase I Parking Impacts

The implementation of the proposed mitigation plans, as described in Attachment "G", will reduce the number of residential and commercial on-street parking spaces by 190 spaces in the study area. Attachment "L" ("Parking Impacts") details the number of on-street parking spaces impacted along the following eight streets:

Parking Impacts Associated with
Phase I Mitigation Plan

<u>Street</u>	<u>Spaces Eliminated During Peak Hours</u>	<u>Spaces Eliminated For The Entire Day</u>	<u>Total Spaces Eliminated</u>
Centinela Avenue	44 spaces	12 spaces	56 spaces
Culver Boulevard	-	27 spaces	27 spaces
Inglewood Avenue	-	12 spaces	12 spaces
Jefferson Boulevard	19 spaces	17 spaces	36 spaces
Lincoln Boulevard	35 spaces	-	35 spaces
Major Street	19 spaces	-	19 spaces
Pershing Drive	-	1 space	1 space
79th Street	-	4 spaces	4 spaces
Total	117 spaces	73 spaces	190 spaces

MASTER PLAN MITIGATION

DOT has determined that the proposed Master Plan Playa Vista project would have significant transportation impacts at 57 intersections fully or partially within the City of Los Angeles. The traffic study indicates that the existing roadway infrastructure cannot accommodate the Master Plan trips without major highway and street improvements and transit and demand management measures. The applicant intends to construct the remaining portion of the proposed Master Plan Playa Vista project after 1997. A more detailed analysis of the mitigation measures for Master Plan traffic impacts remains to be done in conjunction with additional City actions including amendment of the Specific

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Plan for Playa Vista Areas B, C and D, the Westchester/Playa Del Rey and the Palms/Mar Vista/Del Rey District Plans and the subsequent tract maps. No discretionary approval for the Master Plan portion of the proposed project should be issued until a subsequent traffic analysis to determine appropriate mitigation measures for the Master Plan is completed, satisfactory to the City.

Master Plan Transportation System Management (TSM) Improvements

Although specific transportation improvements for the Master Plan cannot be ascertained at this time, a general description of proposed and potential transportation improvements is contained in Attachment "M". These include on-site regional street improvements proposed for Lincoln Boulevard, Culver Boulevard, Teale Street, Bay Street and Centinela Avenue (extended). Also included are potential off-site regional improvements on various freeways, ramps and interchanges in addition to potential street improvements on Centinela Avenue, Lincoln Boulevard, Sepulveda Boulevard and on other streets. Pedestrian overcrossings at major streets may be necessary. The description of future improvements is not intended to be complete. It is noted that potential Master Plan mitigations include a Trip Cap and revisions in the size of the proposed project.

Master Plan Transportation Demand Management (TDM) Program

Physical street and freeway improvements alone will not mitigate the projected traffic impacts of the Master Plan development. Continued aggressive TDM and Transit Enhancement Programs are imperative. The applicant has proposed an internal transit system to be initiated during Phase I and expanded and completed as part of the Master Plan. The internal transit is also intended to connect Playa Vista to the area beaches to reduce weekend traffic congestion and improve beach access. Further regional transit enhancements may also be necessary including connections to other major employment centers. On-site park-and-ride facilities, bicycle storage and shower facilities, and a regional transit center may also be necessary.

An important additional measure of the Master Plan TDM Program will be a phasing program which reserves a percentage of the total Master Plan projected trips for the last phase of the development. If TDM goals are not met prior to commencing construction of the last phase, then no further building permits would be issued until the goals of previous phases are met; or additional mitigation measures are identified and implemented to the satisfaction of DOT.

Prior to the recordation of any tract map for any subdivision for the Master Plan (beyond Phase I), the applicant should amend the Phase I TDM Program and record a new covenant and agreement, to

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the satisfaction of DOT, to guarantee TDM goals and measures necessary to mitigate the traffic impacts of the Master Plan.

Master Plan Trip Cap

The City may require a Trip Cap on the Master Plan project if all feasible TSM, TDM and Transit Enhancement measures are not foreseen to mitigate the traffic impacts. A potential Trip Cap program is described in Attachment "N".

COASTAL TRANSPORTATION CORRIDOR SPECIFIC PLAN

The proposed Playa Vista project is located within the boundaries of the Coastal Transportation Corridor Specific Plan. The applicant must comply with all provisions of the Specific Plan including the payment of Transportation Impact Assessment Fees, applicable highway dedication and improvements, and guarantee of mitigation measures before the issuance of building permits. It should be noted that the Specific Plan is being revised in a broad manner. Some of the key amendments include a proposal to raise the Transportation Impact Assessment (Trip) fee from \$2,345 to \$5,690 per trip.

If you have any questions, please call David Leatherman or Randall Tanijiri of our Department at (213) 485-1062.

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Attachments:

- A Project Boundary Map of Master Plan
- A-I Trip Generation Table - Master Plan
- A-II Level of Service Table - Master Plan
- B Project Boundary Map of Phase I
- B-I Trip Generation Table - Playa Vista
- C DOT Master Plan Initial Assessment Letter (7/24/92)
- D DOT Phase I Initial Assessment Letter (6/17/92)
- E Phase I Impact and Mitigation Summary
- F Definition of Significant Impact Criteria
- G Description of Physical Street Improvements - Phase I
- H Tentative Tract Map No. 49104 - Phase I
- I DOT TDM Requirements
- J Lincoln Boulevard Transit Enhancement Program - Phase I
- K Subphasing Plan - Phase I
- L Parking Impacts - Phase I
- M Master Plan Improvements
- N Trip Cap - Master Plan

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cc: Sixth Council District
Tom Conner/Allyn Rifkin, DOT
DOT Design Division
DOT ATSAC Division
DOT Bikeway Division
DOT Western District Office
WLA Engineering District Office
Caltrans
County of Los Angeles
City of Culver City
Maguire Thomas Partners
Barton-Aschman Associates
Psomas and Associates

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